

Your Comment on the Waihi North application

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

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)			
First name	Gloria		
Last name	Sharp		
Postal address	[REDACTED]		
Home phone / Mobile phone	[REDACTED]	Work phone	[REDACTED]
Email (a valid email address enables us to communicate efficiently with you)	[REDACTED]		
2. We will email you draft conditions of consent for your comment			
<input checked="" type="checkbox"/>	I can receive emails and my email address is correct	<input type="checkbox"/>	I cannot receive emails and my postal address is correct

Thank you for your comments

Gloria Jane Sharp JP (Ret) &
David Noel Sharp

Waihi

Hauraki Nth Island

Waikato/Coromandel 3610

The NZ Government Fast Track Team
Chair & Members of the Team
Towards the FT Application by Oceana Gold Mining Co
North Project new mining license proposition in Waihi

Re: Our Submission towards the OGM North Project Mining License

Kia Ora **Tēnā koutou katoa** –Greetings to you all. My name is Gloria Sharp, I was born into the Stewart Clan, my ancestors and myself come from Scotland. I am 73 years, have lived in NZ for 66 years and I have lived and worked in the Waihi area for 52 years, 11 of which at the aforementioned property. I have been married to David for 51 years.

TABLE OF CONTENTS

<i>Item No 1. Page 2 to 4</i>	<i>Democratic Failings of the Fast Track Act</i>
<i>Item No 2. Page 4 to 5</i>	<i>My 52 year Association with the Area / Background</i>
<i>Item No 3. Page 5</i>	<i>Basis of Submission</i>
<i>Item No 4. Page 5 to 6</i>	<i>Options You Have</i>
<i>Item No 5. Page 6</i>	<i>Documentation & Consultation</i>
<i>Item No 6. Page 6 to 9</i>	<i>Monitoring</i>
<i>Item No 7. Page 9 to 18</i>	<i>The Environment</i>
<i>Item No. 8. Page 18 to 19</i>	<i>Social Impact</i>
<i>Item No. 9. Page 19 to 20</i>	<i>Employment</i>
<i>Item No.10. Page 20 to 22</i>	<i>Economic</i>
<i>Item No.11. Page 22 to 23</i>	<i>Property Values</i>
<i>Item No.12 Page 24 to 20</i>	<i>Mining Co Lost it's Social License</i>
<i>Item No.13 Page 25</i>	<i>Risks Posed By Mining Activities</i>
<i>Item No.14. Page 25</i>	<i>Council complicit with Mining Co.</i>
<i>Item No.15 Page 25 to 26</i>	<i>Mining Royalties</i>
<i>Item No.16 Page 26</i>	<i>Martha Trust for the pit</i>
<i>Item No.17 Page 26</i>	<i>Planning for Mine Closure</i>
<i>Item No.18 Page 26</i>	<i>The Reinstatement Plans</i>
<i>Item No.19 Page 27</i>	<i>Newspaper initiative for Waihi Plus creation of a new Waihi Community Consultative Group.</i>
<i>Item No.20 Page 27 to 28</i>	<i>Sheet of Questions for FT Team</i>
<i>Item No.21 Page 28 to 30</i>	<i>Summation – Conditions Imperative to be Included</i>

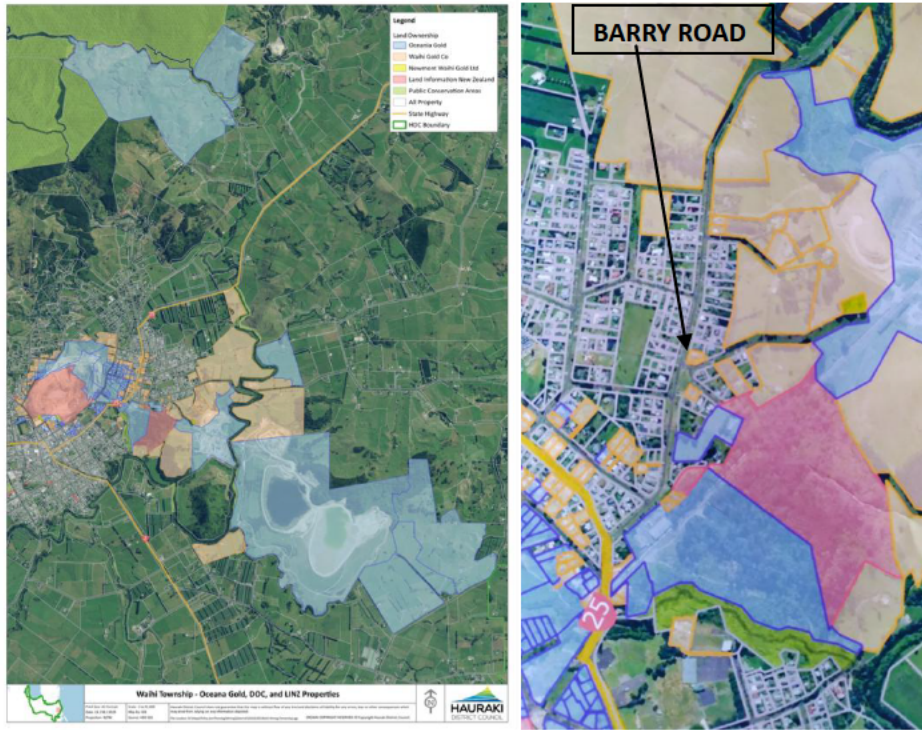
Item No. 21 Page 28 to 30 Summation Pt 2 – Reasons for Declining the Application
Item No. 22 Page 31 to 32 The writings of Christine Mallett – Living in a Mining Town.
Pages 32 to 35 Related Articles.

Item 1. Democratic Failings of the Fast Track Act

It certainly is a cherished part of our democratic system to be awarded the opportunity to put our perspective to the body who is charged with ruling on this application, which, with all matters considered, will ultimately have far-reaching impacts and ramifications again on the people and town of Waihi. Even at this late timing being offered 20 days to formulate a submission with little impartial information available, I am left still waiting for some information from Council. Several questions of which I was advised to put to you the 'Team' about. Some are itemised further on and would look to you for the answers. Page 26-27. In fact I sent questions to Council about 2 years ago the response was it was now a FT application and Council had not assessed it.

It goes without saying that the Fast Track Act has been viewed by the majority of New Zealander's as a retrograde step against our democratic system, removing the rights of people to lodge submissions and be heard on such applications. How else do those with power really form an unabridged view from the citizens who are/will be affected? Even then many do not wish to 'raise their heads above the parapet' for fear of being 'shot down' by those with little future long-term association with the town or those conflicted. Lest we overlook those who do not hold the knowledge / implications of mining.

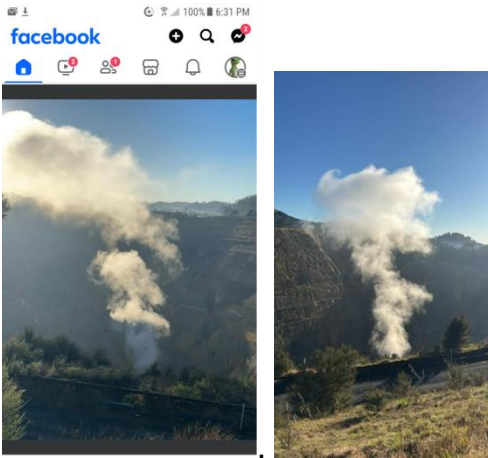
Offering at this late date the opportunity only to a 'chosen' few, described as 'interested parties' Identified By whom? It would seem only our side of Barry road, if that, has been offered this opportunity, when it not only will affect the property's across the road, but all of Waihi. Refer to the map below - there are 61 properties across the road from us on the left-hand-side, looks like 36 on our side 10 owned by the Mining Co. Then you can see the expanse of mining owned land which is in our area...



I fail to see any advantage to the use of this so called 'fast tracking', other than to limit the time needed for consideration and consultation. It appears to be a extremely expensive duplication of what already exists with the Councils'.

Are you each as qualified as our Council's Planners etc. who hold over 30 years of local mining etc. knowledge? Please illuminate and report on the Fast Track advantages/savings on this to us and for all New Zealanders. Cutting corners never produces a good outcome! The application was initially made in 2022. It moved swiftly through Council who asked the mining company for further information. It was at this stage the company which chose to delay the process, did it have something to do with the FT process being brought in and identifying some advantage to it?

Whereby an overseas multi-national company can simply walk into town and dictate to it's residents that it has been given the rights by the NZ Government to; Excavate the local historic mountain of the town, creating a dangerous enormous pit ready to consume the town at any time, which was known as a Māori burial ground, tapu; bore beneath their houses; cause blasting and vibration to properties; create dust; destroying three high producing farms etc. to later change the authorised conditions without public notice (e.g. ceased monitoring for PC2.5 and PM10 the most harmful particles to our lungs, some years ago giving the reason 'not picking any up in tests', then installs air input vents, one in the Martha pit, and changes them to extrusion vents, taking all of the hazardous air from tunneling out into the heart of town - showing up as a cloud in that and the other site on the side of Union Hill, unmonitored. (Recent Photo of the pit below where a resident was asking what it was)



To nominate a group by the name of The Waihi Community Forum as an interested party when it does not, as its name applies, represent the citizens of this community. The Constitution was conveniently changed over the years and developed into a 'closed shop'. It's membership is conflicted. It's meetings are not open to the public; nor are they nominated to the positions; it has membership of two mining company reps; two council reps (both groups support mining) and the remaining 5 members from community. I am aware that at least 3 have business dealings with the company and are shoulder tapped for the forum. The WC Forum does not hold public meetings

The WC Forum was asked to make submission to you. They had no idea how to go about this. Caught in a 'catch-22' was my estimation. One member was put onto me, asking of my concerns. She was a Forum Member, Councilor and notified person also. You could say 'I read the riot act'. Mainly emphasising that it was important for there to be a public meeting, to explain the project and answer questions. What was the Council there for - in the main to put forward the communities views. After all where in fact is this to be found?

She came back to me saying they had decided to hold a public meeting on the Friday 8/8/25 at the hall, 3 days time. I said - insufficient time make it Sat 16th/8. She would put it to 'them'. Came back saying the meeting will be Friday 15th/8 but only for those who have been asked to comment. That an 'independent friend of the commenter' (mining Co) has been engaged to assist with 'making their submissions.'

That is the total of consultation. The mining company provides grand statements of what it offers in this regards. How many take up the offer? I look back to one occasion I took up the offer of making an appointment to speak with staff at their town centre office when this project was first mooted. I was made to feel extremely awkward and unwelcome to asking my questions.

So please bare this in mind when reading the WC Forum's submission.

(I ask you to consider suggestions contained within my submission to address the failures in this area and how to address this for good community consultation and communication process' going forward – **Refer Item 18. Newspaper Initiative for Waihi and the formation of a Community Consultative Group**)

Item 2. TO COMMENCE, A LITTLE OF MY LOCAL 52 YEAR ASSOCIATION WITH THIS AREA & BACKGROUND:-

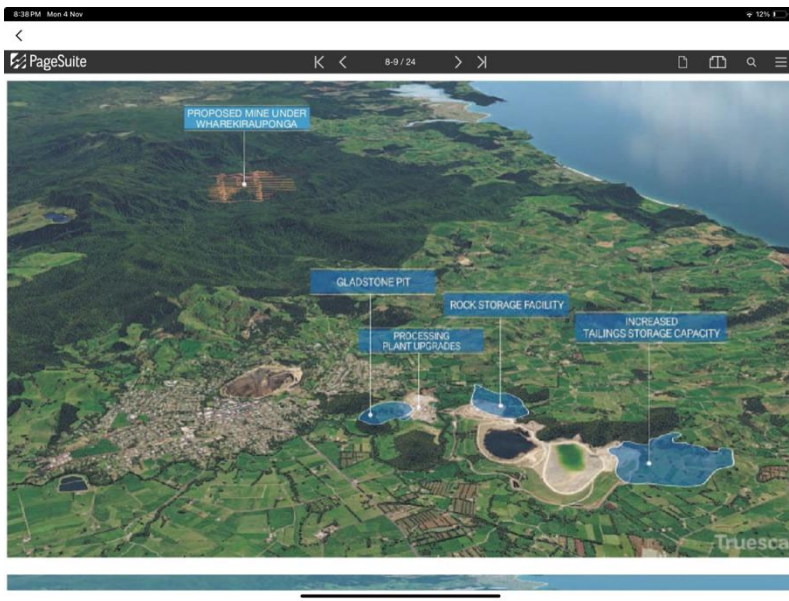
The WAIHI Borough Council is where, in 1976, I commenced my work in the local government sphere as a rating/accounts etc. Senior Clerk, then relieved in the Dep Town Clerk role on several occasions. With Amalgamation in 1985, the Hauraki District Council, I secured the position of WAIHI Area Office Manager and several years later adding to this Community Facilities Manager.

Obtained Massey University paper on Local Government Administration around 1988)

Leaving in 1996 (20 years later) to become Bursar/Principal's Secretary at the WAIHI College, which was later renamed the Executive Officer for a term of 9 years.

Served as a Justice of the Peace in the area for 26 years.

Shifted from Bowentown, where we resided since 1976, into WAIHI 11 years ago. (knowing that the underground mining in our vicinity would cease within 2 years). I served on the WAIHI Beach Ratepayer's Assoc for a number of years.



A view with a perspective revealing the —
decimation of the farm land and Conservation forest.

Item 3. OUR SUBMISSION

It is from a 'commonsense', a fundamental knowledge to understanding the implications of this application, together with an overall affinity and awareness of the town and its people that I put forward my proposals / comments on this Application to you.

Rather than simply address each technical issue prepared by the Mining Company (which I am not qualified to do nor pay for a solicitor to advise on our behalf) we must rely on Council's and your Team to address our/the areas of concern on our behalf. Both of which we are aware to be in favour, from the outset, of supporting the application.

Item 4. OPTIONS YOU HAVE

A. “Should the current application, to create yet another open pit, create underground tunnels and extractions with its’ impacts on; farm land; water supplies; native species; flora and fauna; air quality; effects from blasting; overall the degradation to the people of Waihi’s quality of life, for the said land for mining, be approved, thereby in so doing signal to the mining companies that it remains ‘open slather’ now, to simply keep bringing on those applications to extract one vein at a time over the many veins of ore shown on their plans, as the price of gold increases – Revealing that a Fast Track Application will Award it the seal of approval, to continue their stealthily churning up the land for such activity with little reward for NZ let alone zilch for Waihi Community. OR

B. “Should this mining company be prevented from further mining, with its’ resulting impacts; Tailing Storage Facilities; environmental and people impacts; the on-going monitoring / maintenance / restoration etc. costs (this government has removed the cover for a community to sue this companies successor for ongoing costs PLUS the right to appeal for a Judicial Review!); some of this town’s most valuable irreplaceable land - Three dairy farms, the loss of its production etc. to then contain hazardous waste (documents attached regarding Storeage Tailings Facilities) which as a result is unusable ‘ever’ again for anything - animals and trees are out. In so doing, preventing all of the consequential impacts and future uncertainties over many years (for ever) to be handed on to our children from a resulting mining licence? which this and other mining license approvals will, without doubt, become a fete compli?’”.

Item 5. DOCUMENTATION FOR THE APPLICATION & CONSULTATION

Yes, I did try to wade my way through the screeds of information within reports, technical reports and Assessment documents in a limited time (20 days) and must admit a person would certainly require a couple of Degrees to completely analyze these. I had delved into trying to understand the project a few years back, alas didn’t get a lot answered by Council then or recently (re correspondence attached) at least I held some understanding.

Does the Fast Track Team have confidence in using any of the information provided by the Consultants which have been engaged by the applicant to prepare these reports? As happens now, where Councils’ rely on the company for the monitoring of the mining conditions? As did the Government and it’s agencies with the Pike River Mine?

As at my time of writing this, Council is still preparing its submission, so it is impossible for the people affected, to gain knowledge from a supposedly ‘unbiased’ submission for the people. I use the term lightly as the Council is infavour of the mining and in conflict.

These comments lead me on to the next salient topic which I deem of prime importance with any mining license:-

Item 6. MONITORING

The Labour Government created the new Worksafe Agency as a consequence of the Pike River Mine imploding and the loss of 29 men. One has presumed it would improve the monitoring of mines in this country.

Extract from the Minerals Regulations NZ - 'WorkSafe is responsible for the rules that ensure workers are kept safe – which includes that the risk of a mine failure is as low as reasonably practicable. WorkSafe must approve an operator's Principal Hazard Management Plan – which outlines any hazards and the systems to manage them. (Have you viewed this)

There are also a range of requirements to ensure a mine is managed through its life cycle, including oversight of the design and construction of a mine.

High hazards unit inspectors make onsite inspections over the life-cycle of a mining operation. (These are the Mining Inspectors)

News 1/3/24 ***"WorkSafe is pulling out of funding safety programmes to the tune of up to \$15 million a year, scuttling a "really valuable" one in the high-risk forestry industry."***

In an effort to examine the new Worksafe monitoring regulations (which I assumed would form part of the new regulations which came out of the aftermath to the Pike River mining disaster) I visited the Worksafe site - a 'mining' search brought up 1590 results. I gave up at page 90 of listed documents. A 'monitoring' search revealed nil.

A phone call to its only number 0800 had me shocked by the operator saying he didn't have any information about monitoring of WAIHI mining, that there was no manager I could speak with, that I should lodge an Official Information Application. I further endeavoured to contact the CEO, Steve Haszard, typical of today's leaders in industry etc. there is no direct contact available! Where is the accountability to the public where the monitoring documentation can be viewed?

I raise this matter specifically to alert you to the problems associated with placing your trust in an Applicant who is given the monitoring roll of their own worksites and ask that you satisfy yourself whether the bodies responsible in law for the risk management are in fact carrying out the work required to regularly and physically checkup on the conditions of said licences. Who audits all of the monitoring? Are audits conducted on a 'no-notification' basis? Later in my submission I talk to you of the need for the employment of a full-time council staff member to monitor all of the mining conditions.

Further' it is a company which is showing signs that it is prepared to be loose with monitoring as reported below -

"A gold mine in Otago, set for a fast-tracked expansion, has a history of failing to comply with its resource consent conditions. An Otago Regional Council audit revealed "continued or repeated non-compliances" related to environmental monitoring. Further, a separate audit by Dunedin and Waitaki District Councils uncovered "widespread and ongoing non-compliance" with other consent conditions,

including damage to protected land and inadequate habitat protection. Here's a more detailed breakdown:

Macraes Mine's Compliance Issues:

The OceanaGold's Macraes mine, which has been operating since 1990, has been the subject of two separate audits highlighting significant compliance problems.

First Audit:

The Otago Regional Council audit focused on environmental monitoring conditions, finding numerous instances of non-compliance between 2019 and 2024. It also noted a trend of declining aquatic health in the surrounding ecosystem.

Second Audit:

A second audit, commissioned by the Dunedin City Council and Waitaki District Council, expanded the scope to include land-use consents. This audit revealed breaches related to a QEII covenant, including damage to protected land, inadequate weed and pest control, insufficient planting, and insufficient protection of lizard habitats.

Fast-track Implications:

The mine's expansion, which is part of a fast-tracked project, could extend the mine's life by a decade. The compliance issues raise concerns about the potential environmental impact of the expansion and the effectiveness of the FT approval process.

1. <https://www.rnz.co.nz/news/in-depth/533692/fast-tracked-gold-mine-has-shaky-compliance-history-audit-reveals#:~:text=14%20Nov%202024-,Fast%2Dtracked%20gold%20mine%20has%20shaky%20compliance%20history%2C%20audit%20reveals,company's%20past%20performance%20was%20disappointing.>
2. <https://www.rnz.co.nz/authors/farah-hancock#:~:text=Fast%2Dtracked%20gold%20mine%20has%20shaky%20compliance%20history%2C%20audit%20shows&text=Otago%20Regional%20Council%20found%20OceanaGold's,short%20of%20taking%20enforcement%20action.>

Will your committee members be involved in handling anything you will consent to once you pass any consent? Or do you give the rubber-stamp, take the cash and pass it onto Council's?

You could dictate, at the least, that all monitoring of the mining license conditions receive annual impartial snap audits. That all reports are easily accessible on a particular Webb site. Etc. And that there be a permanent independent monitoring auditor resident in Waihi.

A Caution

A conviction I have held for a many years is that NZ's standards of Management process' and practice have required improved training. It relates particularly to Risk Management and simply that

those 'in command' need to 'personally' take a greater role in 'monitoring' all work, accountability and responsibilities of the entity, prepare a plan and report this to you on a regular schedule.

This work interprets into spot checks of all work and legal responsibilities on a regular un-notifiable basis. An example of my vision above is that of Greg Foran who I viewed actually carrying out the work of any staff member in a doco, often to be found on the ground floor at Walmart. The rewards for any business are enormous as the shareholders agreed. He came into Air NZ from being CEO of Walmart USA it was his interpretation of Manager also.

In summation of this point, it seems that many major disasters have in the main come down to the 'she'll be right attitude'. Those in charge have remained in their 'ivory' office with easy access to delegating work. Instructions on an industries Health & Safety requirements are issued by Worksafe.

True risk management may likely be provided in the documentation issued by Workplace NZ but where is the document covering **their responsibilities on monitoring** the regulations they are deemed to enforce? All I could find was what I provided above "High hazards unit inspectors make onsite inspections over the life-cycle of a mining operation.' Are any reports available to the public? I wanted to know how often their staff undertook spot checks on the applicants monitoring? And view resulting reports. It will take an OIA application to receive their answer I was told by staff. The monitoring reports issued by the Mining Co. to Council's are simply their own reports.

How much resource is put into ensuring that all of the Risk Management Standards are prepared, operable and monitored by those who are appointed to be their legal guardians? I classify you here. This includes Waikato Regional Council. I tried once to view their monitoring reports but failed.

Monitoring - Personal Experience

Moreover, we experienced the tail end of the **underground blasting on Barry Road**, roughly two years of it. We were aware blasting was to cease reasonably soon where we purchased. It was an experience I would not like anyone else to have and our experience was towards the end of the underground mining here.

Emailing the company to report the shaking like major earthquakes, which we deemed must be over the allowable limit when wall hangings also moved, another neighbour reported that their kitchen cupboards were all misaligned due to it (mine company owned); the blast was not appearing on their web site; saying the results go to Australia for interpretation; the road opposite would show a non-complying blast but not the machine next door; that they would look into it. It got to a stage where we requested that a monitor be placed on our property, which took place for a few weeks then was removed. We were told there had been no blasting over the 'thresh-hold' of it's conditions.

I put to you - "why should we be forced to experience any deterioration to our standard of life?"

Reporting to Council on occasion was useless after the 'horse had bolted.' We received roughly \$1500 over 3-4 years, from their compensation scheme. Included an initial \$500 as a new 'member'.

We felt used and abused and guilty of taking 'the pound of silver'. We would have much preferred our peace of mind.

Why was the operation not closed down when any 'recognised' breaches happened, rather than trusting that the mighty dollar would sooth complainants? Oops Council consented to 'over-allowable-limits categories. Taking it for granted the residents accepted this arrangement. Dust was another annoyance it would change the colour of the water fountain...

We do not savour the North mining licence proceeding in the least, another open pit on our back-door. Once again it is up to us to tell you how we feel about it, will it bare any weight on your decision? Who, particularly at the ages of 86 and 72 (with failing health) want, or could handle all of this now?

Item 7. THE ENVIRONMENT

Another major consideration which we trust you will now be well versed in. Again I ask the question of you, should the Mining Company's be permitted to erode the Waihi Community's well-being with its mining activities, by **stealth?** - undermining the property values etc. Just a brief reminder that the mining operations can pollute local waterways with sediment and has/will create waste rock stacks (tailings dams) prone to acid mine drainage.

These require 'for-ever' monitoring. 'Processing ore to extract gold can lead to the arsenic, mercury and cyanide pollution.'

Waikato Regional Council told me that 'all' rivers in WAIHI were polluted and unsuitable for swimming. I sought clarification after going for a swim in the Ohinemuri River opposite Black Hill and observed the water and stream bed was a murky brown metal colour. This is the area where the overflow and treated water from the mines tailing dams is discharged. This project plans to discharge much more into the river. (have you viewed this site?) Are you sure the town's water supply and rivers will not be affected? After reading the company's explanation of the water ramifications it seems extremely risky to me. More reason for a permanent independent overseer to monitor the mining conditions.

The Three farms procured by the Mining Co.

These farms can never be used for production purposes again. I spoke with the Company's **Tailings Storage Facility** Engineer Mr Eric Torvalainen on 23rd October 2024. He confirmed for Mr that:

1. No trees can be planted on these (skyscraper) Dams. They have a sealing layer over the outside of them which limits oxygen and water ingress into the embankments, they needed to make sure that that layer remains integral in the long term therefore only plants with shallow rooting are allowed to be planted.
2. Can sheep and cows be grazed? Productivity in the land is not great as it is flat land. There is no doubt they would not like the sides of the dams eroding which roots and animals do.
3. They would need to be monitored for 20 to 50 years. (I would think eternally myself)

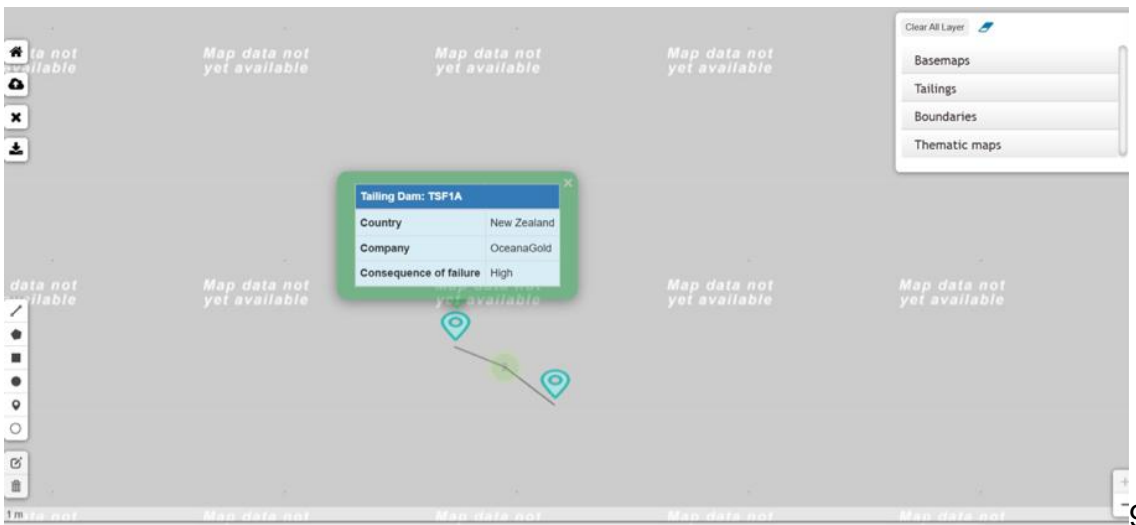
4. The farm purchase on Willows road will hold the rock from the tunnels out to Wharekirauponga.

TSF's – Tailing Storeage Facilities – Pyramids

I commence this subject by referring you to the 'Church of England investors Global Portal information and questions asked of the world's mining companies regarding their tailings dams -

Available by google search "Church of England investors Global Portal info and questions asked re tailings.pdf" And shows Waihi's 'consequence of failure is HIGH.'

There is further matters about these structures I refer to within other sections. In the main I believe it to be far too hazardous to increase the number of these dams.



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Global Tailings Portal

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ABOUT THE GLOBAL TAILINGS PORTAL

The Global Tailings Portal, launched in January 2020, is a free, searchable database with detailed information on more than 1,800 mine tailings dams around the world. It enables users to sort data about tailings dams by location, company, dam type, height, volume, and risk, among other factors. The data was submitted by more than 100 of the world's largest mining companies, in response to requests from institutional investors. Previously, very little information about mine tailings dams was publicly available. The portal is designed to be used by governments, scientists, the finance community, the mining industry, media, and civil society.

The portal was built and is hosted by GRID-Arendal in collaboration with the Investor Mining and Tailings Safety Initiative, which is co-Chaired by the Church of England Pensions Board and the Swedish National Pension Funds' Council on Ethics, with support from the UN Environment Programme.

This current "beta" version of the portal (24th January 2020), is still undergoing testing and development and verification. We welcome feedback, and note that the portal provides links to the underlying public disclosures that companies have made.

More detailed information on the methodology applied to translate data from company disclosures into the portal database is available in our Methodology section, and further details of our quality assurance processes are available below.

In due course we intend to make the database available as a downloadable Excel and CSV file. Currently, this data is available on request from GRID-Arendal (see below).

THE ORIGINS OF THE GLOBAL TAILINGS PORTAL

On 25 January 2019, a mine tailings dam in Brumadinho, Brazil, collapsed, unleashing a torrent of mine waste that killed at least 259 people. It followed a previous tailings dam collapse in Mariana, Brazil, in 2015 that killed 19 people, and a longer history of other dam failures.

The 2019 disaster galvanized a group of major institutional investors to address the issue of mining and tailings safety and demand information from mining companies on where and how they store their waste. Led by the Church of England Pensions Board and the Swedish National Pension Funds' Council on Ethics, the group established the Investor Mining and Tailings Safety Initiative. The initiative is now supported by funds with more than US\$13 trillion in assets under management.

In 2019, the Investor Mining and Tailings Safety Initiative asked 777 publicly listed mining companies for detailed

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is 112,000 tarmac whi... The tarmac... JENNE BO... IT Assisted dy... William and... Late Queen... https://new... Tailings Dat... Tailing Dam

DASHBOARD - TAILING STORAGE FACILITY

Overview Analysis Search Data

Tailing storage facility table

Show entries Search:

Sl.No	Tailing Dam	Mine	Operator	Company	Country	Status	Construction year	Approved design	Rates type	Max. Height	Current storage (m ³)	Planned storage 5 years (m ³)	Independent review	Engineering records	Consequence of failure	Climate
1364	TSP1A	Martha Mine	Wahki Gold	OceanaGold	New Zealand	Active	null	Yes	Downstream	66	12000000	13300000	Yes	OceanaGold	High	NC
1365	TSP2	Martha Mine	Wahki Gold	OceanaGold	New Zealand	Inactive	1987	Yes	Downstream	60	9400000	9400000	Yes	OceanaGold	High	NC
1366	Fossilickers Tailing Storage Facility	Reefion Gold Mine		OceanaGold	New Zealand	Closed	2007	Yes	Downstream	40	9670000	9670000	Yes	OceanaGold	Medium	NC
1367	Souvenir Tailing Storage Facility	Reefion Gold Mine		OceanaGold	New Zealand	Closed	2014	Yes	Open-pit	71	270000	270000	Yes	OceanaGold	Low	NC
1471	Didipio Tailing Storage Facility	Didipio	OceanaGold Singapore pty ltd	OceanaGold	Philippines	Active	2012	Yes	Downstream	60	14348042	27179131	Yes	OceanaGold	High B	AT

Showing 6 to 10 of 11 entries (filtered from 2,144 total entries) Previous 1 2 3 Next

Current storage (m³)	Planned storage (m³)	Independent review	Engineering review	Consequence of failure	Classification system adopted	Past stability concern	Internal external eng. input	Downstream impact assessment	Dam closure status	Monitoring closure	Extreme weather assessment	Disclosure origin	Link	Remarks
1200000	1300000	Yes	OceanaGold	High	NZSOLD	No	Yes	Yes	2005	Yes	Yes	External	Source	Comment
940000	940000	Yes	OceanaGold	High	NZSOLD	No	Yes	Yes	2005	Yes	Yes	External	Source	Comment
967000	967000	Yes	OceanaGold	Medium	NZSOLD	No	Yes	Yes	2019	Yes	Yes	External	Source	Comment
270000	270000	Yes	OceanaGold	Low	NZSOLD	No	Yes	No	2005	Yes	Yes	External	Source	Comment
14346242	27178131	Yes	OceanaGold	High B	ANCOLD	No	Yes	Yes	2005	Yes	Yes	External	Source	Comment

THE Gladstone Pit

"2.10.1.3 Mining of the Gladstone Open Pit

The proposed extent of the crest of the GOP is shown in detail in PSM (2025a), a copy of which is provided in Part B of these application documents. The proposed works will mine out parts of Gladstone Hill and Winner Hill over a period of approximately 6 years, at an average mining rate of 3.5 million tonnes per annum.

At its maximum, the GOP will comprise the following dimensions:

- > Pit area - approximately 18.7 ha;*
- > Pit depth - approximately 95 m;*
- > Pit floor level - approximately 1005 m RL; and 22*
- > Pit length and breadth - approximately 375 m by 625 m."*

3.5 million tonnes p.a. of Gladstone Hill and Winner Hill will be excavated.

The blasting and vehicle noise for this undertaking will be immense can you guarantee the residents will not be affected by this? NO noise, NO dust, NO increase in traffic, No blasting or vibrations etc. Alarmed telemetry monitoring for everything? We are depending on you for this and any other noise or environmental impacts on properties and 'life' surrounding the mining workings.

We do not believe there will be no impact to our quality of life therefore we ask you to decline the application for another Open Pit.

WATER

2.62.7 Water Management - Water Use and Supply

Water will be used for various underground mining operations, including:

- > Tunnel construction, including jumbo drilling and watering down fired headings;
- > Dust suppression on underground roads;
- > Underground stope production drilling;
- > Underground diamond drilling: and
- > Crib rooms.

Recycled water harvested from tunnel water inflows will be used for tunnel construction and underground dust control post construction.

Dewatering

The volume of dewatering required in the tunnels will increase as tunnel development progresses. Assessments to date have predicted 11,800 m³/day will be pumped from the.....

page 580, of the Substantive Application - 'Re-consenting the WTP with similar discharge and receiving water quality standards will not result in detrimental effects on the existing ecological values of the Ohinemuri River.'

Simply stating 'will not result' is an insufficient argument.

We should not be taking any risks regarding tampering with our water supplies! It is hard to believe that The amount of water this company proposes to dewater will have no impact on the various ground waters and rivers.

'8.7.3.5 'While the NES Drinking Water is a relevant consideration with respect to activities proposed, for the reasons set out above, the NES Drinking Water is not an impediment to the granting of approvals for the project.'

I believe it takes priority and on this matter alone this application should be declined!

This Current COGovernment Has created a situation whereby there will be no avenue for the people to seek redress / compensation for any problems arising from these mining sites in the event of these companies going out of business. We need the instigator of approval GOVERNMENT to stand by any funding required in this instance.

CO2e emissions — Has this been assessed for this application?

Where is the CO₂ Evaluation / Report? This is imperative as this industry emits large amounts, of CO₂. This is one of the big ethical downsides of gold mining it is extraordinarily energy intensive. Researchers from the University of Nevada estimate mining and refining a single kilogram of gold generates **12.2 tones of carbon emissions**. It is the cost of gold versus the market price of gold, and the effects on the planet do not enter the equation. (Information came from "The case for leaving NZ's gold in the ground by Tom Pullar-Strecker June 13 2024 Stuff article". So much for **HD Council's Zero Carbon Promise 2021**? What work is it doing to reduce the release of carbon by the industries within the District?

All of Council's Plans stipulate 'Bring on industry, blow the environment, we'll set the standards, we don't live next to it'.

Outgoing Climate Commission Chair, Rod Carr, in his final Environment Select

Committee Appearance on Thursday said “Those who continue to promote the combustion of fossil fuels in the open aire without permanent carbon capture & storeage are, in my view, committing a crime against humanity.”

If mining is to continue elsewhere in NZ, Government needs to urgently commit the industry to the use of the newly developed Electric Mining Trucks.

SubmittorNo. 41 E A Lens to the Plan Change to extend Martha Pit at its recenthearing. He put forward extremely pertinent information to which this Team must heed:-

I fully supported Mr Lens’ points put forward:-

12:04 PM Thu 30 May *** 42% 66
hauraki-dc.govt.nz

4.1 / **CO₂e**

There has been no assessment of CO₂e emissions associated with the Extension of Martha Mineral Zone.

These emissions will be substantial if Oceana Gold expand their mining into this zone. As Council’s own documents state, we need to reduce emissions. Rapidly.

Long Term Plan

Mitigation

Climate change mitigation is being considered at a global level, but we all need to play our part.

Mitigation is finding ways to avoid and reduce emissions of heat-trapping greenhouse gases into the atmosphere to prevent the planet from warming to more extreme temperatures.

Councils have to respond to the effects of climate change (through its impact on infrastructure, businesses and people’s lives) and therefore it is also our responsibility to our communities to reduce its impacts wherever possible.

This will continue to be a focus area moving forward.

To find out more about our climate change mitigation actions go to Zero Carbon Promise - <https://www.hauraki-dc.govt.nz/council/plans-strategies>¹

Zero Carbon Promise

Mayor’s message

You told us during the development of the 2021-31 Long Term Plan that you want to live in a district where we reduce our carbon footprint, we look after our ecosystems and waterways, and we focus on recycling and waste management. You also want us to proactively plan for the effects of climate change...

Unfortunately, around the globe humanity hasn’t looked after our planet as well as we should have.

It is a proven fact that if we don’t reduce the amount of greenhouse gases in the atmosphere the climate will keep changing and we’ll face huge local and

It is a proven fact that if we don't reduce the amount of greenhouse gases in the atmosphere the climate will keep changing and we'll face huge local and global challenges in the future.

You told us reducing our carbon footprint is important and we listened.²

¹ Love This Place (2024-2034 LTP) Consultation Document.pdf. Page 19

² Zero-Carbon-Promise-2021.pdf. Page 2

1

Submission on proposed plan change 6. E A Lens

A global movement that needs a grassroots movement to succeed.

New Zealand has committed to the Paris Agreement and joined the global movement to reduce greenhouse gas emissions so the world will stay in the 'climate safe zone'.

To stay in the safe zone we need to limit the global average temperature warming to no more than 1.5° Celsius above pre-industrial levels. If the globe warms even half a degree more, this will significantly worsen the risks of drought, floods, and poverty for hundreds of millions of people.

New Zealand has set targets of zero net carbon emissions by 2050 and a reduction of between 74 and 47 per cent of methane emissions. The Climate

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New Zealand has set targets of zero net carbon emissions by 2050 and a reduction of between 24 and 47 per cent of methane emissions. The Climate Change Commission has produced its first Advice to the Government on how to transition New Zealand into a low carbon future.

Having zero carbon emissions requires balancing the activities that produce greenhouse gas emissions against the activities that capture carbon. Activities such as driving petrol or diesel vehicles produce emissions (carbon dioxide), while planting trees captures carbon. The more emissions we produce, the more balancing work we have to do – so the best thing to do is to start by reducing the amount of carbon emissions we produce in the first place.³

District Plan**Alternative Option 1 – Retain Current Provisions**

This option best meets the provisions of the District Plan, and precludes the detrimental effects explained under this option.⁴

The District Plan Section 5.6.3 (Urban Areas)

OBJECTIVE 1

To manage the development of urban areas in a way that maintains and enhances the physical infrastructure resource, encourages alternative modes of transport and **uses the least amount of natural and physical resources (including land and energy resources).**

District Plan**Alternative Option 1 – Retain Current Provisions**

This option best meets the provisions of the District Plan, and precludes the detrimental effects explained under this option.⁴

The District Plan Section 5.6.3 (Urban Areas)

OBJECTIVE 1

To manage the development of urban areas in a way that maintains and enhances the physical infrastructure resource, encourages alternative modes of transport and **uses the least amount of natural and physical resources (including land and energy resources).**

OBJECTIVE 2

To achieve an urban form for each urban area that maintains and enhances existing character and identity, **minimises reliance on fossil fuel use, protects areas** with significant natural quality, ecological, **heritage and cultural values and does not create or increase natural hazard risks.**

Section 5.7 of the District (Residential Zone)

OBJECTIVE 3

To avoid, remedy or mitigate any adverse effect of residential and non-residential developments on the environment and character of the locality.

Section 5.11.2 (Town Centre Zone)

OBJECTIVE 1

To ensure the development of business, retail and community activities and associated transport networks **do not create a detrimental effect on the**

³ Zero-Carbon-Promise-2021.pdf, Page 3

⁴ Application-Planning-Assessment.pdf, Page 68

locality.

Section 5.1.1.2 (Town Centre Zone)

OBJECTIVE 1

To ensure the development of business, retail and community activities and associated transport networks **do not create a detrimental effect on the**

³ Zero-Carbon-Promise-2021.pdf. Page 3

⁴ Application-Planning-Assessment.pdf. Page 68

2

Submission on proposed plan change 6. E A Lens

amenities of adjoining areas or lead to wasteful use of resources
(especially land and infrastructure).⁵

Sustainable mining?

The Application Planning Assessment document mentions sustainability numerous times, including in Objective 1.

However, mining is not a sustainable land use.

The Council must consider its actions with regard to long term sustainability.

Hauraki District Council Sustainability Policy 2010⁶

amenities of adjoining areas or lead to wasteful use of resources (especially land and infrastructure).⁵

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However, mining is not a sustainable land use.

The Council must consider its actions with regard to long term sustainability.

Hauraki District Council Sustainability Policy 2010⁶

The objective of this policy is:

3. OBJECTIVE

3.1. The Hauraki District Council has a clear responsibility to act, operate and develop in the most sustainable way possible. It recognises the critical importance of its impacts on cultural, economic, environmental and social well-being. The objective of this policy is therefore to improve Council's mechanisms for sustainable management on a continual basis and encourage the community to do so also.⁷

Item No. 8 SOCIAL IMPACT

I speak regularly throughout my submission on this subject. The average person in NZ (from many surveys) looks for the following 10 things in life: - Happiness; Health, Wealth & Security; Good family relations, friends and harmony; Meaningful work; To leave a legacy; Hope; Peace of mind; Fulfillment.

Through mining the residents of this area have had the quality of their lives impacted upon. Both with all of the resulting impacts but also with significant health issues caused by stress and other adverse effects of the impending expansion of mining in our area.

The public are continually needing to give their precious time and expense to formulating submissions (such as this) towards these giants of industry arriving on their doorstep. For example - My husband Dave is 87 and has been extremely ill for 3 months. He was finally taken into hospital on Tuesday 20/8 for a hip replacement. My time for this exercise has been extremely stretched. I am 73 with a heart complaint. We both are aware life is now short for us, is this treatment fair on the likes of ourselves?

There is also the negative impact on property values at this time when we may urgently need to sell, and for our neighborhood.

There will no doubt be a resumption in dust pollution. Damage to our property from dust and toxic

dust I.e. on cars, home exteriors, household items. The potential for increased traffic due to the proximity of the sites. Vibration causing damage. Vibration increasing due to underground tunneling, blasting, heavy machinery working close by.

Personal costs of having to constantly monitor our home and property for damage.

Potential future costs for us and others for legal expertise to protect our property to remedy effects.

Monitoring has been ineffective due to agreements made without public or affected parties input about why monitoring should change or cease over preceding years. For example the Waikato Regional Council agreeing to stop Waihi air quality monitoring despite the most complaints received prior to monitoring ceasing.

There is no long-term plan for the Tailing Dams and mining sites into the future after mining ceases.

Particularly, a community where there is no physical hazards to raising their children or disrupting a happy retirement. The people who reside in Waihi have put their trust in the Council, up to this point, to protect them and their assets from any adverse affects from this dynamic, explosive industry. Has it been well founded?

We do not believe so. Now, some people appointed onto a distant 'Team', has been given the power by government to decide our fate, to then wash their hands and pass the ongoing problems onto the Councils', we are told. You'll be right, it's not on any authorities door-step. I'm sure you are all being well recommenced by Messrs. Bishop & Jones.

Attached is a sheet Page 25, written by a resident in 2010 named "living in Waihi" A personal account you should read.}

Item No. 9 EMPLOYMENT

Every time I read a mining company revision of worker number predictions, those workers 'indirectly' associated increases substantially. Who is looking at the validity of these stated figures? Are we now looking at 399 jobs over their sites if consent is given and the figure is currently around 200. Over half of whom come from overseas (transient between here and Australia in fact) and would be professionals in their fields and have no problem with relocating. Their accommodations would be warmly welcomed. Over 300 properties owned by the Mining company. The attached map reveals how the companies are progressively buying up the town. As for the remainder, a government initiative could be instituted now. No doubt their skills gained in the industry would stand them in good stead wherever. Bare in mind figures and statistics can be shown to support any argument.

We lived here when mining was not taking place. There were cottage industries and several large business' came to town. With the disadvantages growing to living in the likes of Auckland we have seen many small business' start up from their homes. Waihi has attracted many elderly people on the whole. It will continue in this way with or without mining.

When locals voice their questions about the mining they have been shouted down with the likes of; If

mining goes so will the annual contributions made to sports groups and the schools; If it goes so will the jobs of the miners. Most of them have been imported anyway. I recently viewed the Mining Companies employment site - All bar one position was for qualified specialists positions, the one job to drive a truck, sought 2 years experience within an underground mine. Take a good look at what thrived in Waihi after the last closure. Via the Museum literature. Small and larger industry came to town. Cottage industry started. Tourism will be a major draw card etc. etc. It is a very desirable location with one of the most alluring beaches and walks in NZ.

Item No.10 ECONOMIC

Since 1988, 37 years now, the people of Waihi and surrounds have evidenced an industry enter its town offering very little in exchange for the upheaval to the community. Socio-economic levels remain low at 8.5 out of 10, the loss of three lives, where, I for one, have no idea of the details to these deaths.

It is without a doubt one of the main reasons yourselves and Council will weigh heavily, when making your decision. is the economics for the local and regional economy.

I would like to ask you all to listen to the interview Jack Tane held with Minister Shane Jones (The COG Government) Minister of Oceans 7 Fisheries, Minister for Regional Development, Minister for Resources, Associate Minister of Finance and Associate Minister of Energy. Whose hyperbole includes phrases like 'Dig Baby Dig' he is 'willing to make the trade offs.' It can be found on YouTube if you haven't already viewed it. I have also attached a copy of the script to my papers today. It is imperative that you also consider this information prior to making any Decision. This is my extractions:--

NZ currently exports \$1Billion from the minerals extraction (**mainly coal and gold**) industry. Mr Jones wants to double it.

Of this We receive 15% GST \$150,000 M

We receive royalties \$ 30,000 M

We receive PAYE say 30% **\$300,000** M – (Currently Employed within the industry are 5000, it will not double but only increase by 2000 workers. Therefore when Doubling reduce it by \$180,000)

A TOTAL OF **\$480,000** M which is less than 1, 400th of NZ GDP

Is this then a vehicle for transformation a further **\$300,000 M? Mr Tane asked.** (The \$480,000 less 180,000 as not doubling the staff) if increased then \$780,000M of which merely \$60,000M royalty to distribute.

It would be the royalties alone which he could distribute to the likes of the West Coast. (Not a mention for Waihi)

A study was done by Jeff Bertram (the last National govt economist) he analysed that the Income tax and royalties were only 4.4% of the total output. So by doubling the export to \$2Billion we were only receiving 4.4% in total output.

The Gold and Coal mines are owned by overseas companies. For which The Mining Profits and tax figures are not available in NZ, so we are unable to see just how much of that money is taken out of NZ

Employment in this industry is currently 5000 and would only increase by 2000. They are Highly skilled people and no training is given in NZ.

He openly proclaims he wants to exploit Mother Nature, bring it on he says, and the question was

put to him –

IS IT ULTIMATELY GOING TO BE WORTH WHAT COULD BE OF A POTENTIALLY LIMITED ECONOMIC BENEFIT.

Mr Jones believes it would be transformational to an area such as Westport. Since going to press an article has appeared on Wed 4 Dec within the Newsroom headed “All of Government’s 2024 coal earnings spent treating damages at a single mine.” This is at the Stockton West Coast mine. They have further applied for a Fast-Track extension. Ask yourself. <https://newsroom.co.nz/2024/12/02/all-of-govts-2024-coal-earnings-spent-treating-damages-at-a-single-mine/>.

He sees – quote “the downsides as People (mining companies i.e.) need to mitigate and clean-up after they’ve finished mining. When a miner doesn’t restore, mitigate to ensure that the area of land, which on dock estate is currently 1500 hectares, do not restore it.....” he garbled and tapered off with this answer.. (Ask yourself again - restore it?) Mr Jones needs a few lessons on the mining industry.

It was put that Other industry is 37 times more valuable than mining at the moment. International tourism is 10 times more valuable. The NZ Green Image is vital. So what impact will doubling our mining operations have on that reputation? His response was - “It would only be the size of a beauty spot on 8 million hectares of dock estate. It’s irrelevant.”

What if something goes wrong, Such as the The Tui Oil Field which cost the Government almost half a billion to clean up. What would the impact be on our image? He Said Jack was catastrophising.

Jones said THAT “I THINK WHAT’S PENETRATED IS THIS DOOMSDAY THINKING and THAT THE INDUSTRY DON’T VALUE THEIR SOCIAL LICENSE.”.....

Economic figures can be made to fit a desired outcome! Keep that to mind when considering Consultant’s economic reporting.

Here is a well reasoned submission made by Dr Christina Howard to the OGM Zone Plan Change of expanding the Martha Pit, which, of course, this application also extends and the same planners etc. reports apply:-**ECONOMIC - Submittor 35 - Dr Christina Howard**

35.8 35.10
Social and Economic Impact:

WSP notes that "The Waihi mining operations result in direct local benefits as a result of overall expenditure and the use of local service providers. This does not appear to translate into widespread direct economic benefit within Waihi and the local area, probably because Waihi and the local area's lower median personal income is likely to be a result of the age profile of the population (higher older population) and higher than average employment and Not in Employment, Education or Training (NEET) rate."

35.9
 HDC is in the fortunate position of being able to judge the social and economic benefits of mining activity based on actual performance to date, rather than hypotheticals. Both the social and economic impact reports provided note that Waihi fares worse economically than local and national averages while at the same time claiming that mining brings both direct and indirect economic benefits to the town. Similarly both try to discount the fact that Waihi's socio-economic decile rating is very low (8.5/10) by suggesting that it is the result of other factors (e.g. greater older population) without offering any strong evidence for these suppositions.

An alternative, and more likely, explanation is that the high mobility of mine employees, plus the fact that the mine's profits accrue to overseas owners, means that very little of the wealth of the mine stays in Waihi. There is a constant inflow and outflow of people in the town as mine workers transfer to/from overseas to take advantage of better opportunities elsewhere. As noted in the reports, many of the mine staff also chose to live outside of Waihi, including many who live outside of the Hauraki District itself. As a result, little or none of the economic benefit of the mine stays in the place where all of the adverse impacts are felt.

35.10
 Based on the evidence of continued low socio-economic indicators in the town over the last 35 years, it could be argued that the mine has in fact had a **negative economic impact** on the town's economy and that restarting active surfacing mining will do so even further. The disruptive effects (noise, dust, vibration) will make the town itself a less attractive place to live and work, further depressing house and land prices and discouraging the development of other businesses which could provide better employment opportunities and more

Item No. 11. PROPERTY VALUES

The affects on property values has never received the importance and scrutiny it demands. Continued uncertainty about the future expansion of mining etc. keeps the values low particularly fuelled in periods of the Open Pit mining. It is only commonsense which tells us this would be the case. The mining company states it had/has a 'Top Up' management measure as a way of mitigating the impacts on property values. I have not been able to view anything which lays out the methodology etc. of this. E.g. Does it apply to 'all' of WAIHI or zones? If a landowner raises a concern about this to whom do they appeal? How is this advertised to the populous? Where are application forms held? Etc.

We personally paid the capital value for our property, the 'real estate' agent acting for the seller said we could apply for a Top Up, where an extra amount would go to his client on top of what we pay, we were happy to do so. We signed a paper which stated words to the effect that we would have been unable to purchase the property without the Top-Up and not reveal the amount. Very confusing.

In the hands of real estate agents is it?

You must demand that this process be covered within an explanatory document available to all land owners.

Not remain a secretive process. After all you are trusting that this process will appease the citizens of this demonstrable affect to their homes when you consider the mining affects of an application.

People have been attracted to Waihi in periods of low exposed mining activity, the lower property prices and situation of the Town is alluring. Confident in the assurance that the large pit will be closed in a particular year.

Property values will certainly be taking a hit at this time. This subject should demand its own consultant report, I could not locate one?

All I hear talked of, within a Consultant's report was that the Mining Company had a 'Top Up' system. Have you taken the opportunity like I did to view this? It holds No prescription of what / who / how / where you view this policy? It is a secretive process.

I managed to **procure a copy of the Oceana Gold Mining Project Martha Property Policy – A copy is attached to my papers.** There is no mention of:-

- i. The area which this policy covers? No Map? We hope it is for All of Waihi.
- ii. What The policy refers to?
- iii. Do the property owners within Waihi receive an annual reminder of this policy?
- iv. How do Waihi Property Owners know about this policy, how to access it, to study its details?
- v. Where do they obtain an application form and deliver it to whom?
- vi. Within all of the impact surveys conducted to date are the respondents asked if they are aware of this policy and whether they have viewed it etc.?

An independent Real Estate Valuer surely should be monitoring this and applying objective reports regularly to the - last item within their Martha Property Policy – Is Headed 'The Waihi Community Consultative Group' and an internet site is provided which provides 'The Terms of Reference' for this Forum – a copy is also attached.

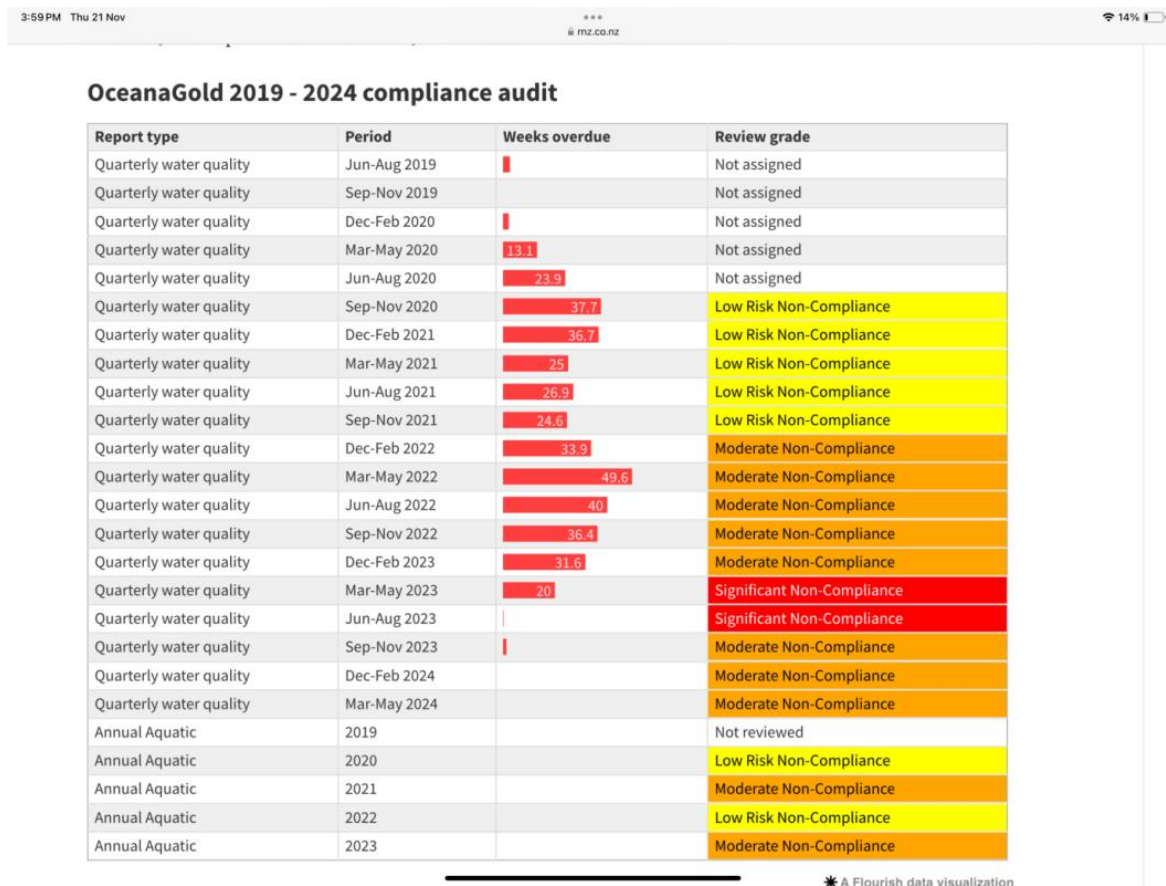
I believe it has not operated as a public forum for some years now. Its constitution was changed. Even when it did, the community was insufficiently informed on the detail to how / what / where etc. it operated.

The Objects of the Forum they espouse to be:-

- (a) Administer the Property Purchase Fund through the IRP (independent Review Panel) appointing and managing IRP members and reviewing IRP performance and property purchase criteria;
- (b) Consult with the community on IRP property purchase criteria;
- (c) Consult with the community and the Consent Holder to develop and implement initiatives that can be funded through the Streets Ahead Program (a program for Community betterment in the Waihi Ward); and
- (d) Report, receive and respond to comments on community issues relating To the Consent Holder's operations in Waihi.

I reiterate that the numbers that (i) to (vi) above are all required to be answered NOW and a new system be developed in accordance with my recommendation of a New Community Consultative Group proposed earlier in my paper, would take over from the Forum with a separate membership Forum for an IRP and report back to the Group and to the new newspaper for public awareness.

Item No. 12 MINING COMPANY HAS LOST IT'S SOCIAL LICENCE



The Mining Company has shown to have a shaky history complying with consent conditions per a recent audit of Oceana Gold's Sth Island MaCraes Mine (As reported by Radio NZ on their site on 14/11/24 (<https://www.rnz.co.nz/news/in-depth/533692/fast-tracked-gold-mine-has-shaky-compliance-history-audit-reveals>))

The Oceana Gold Mining Company has lost any social license to operate, since it decided to apply for a Fast-Track mining license on their North Project and another in the South Island.

By so doing, it has pulled out of consultation with the community at the first opportunity which came along. So much for their fine rhetoric within the company statements.

There was no reason to Fast Track the North Application.

Any delays in holding a hearing was on their shoulders as Council awaited the return of further information from them.

("explanation of a - Social license to operate (SLO) is a concept that refers to the level of community approval and trust that an organisation or individual has to operate in a given area. It's not a legal permit, but rather an informal social contract between a community and an organization that indicates that the organization is living up to the community's expectation

Item No 13. RISKS POSED BY MINING ACTIVITIES

Past accidents in the Waihi Mine:-

- a. There have been many accidents over the years. The Deaths of John Bennington 1903, Nicholas Andrew Moncut 1999 of Whangamata Douglas Takerata Pourau 200, Tipiwai Stainton in 2016.
- b. Slumping – House falls into a 50 metre by 15 metre hole December 2001 – 26 homes lost due to the sinkhole subsidence.
- c. A 35 tonne truck engine fire in the Trio Underground Mine 2012.
- d. A huge Martha Pit wall collapse 2015, yet to be emedied...

Past Local

- e. A tailings failure could be catastrophic? Tailings dams have failed all over the world. The Tui Mine at Te Aroha was considered one of New Zealand's most contaminated sites. The site consisted of a 1.5 ha tilings dam containing 100,000 cubic metes of toxic mining waste.

What could the legacy of the tailings growing in the Waihi area be for the future? Is it worth the risk?

Item No. 14. COUNCIL IS COMPLICIT WITH THE MINING COMPANY

The community is being told constantly in one way or another that Council has it in hand, that they act in the town's best interests. You only need to read within all of their Policy Documents, objectives etc. to see they are industry, in this case, mineral extraction focused.

What has been done by Councillor's for the people of this town since these mining licences were given, other than to lobby for contributions on a small scale?

Otago is an example of how in the past the mining royalties were awarded to the Council who in turn voted to built the first university in NZ – the Otago University; Waihi similarly received these in the past.

I was shocked recently to view a short documentary about the mining in Waihi. When the helicopter flew up to the Mine the interviewer asked the Mining Co staff member "is it usual to have a mining pit where houses surround it?" her answer "Oh, the houses were built after the pit was there." Oh lordy, lordy, lordy.<https://youtu.be/CV9V4nfhXk4>.

A prime example of Council's complicity with the Mining Industry is evidenced when The Council issued a lease, at a peppercorn rental of \$1, for 45 years to the Mining Company over the paper roads which they needed before considering their North Project. With no regard for public opinion. This was pointed out by the Planners, as being a negative to proceeding with this lease with no heed given, as who would ever know. I believe one Waihi Councillor at the time did dispute it, to no avail.

Closures of paper roads can cause concern because they restrict public access to these rights-of-way, which are intended to remain open for passage. Now DOC has closed off sections of the Coromandel Forest Park for OceanaGold to explore until 2027 on the pretext of public safety. How much more PUBLIC land could be closed and for how long could this continue? Is this the thin edge of the wedge?

FURTHER, Council repeatedly commented that no work could be undertaken without a resource consent. I could supply you with much documentation of the work which has been carried out to date. Obtained through requests of the Conservation Dept and Hauraki District Council and WR Council

ITEM No. 15. MINING ROYALTIES

Refer to an attached news article which shows just how much money the town once received in gold duty

and goldfields revenue annually up until 1912 when the Miners Strike took place it then ceased. One year the payments came close to the year's annual income. Waihi Borough was subsequently given the miners cottages and land at Waihi Beach which were gradually sold adding more revenue.

New Zealand is reaping any benefits from the mining of Waihi, Waihi which is stealthily being turned into one big tailings dam!

THE ROYALTIES paid to the government need to be radically increased, and finally, stipulate a large percentage to be paid directly for Waihi. This, you The Hearing Team, can do as a specific clause within the conditions of any consent. This is a well overdue condition.

ITEM No.16. MARTHA TRUST

IT is time to enlarge the reinstatement amount for the Pit held within the Trust. And produce a reinstatement plan NOW. SAME for this project if you grant any license. Please explain to us what the reinstatement work will entail and a costing for now and for the planned date of closure? Let alone any additional open mining..... The people who form the committee on this Trust now needs to be replaced some years have passed since its inception. It is time for Waihi to have independent representation and it be majority representation. Also, be required to incorporate the, yet to be produced, which was a condition of the original Mining Licence – The “Cultural Balance Plan”.

ITEM No.17. PLANNING FOR THE MINE CLOSURE - POLICY NEEDS TO BE PREPARED PRIOR TO ANY THOUGHTS OF EXTENDING INTO ANY NEW ACTIVITIES

RATES - It is an unsustainable venture and will be ending. Is Council or yourselves now being proactive in planning for this? What is Council doing with the 0.8% (say 1%) of rates struck in any one year (last year on my workings of the rates struck of \$47,676,000 @ 0.8% = \$381,408), known as the Mining Contribution, (I believe it was agreed at the commencement of the operations and it signifies an agreement to the value of the rates payable on the land which the mining activities operate upon, as it is Crown owned and unrateable. This rate is a condition of the MML. It is separate to the rates they pay on the properties they own.

Is Council then simply applying this money (lets see, for 36 years my estimation would be – Starting from when I last recalled the amount to be around \$112,000 in 1990ish so I based a low estimate on an averaged amount of \$200,000 p.a. for 38 years equates to \$7,600,000.) This year alone it was \$476,760.00. What has it been spent on? Is it being applied to the districts rates? If so it is preposterous. It is Waihi which sustains the affects. What then happens when mining goes, are the ratepayers going to be in for yet another magnitudinal rate increase? Already, we read that this years' accounts show a \$17M deficit even after a 17.5% or more increase.

The Team is requested to stipulate that the greater percentage of this mining rate be spent in Waihi, and it form part of this Application in the same manner for which Council's consultants considered the two other financial payments towards restoration.

Item No. 18. THE REINSTATEMENT PLANS

We have yet to see any plans for when the mining in Waihi ceases. A new Plan is required. It Also needs to be discussed not simply with yourselves but with Council's and the community, reviewed, prepared and adopted within this application prior to any consent.

Item No. 19. NEWSPAPER INITIATIVE for WAIHI PLUS A MINING CONSULTATIVE GROUP

Proposal for a Waihi Newspaper Plus a Mining Consultative Group

It is time now that the Council and/or Government/Mining Co via donation, provide an independent newspaper again for Waihi. Together with a public consultative office to house the new paper, along with a new Mining Consultative Group, to oversee this, run by local people in the town, not the mining company nor the Council nor business. Employees / maybe Journalists from an existing newspaper say wishing to transfer here / and the likes, be appointed by the Group. The paper, as well as provide local news, would cover all Council meetings / Mining Co consultative meetings and report on same. Perhaps be a District entity and may even pay for itself in due course.

To Also consult / seek information / etc. on behalf of those whomever approach the group on mining issues. My suggestion can be built upon of course. That the community representatives to form the Group are voted on by the community, and cannot be either employees of the Mining Company, Council or business people.

I have excluded people with a business as it was viewed that the old Forum was taken over by these interests. Maybe 1 member from this area, with the Group Objectives, could stand. All would be thrashed out.

Voting could perhaps be at the same time as the LG elections.

This is of great consequence and well overdue as the people of this town are floundering and trying to put a brave face on this mining invasion and in many instances burying their heads in the sand.

These matters should similarly be accepted within any conditions to be considered prior to any consent being considered, perhaps form part of the social, impact requirements.

The new Waihi Community Consultative Group I proposed would take over from the Forum with a separate membership Forum for an IRP and report back to the Group and to the new newspaper for public awareness.

Item No 20. SHEET OF QUESTIONS AWAITING ANSWERED and told finally TO ASK YOURSELVES:-

“From: Leigh Robcke

Sent: Monday, 18 August 2025 8:44 am

To: Gloria Sharp [REDACTED]

Subject: RE: Questions re Nth Project

Hi Gloria.

There is quite a bit of work involved in answering the questions below, and I don't have the time at the moment.

I will try and sketch out some brief answers later today but, if you have concerns about these issues then they should probably form the basis of your comments to the Environmental Protection Authority.

Regards

Leigh Robcke

kaiwhakamaherehere whakatakanga matua

Senior Project Planner

[REDACTED]

Hauraki District Council

1 William Street, Paeroa, 3600 | PO Box 17, Paeroa, 3640

ph: (07) 862 8609 or 0800 734 834 (from within district)



From: Gloria Sharp [REDACTED]

Sent: Friday, 15 August 2025 10:06 am

To: Leigh Robcke [REDACTED]

Subject: Questions re Nth Project

Kia Ora Leigh, I was wondering when I might receive your answers to these questions, I sent? Thanks

MINING - QUESTIONS OF LEIGH RE NTH PROJECT

- What is the long term plan for the Tailing Storage Facilities? Copy please? Same for Mining Sites? Including after the mining ceases?
 - How does the Gold Co intend to contain the dust from the tailings dam constructions?
 - Will there be dust monitoring and where will any monitors be placed, are they telemetry? How often will they be read?
 - Conveyor belt - I believe it is to be enlarged? Is it to be completely sound insulated? If not do they intend asking for a noise level in the license? If so what is it?
 - Where does the proposed tunnel commence?
 - How do they intend to prevent dust traveling re the new Gladstone Pit?
 - How is the Co going to prevent noise particularly from the excavation of Gladstone hill and tunneling? Will there be 24 hr a day noise monitors with alarms? Same as dust?
 - Light pollution - how will this be prevented? How long does the company wish to operate? How long does the company wish to keep the lights on? How strong will their lights be?
 - What will be the hours and days of operations requested for the various sites and conveyor belt?
 - Will there be any blasting felt? Will any vibration be felt? Will there be 24 hr a day monitoring for these? Who will receive the alarm when it occurs?
 - Will there be any increase in traffic down our road or others?
 - What affects can be expected by us and Waihi population/properties?
- Gloria J Sharp JP (Ret)

ITEM No. 21 SUMMATION

1. In Consideration Of The Following I Herewith Submit That It Is Imperative That :-

- a. ***Air Quality*** be monitored on every property in Barry road to include PM2.5 and PM10. That Alarms be set to ring if they detect any of these

substances or if they breach any conditions.

b. Monitoring

i That a full-time, suitably qualified, independent person be engaged by (all costs borne by the Oceana Gold Mining Co) to monitor all conditions and report back to said Councils, that a publicly accessible internet site be maintained with all monitoring reports plus all mining related matters and documents contained therein.

ii That the new Waihi Community Consultative Group in conjunction with the newly appointed Monitoring Employee issue a regular newsletter to the town (maybe incorporated in the new newspaper) Plus hold regular public meetings.

ii There be monitoring at all sites of the Co2 emissions.

iii The Conveyor Belt be fully insulated so there is NO sound emitted.

c. Mining Royalties - The Waihi Community receives a generous share of the royalties.

d. Mineral Rates - Be spent in Waihi and the Waihi Ward Councillors make determination on what the funding is to go towards.

e. Martha Trust & Restoration of the All Other Mining Licensed Land Fund be substantially increased once all Reinstatement Plans have duly been presented (after my recommendations have taken place) and funding deliberated upon by HD Council. That this be regularly updated and increased appropriately.

f. THE CROWN must become the insurer of last resort to cover all finances required for mining related matters, be it reinstatement, maintenance and ongoing monitoring of all sites in the event that the mining company fails in its duty.

g. A New Waihi Community Consultative Group be formed, taking over from the present WCM Forum, to also create a subcommittee of same for the current 'Top Up Scheme' to be funded by the Mining Co.

h. A new Waihi Newspaper be created in accordance with the pre-requisites as discussed earlier in this submission.

i. A Reinstatement Plan form part of this application and be produced as per my recommendations, prior to any final deliberations on the application.

j. Hours of Work At the Process Plant - There can be NO workings within the Processing Plant area or Gladstone Hill area in the weekends or Public Holidays

That during the week Monday to Friday the hours of operation to be 7.30am to 5pm

k. AMOUNTS payable by the Mining Company for any breeches of its conditions. These need to be increased markedly primarily as a deterrent. Any disturbance to the quality of our enjoyment of life be it; additional noise

(as each individual determines); any vibration; any blasting; light pollution; any changes in general, need to be immediately and suitably remedied. To make it clear 'We do not want any.'

You cannot proceed with considering this Application without first guaranteeing all that I have requested.

- l. That any property owner within this area of impact*** be given the right to sell their property to the Mining Co at market price plus TopUp plus a 10% loading for the trauma of having to do this Plus the payment of relocation and legal costs.
- m. Should the Waihi North Project*** or aspects of it be approved we wish it stipulated that regular public meetings (three monthly) be held to update interested parties about activities and to provide feedback to OceanaGold. Meetings to be organized and convened by an independent professional and not held on OceanaGold Property.
- n. OceanaGold legal staff***, representatives, affiliates or anyone associated with them are not to write or manage documents or conditions for any consultation groups or the Martha Trust.
- o. That all documents related to mining activities*** are kept in a document archive so that any changes over time can be compared to previous conditions/documents as when conditions have changed in the past, documents have been deleted and become unavailable to the public.
- p. That the Hauraki District Council*** must ensure that all relevant Waihi North Project documents are archived online and publicly accessible.

2. FURTHER That The Application Be DECLINED On The Following Grounds (To Name But A Few – I required additional time to study the various Acts etc. & compose the substantive list):-

- 1. The Application is in contravention of the District Plan of sustainability which states:-
“The objective is to provide for the utilization of the mineral resource, and the rehabilitation of natural and physical resources affected by mining activity, in a **SUSTAINABLE** manner.
Sustainable definition – “Capable of being sustained. A designating, of, or characterized by a practice that sustains a given condition, as economic growth or a human population, without destroying or depleting natural resources, polluting the environment etc.”
- 2. That the concerns of the Waihi Citizens have not been called for by this Team and that only a chosen few were given a mere 20 days to comment upon such a vast project. It smacks of dishonesty and has, up to this point in time, been viewed as illegal.
- 3. That there is no Consultants report on CO₂ emissions. It does not comply with the 2024-

34 Council Consultation Document for zero carbon.

4. It does not comply with Council's Sustainability Policy.
5. There is a high possibility of severe impacts on the Townships water tables and water supply. Plus detrimental affects to the Ohinemuri River particularly at the companies discharge areas.
6. That there will be too great a number of Tailings Storage Facilities in close proximity. Their height and extent of land coverage are only disasters waiting to erupt. Their ongoing maintenance will be too great a burden to carry. If they fail and under my own estimation with all considered, including the effects of climate changing, they will, then the resulting catastrophic failing is rated 'High'.
7. If my proposed permanent Waihi Based Monitoring Officer is not engaged it will again, and more so, be open slather for self monitoring determinations, this time on a far greater scale. Council's are not taking this seriously enough, therefore a permanent on-sites Council staff member urgently needs to be appointed, without this happening these ongoing mining projects carry too many risks to warrant consents.

We cannot continue to place the 'mighty dollar' ahead of the laws of the land and of the greater protection of our people and the environment. When one avenue for profit is ceased (e.g. gold extraction ceases) mankind always finds another way to fill the void.

After all, Is gold really needed? Particularly ahead of what will be given up to obtain it? Please refer to the article below which is a must read for yourselves:-

I sincerely thank you all, for you forbearance at reading my submission and I trust that what I have laid before you will more than substantiate, your adoption, of my recommendation to decline this North Project Mining License. Where the community can continue to thrive and live in harmony. And not be forced to endure such an upheaval, particularly over so many years, which all tolled is unendurable.

Yours faithfully,
Gloria J Sharp JP (Ret)

ITEM No. 22 From the Writings of Christine Mallett - Living in Waihi

From the writing of Christine Mallett February 2010 named 'Living in Waihi A personal Account'. (attached) Just to mention a couple of snippets - Which read - 'it's a mining town, you should have known...' Like, known better?

- So who would I find that key information from? There is literally nowhere else like Waihi where I could have found out what I know now. Here's what I should have known:-
- I should have known that a Mining Company is never going to leave.
- I should have known it was minimum mining royalties paid to the Government.
- The sick will breath the dust etc.
- The noise of daily blasting and the continual 12 hour a day loud operational noises from

machines which are likely to be suffering from maintenance.

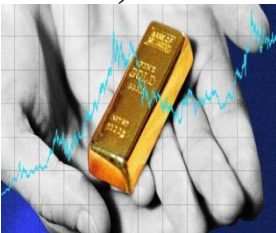
- **"If you have a barking dog and one person complains you will have to solve that dog's noise asap or lose your dog. If you own a mine and 600 people want it gone you can carry on totally unconcerned and do exactly whatever you want because – guess what? If you are a big enough business NONE can live long enough and have enough money to afford the fight to shut your mining down."**
- I should have known that the conditions of the license cannot be altered.
- **I should have known Consent conditions like noise levels of 50DB – equivalent to your neighbor mowing the lawn all day every day is the acceptable noise level. Construction noise levels can be up to 70 DB – which is so loud you have to shout to be heard.**
- I should have known that the noise of the rock crusher and mining carried in the wind for amazing distances....
- I should have known the effects of de-watering.....
- **I should have been able to guess that there would NEVER be any plans to compensate Waihi Residents for the awful stresses and uncertainties involved in living in a mining town....**
- I should have known that the 'final stability cut' which the mining company is doing is actually slowly falling into the open pit and the old workings beneath. There are council pensioner flats right next to the most actively slumping part which has a crack in the road 80 meters deep...

And her stressful story goes on. Full copy attached.

Related Articles -

- 1.** My letter to Jacinda Ardern dated regarding this mining license.
- 2.** What's wrong with mining at Wharekirauponga – a few thoughts:- **The original document can be found on the following site - <https://www.watchdog.org.nz/whats-wrong-with-mining-at-wharekirauponga-a-few-thoughts/>**
- 4.** Copy of transcript of a Jack Tame interview with Shane Jones re mining. Attached within email.
- 5.** "The case for leaving NZ's gold in the ground"

Tom Pullar-Strecker
June 13, 2024



The majority of mining companies that the Government provided information on fast-tracking applications are interested in opening goldmines or coalmines.

STUFF

ANALYSIS: An interesting argument is being put forward to support mining's inclusion in the Government's proposed fast-track consenting regime that is less about self-interest and more about altruism.

The world needs minerals, in part to make electric vehicles, wind turbines and solar panels for the "energy transition", but New Zealand isn't currently doing its fair share.

Josie Vidal, chief executive of mining industry body Straterra, told Parliament's environment select committee this week there would be [no energy transition without mined minerals](#).

"In a world that requires more minerals, it is not appropriate for New Zealand to sit on its mineral wealth and expect everyone else in the world to provide."

More than that, mines here should have higher environmental and labour standards than those elsewhere in the world, she says.

Vidal hasn't posed the following question, but if it's a choice between New Zealand dotterels and Africa's great ape population, which should we choose?

Research led by Germany's Martin Luther University warned in April that a third of the great ape population is currently threatened by copper, lithium, nickel and cobalt extraction in Western Africa.

The "better here than elsewhere" argument for mining provides food for thought, perhaps, but it does rather depend on the specifics of the mineral in question.

[MORE FROM](#)

[TOM PULLAR-STRECKER • SENIOR BUSINESS JOURNALIST](#)

tom.pullar-strecker@stuff.co.nz

New Zealand doesn't have known large reserves of cobalt or lithium, which are two of the "problem" ingredients needed to support the energy transition, Vidal concedes.

The majority of mining companies that the Government [wrote to in April](#) to provide information on fast-tracking applications are instead interested in opening goldmines or coalmines.

There is, or at least was, something both gritty and romantic about the prospecting and mining for gold, which was one of the key activities on which the nation was founded.

Much of the former and almost all of the latter may have given way to giant machines, cyanide leaching and cold economic equations.



But do we have a duty to mine it to chip in and help the world transition to a 'greener' future?

Gold doesn't appear to be commonly used in solar panels outside of solar arrays attached to satellites in space, but it is used in very small quantities in printed circuit boards in EVs, and in electrical interfaces in wind turbines.

The big ethical downside of goldmining is that it is extraordinarily energy intensive.

Researchers from the University of Nevada estimate mining and refining a single kilogram of gold generates 12.2 tonnes of carbon emissions.

Very much like the linkage between bitcoin mining and the price of electricity, it is the cost of oil versus the market price of gold that is one of the biggest determinants in whether it is worth digging it up out of the ground.

In 2018, 20% of the operating costs of the world's five largest mining companies were directly accounted for by energy costs, according to research by Toronto-listed firm Goldmoney.

But it estimated that when indirect costs were included, about half of the production costs of the average goldminer were closely linked to energy prices.

The lower the concentration of gold being mined, the worse the energy trade-off, but because the price of gold has roughly doubled over the past 10 years, it can now be economic to mine gold even where it exists in very small concentrations.

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The lower the concentration of gold being mined, the worse the energy trade-off, but because the price of gold has roughly doubled over the past 10 years, it can now be economic to mine gold even where it exists in very small concentrations.

In March, it estimated it contained 972,000 ounces of gold at a concentration of 2.5 grams per tonne, which Santana describes as "outstanding".

To help visualise the concentrations we are talking about here, gold, with a specific gravity of 19.3, is about seven times more dense than the schist rock common in Central Otago.

Santana would therefore need to extract and smash up about a double-garage sized volume of rock (210 tonnes) to extract 525 grams — about 5½ teaspoons — of gold.

Do we need it that badly for the green transition?

Last year, according to the World Gold Council, less than 300 tonnes or 7% of the 4448 tonnes of global gold production was used to make what could be described as useful stuff.

The rest was roughly equally divided into making jewellery, or gold bars and coins held by central banks and other investors.

In a more usual year it can be about 10%.

Either way, that translates into only about half-a-teaspoon of gold in that double garage of rock being put to an obviously useful purpose.

According to the United States Nasdaq stock exchange, central banks alone hold just under 37,000 tonnes of gold, which based on last year's consumption would be enough to supply the industrial demand for gold for more than 120 years.

Certainly, there is no need in at least the next few millennia to dig up more to make EVs or wind turbines.

Peter Sharpe, chief operator officer of the country's largest goldminer, Oceania Gold, makes the point that even gold that is just sitting in the vaults of banks is performing a task of sorts.

That gold is designed to be "a store of value", giving financial markets confidence in local currencies and providing a last resort means of exchange if an apocalyptic crisis turned all the world's paper money into Monopoly money and we were all living off fried rat.

The snag in using that as a justification for mining is it doesn't necessary follow that function is better fulfilled by anyone mining more gold.

Gold is freely tradeable and almost infinitely divisible and its value per kilogram as a store of value should be an exact inverse function of the number of kilograms of gold there are in circulation.

Having more of it doesn't increase its overall usefulness as a store of value or means of exchange for the same reasons that bitcoin has managed to become a store of value precisely because the volume of the digital currency that will be "mined" is capped.

The awkward irony about gold is that its value does rise on the back of conflicts and geopolitical concerns, which can be expected to be increasingly linked to climate change.

It is an allegory for the human condition, perhaps, that the worse climate change gets, the greater the financial incentive to dedicate more precious energy to digging up the shiny metal and sticking it in a vault. **At what point does that get silly? Is digging it up at 2.5 grams per tonne silly enough?**

Perhaps the only ethical case that could be made for mining gold in New Zealand right now is that if that was less energy intensive than the mining of gold that would otherwise take place elsewhere, then it could displace some carbon emissions.

But the bigger truth is we'd all be doing ourselves a favour if we collectively agreed to leave what's still left to be mined in the ground for a while."

Gloria J & David N Sharp



Members of the NZ Labour Government

4 November 2022

Dear Members

I am writing to solicit your support in ensuring that what our PM Hon Jacinda Ardern pledged to New Zealanders in 2017, which was not to permit any mining on Conservation Land, is adopted and mandated.

On the 15th September 2021 the Hauraki District Council granted Oceana Gold Co a 40 year lease, at \$1 per year, to 'paper roads' land (subject to RMA clearance) to enable the company to proceed with their North Mining Application once RMA given. The CEO cannot identify the land given this lease.

The public nor the local Iwi were consulted. HDC Agenda wrote "Staff consider that the Council does have enough of an understanding of community views and preferences on this matter. The level of engagement considered appropriate for this matter, at this point in time, is not to engage." "IMPLICATIONS FOR MĀORI - The decision DOES NOT involve a significant decision in relation to land or a body of water. - The licence to occupy does not indicate tacit approval to enable OceanaGold to do what they wish within the road reserve, as RMA processes must be followed for how the land is utilised."

I was only aware of this by coming across a news paper article recently. As far as we are concerned, Council having railroaded this through, are seen to be giving tacit approval to this mining proposal! We have been waiting since 2020 for more information on this mining application. I have ascertained that the mining application may go straight to the Environmental Court. We (the community) may have no avenue to have a say! There is now no real local newspaper. What there is covers other areas in the main.

It has now been five years since the new Prime Minister Jacinda Ardern promised through the 2017 Speech from the Throne that there would be no new mines on conservation land.

It has been 12 years since Jacinda Ardern, as an Opposition MP, marched down Queen St carrying a placard "Ours Not Mines" against mining on conservation land

After years of pressure from the Greens, iwi and hāpu, community and environmental organisations, and tens of thousands of New Zealanders, Parliament has the opportunity to pass legislation to protect public conservation land and waters from mining, and keep coal in the ground to protect our climate.

Mining on Papatūānuku for gold, coal and other minerals can have devastating impacts on nature. It can permanently change landscapes, remove mountain tops, and crater the land. It can involve stripping the land of its forests and native vegetation, and degrading or destroying the homes of vulnerable wildlife such as the giant land snail in Buller, and the Archey's frog in Coromandel.

Mining operations can pollute local waterways with sediment and create waste rock stacks prone to acid mine drainage. Processing ore to extract gold can lead to arsenic, mercury and cyanide pollution. Big mining operations have tended to be boom and bust, leaving local communities to deal with the aftermath of a sudden loss of jobs. I am currently awaiting information from the Waikato Regional Council on how I can access all of the mining licence monitoring reports for this mine. In particular the dust.

Instead of continuing to plunder our environment, we could be encouraging more “urban mining” of electronic waste. We can create new jobs, reduce waste to landfill and protect nature by recovering precious metals such as gold from computers, mobile phones, batteries and other e-waste.

I understand this Government has chosen to prioritise the reclassification of stewardship land and changing its legal status ahead of protecting conservation land from mining. However, time is running out for our precious places and wildlife, particularly in the Coromandel where companies such as Oceana Gold are preparing to expand their gold mining operations, including blasting and tunneling under precious native forests on conservation land which are home to the endangered Archey's frog and brown kiwi.

We live very close to the proposed new Open Pit the company plan. Having undergone 3 to 4 years of underground blasting we are not happy at all if this project proceeds, not to mention the additional environmental damage and ongoing monitoring required.

Contrary to the hyperbole there is more than the Archey's frog in this area - here is a copy of the DOC letter regarding the lease of paper road application – (it was impossible to copy the letter from the HDC website Agenda so took screen shots)



The Wharekurauponga Forest is a contiguous ecosystem of high ecological values and cultural associations.

In such a sensitive environment, the D-G is keen to ensure that any decisions made are robust, transparent, protect the values of the area and are made with adherence to the legislative mandates within which Council and the Department of Conservation (DOC) respectively operate.

To this end, DOC has provided a response based on the information provided by Council. DOC notes key information previously discussed and anticipated, has not been forthcoming, including:

- Details of the Council's decision-making framework for Licence to Occupy applications.
- Details of Tangata whenua: Iwi, hapū and whānau consultation for this decision-making process.
- Details of any ecological assessment information to support the draft schedule of conditions.

1. Details of the Council's decision-making framework for Licence to Occupy applications.

DOC previously sought clarification of the framework under which Council intends to make its decision, and were advised that this information would be made available. This has not occurred.

The D-G still seeks this clarification, and considers the Council decision-making obligations under the Local Government Act 2002 (LGA) sections 4, 77, 78, 81–82 to be of particular importance.

In the wider context of OGL's projects, the D-G has strong concerns that the issuing of a licence to occupy permit will have decision-making implications for Council and for DOC under our respective legislative mandates that are not being contemplated in this process.

While the licence to occupy limits OGL to permitted activities under the Hauraki District Plan, the D-G considers that the licence effectively shifts the decision-making process away from

DOC's legislative mandate which is to ensure the conservation of the Wharekurauponga Forest ecosystem.

The licence (similarly with access arrangements issued by the DOC) is ancillary to and serves no purpose until the determination of the activities subject to the resource consenting process.

In summation, the D-G does not consider it appropriate for the assessment, particularly of ecological effects, to be deferred until such time as resource consent applications are lodged.

2. Details of Tangata whenua: Iwi, hapū and whānau consultation

Council have indicated: *"no requirement to consult with others as this is not a public process."*

The D-G disagrees and still seeks clarification of Council's decision-making framework, particularly as section 4 of the LGA references Part 6 principles and requirements for local authorities to facilitate participation by Māori in local authority decision-making processes. Section 14(1) of the LGA – In performing its role, a local authority must act in accordance with the following principles: (d) a local authority should provide opportunities for Māori to contribute to its decision-making processes.

Further, Section 77 of the LGA – requires a local authority to assess the options in terms of advantages and disadvantages; and take into account the relationship of Māori and their culture and traditions with their ancestral land, water, sites, waahi tapu, valued flora and fauna, and other taonga. The D-G considers Māori (Tangata whenua: Iwi, hapū and whānau) are best placed to speak to these matters.

In carrying out its functions under the Conservation Act 1987, DOC's legislative mandate is to administer the Act to give effect to the principles of the Treaty of Waitangi. For DOC, this means ensuring that Tangata whenua: Iwi, hapū and whānau as an active and equal Treaty partner are appropriately informed and consulted in any decision-making process.

ensuring that tangata whenua, iwi, hapū and whānau are active and equal treaty partners and appropriately informed and consulted in any decision-making process.

In terms of Tangata whenua: iwi, hapū and whānau, in particular iwi that the D-G considers appropriate for Council to consult with in this decision-making process, are:

- Ngāti Hako
- Ngāti Tara Tokanui
- Ngāti Tamaterā
- Ngāti Maru
- Ngāti Whanaunga
- Ngāti Porou
- Ngāti Puu

3. Details of any ecological assessment information to support the schedule of conditions.

DOC notes the Wharekurauponga Forest is within the Conservation (Indigenous Forest) zone and Significant Natural Area identified as T13P152 within the Hauraki District Plan and is ranked as nationally significant (Waikato Regional Council, 2010).

District Plan Rule 2.1.5.1(2) states: "... where the zoning is the same on both sides of the road, the road has that zoning also."

The D-G seeks clarification of where Council is giving appropriate consideration of the values applicable to the road reserve in accordance with the District Plan provisions, in this decision-making process.

Further, the draft licence proposes conditions on ecological matters, though no ecological advice has been provided to DOC to inform the conditions. Because of this, and to meet Council's tight timeframe for response, DOC has carried out a preliminary ecological review (a full ecological assessment is strongly recommended) identifying priority conservation values known to be present within the area of the application site, as follows:

Avifauna

2

North Island fantail, grey warbler, North Island pied tit, bellbird, kereru, ruru, shining cuckoo, kotare, silvereye, tomtit and tui.

Herpetofauna

- Archey's frog (*Leiopelma archeyi*) (Threatened – Nationally Vulnerable)

Archey's frog are only found in the Coromandel and at one site in the Whareorino Forest, west of Te Kuiti. Wildland Consultants Limited has previously undertaken numerous frog surveys in the Wharekurauponga catchment and have found Archey's frog in approximately half of the locations surveyed.

- Hochstetter's frog (*Leiopelma hochstetteri*) (At Risk – Declining)

Burns (2016)¹ notes that it is possible that common gecko and copper skink, and the following Threatened or At Risk lizards, are located within or near the application areas:

- Coromandel striped gecko (*Toropuku "Coromandel"*) (Threatened – Nationally Endangered)
- Striped skink (*Oligosoma striatum*) (At Risk – Declining)
- Pacific gecko (*Dactylocnemis pacificus*) (At Risk – Relict)
- Auckland green gecko (*Naultinus elegans*) (At Risk – Declining)
- Ornate skink (*Oligosoma ornatum*) (At Risk – Declining)
- Forest gecko (*Mokopirirakau granulatus*) (At Risk – Declining)

9:32 AM Thu 3 Nov hauraki-dc.govt.nz 25%

57 of 81

- Ornate skink (*Oligosoma ornatum*) (At Risk – Declining)
- Forest gecko (*Mokopirirakau granulatus*) (At Risk – Declining)
- Moko skink (*Oligosoma moco*) (At Risk – Relict)

Terrestrial Invertebrates

It is possible that Paua slugs (*Schizoglossa worthyae*) (Threatened – Nationally Vulnerable) are located within or near the application areas.

Bats

It is possible that Long-tailed bats (*Chalinolobus tuberculatus*) (Threatened – Nationally Vulnerable) are located within or near the application areas.

Regarding the proposed conditions, including frog exclusion fencing, these appear to be replicated from OGL's access arrangement with DOC over public conservation land. Such conditions are activity and location specific, and have gone through a proper assessment process of the extent of works, number of fences and developing options on frog management. The conditions fall within DOC's legislative mandate under the Conservation Act and other key statutes. They may not be appropriate for Council to utilise lawfully or enforce.

Lastly, the D-G thanks Council for the opportunity to highlight DOC's concerns and looks forward to continuing to work collaboratively along with OGL to ensure appropriately considered, robust and transparent decision-making processes are undertaken.

¹ Appendix 1: Oceana Gold (New Zealand) – drilling effects on wildlife in Coromandel (Rhys Burns 2016)

9:32 AM Thu 3 Nov hauraki-dc.govt.nz 24%

58 of 81

¹ Appendix 1: Oceana Gold (New Zealand) – drilling effects on wildlife in Coromandel (Rhys Burns 2016)


Whaarangi 29 | 37 M 2984758

Council Agenda - 15-09-21 Page 60

Page 30

Please contact Thomas Christie in the first instance if you wish to discuss any of the matters raised (027 341 9514 or tchristie@doc.govt.nz).

Yours sincerely



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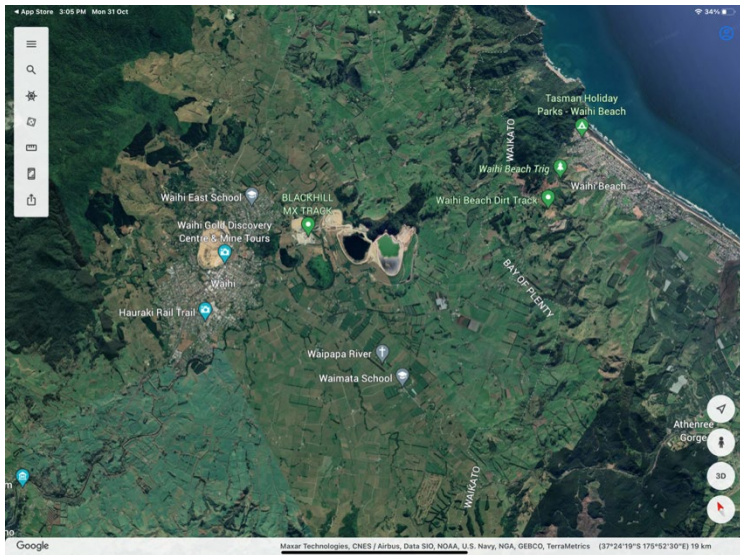
The purpose of conservation land is to protect our native plants, wildlife and natural landscapes; and to preserve areas of historic and cultural significance. Yet our current laws still allow mining companies access to these places with their diggers and excavators. We have a biodiversity crisis in Aotearoa and internationally, and we need to put nature first. The protection of conservation land is also the protection of local economies and jobs, which rely on visitors and outdoor activities to sustain them.

We presently live in WAIHI where mining has scarred this land and imposed blasting, dust etc on its people. Part of this is evidenced by the enormous hole in the centre of our town. One of the walls is in a hazardous condition. In fact I believe the company will no longer touch it for fear of its collapse. Here is a recent picture of this. This has all taken place on crown land.

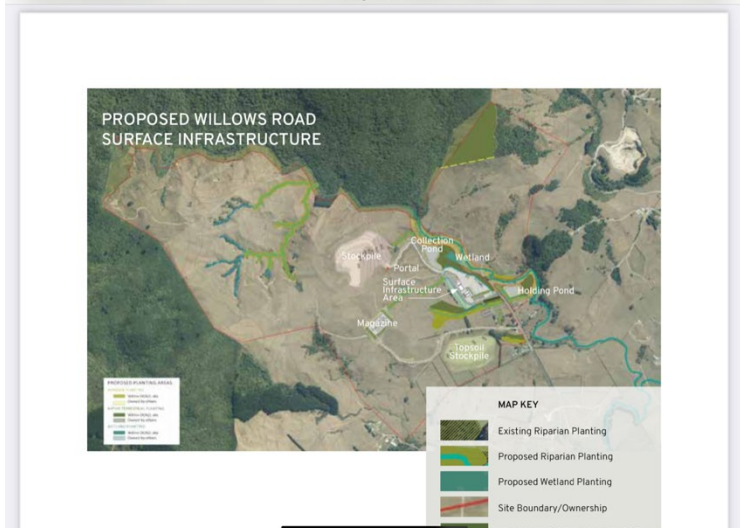


To obtain a true perspective to the height of this pit one needs to be down within and look up.. It actually 'blew me away' several years ago. I could easily envisage the town slipping into it. As it is, WAIHI is 104m above sea level. The open mine pit is on a hill. A google search states it to be between 100 to 300m deep. There is no way this open pit will be filled with water at completion of mining. As the company touted for years, depicted via a paper mache' scene of a beautiful lake, with rowers and surrounded by pines. They no longer show this. It will remain an open sore with its chiselled out circumference emitting pollutants. To remain an ever reminder that the Town could vanish one day down into its abyss.

The Picture below reveals the extent of the scar on the land currently. There is \$10M approx within a Martha Trust for restoration etc. in the future once the gold company leaves. A trifle to what will be required for monitoring etc. If the tailings dams (full of arsenic waste) breach, there will be a major environmental catastrophe. The new project will add another open pit plus another dam! Not to overlook the unknown future of unstable underground tunnelling..



We live just at the back of the proposed Gladstone open pit!





Thirty years of mining and Waihi remains one of the poorest towns in the Waikato. Kiwis can see that this industry, while it makes shareholders rich, does little for the community they operate in. Ask the company how many staff came from overseas?

The community has to live with dust, noise, vibration and blasting now - and this proposal would significantly compound that. And then the company would leave more toxic waste behind for the community to manage in perpetuity. Not a good deal for Waihi, not a good deal for Aotearoa.

Oceana Gold Co state the following within their application:-

“PROPERTY DAMAGE

Consent conditions for vibration will be set well below the level where property damage could occur. We know from the community, that there can be concern around what we would do if mine-related activity caused property damage. In recognition of this, we have a procedure in place to assist owners if they believe their property may have been damaged. If it is determined that property damage is attributable to our activities, OceanaGold Waihi will remedy the damage at our cost.”

Who, particularly at our ages 85 and 70 years, want or could handle all of this now. People are sucked into a false sense of security. If discussed on local internet sites you receive the usual rhetoric – Oh the high school gets \$50,000 a year plus other community groups. Who are they and how much? How far has this town progressed

since mining commenced? I have worked for 40 years in Waihi, the local Council and College. Handling Mgr Community Facilities at the Council. It was the Council who paid for any amenity improvements. I actually handled the parks and toilets upgrades just after amalgamation in 1989. Yes, the Gold Co had to be seen to be doing something and contributed to the new Sports Stadium and new street scape. I have seen very little significant improvement that could have warranted such devastation to the town and country! Our end of town is shabby! The Gold Co entrance into the pit is Shabby! Bribery!

We purchased our property 6 years ago in Waihi. Shifting from 45yrs at Bowentown. We understood at the time once the company had completed its work in this area (tunnelling underground) that would be the end of the blasting etc. Around 2 years.

This new North Application has come as a major shock to us all. The Council doing no consultation. Treating this matter as a fete'- compli. In this time we experienced blasting like earthquakes. Wall hangings would sway at times. It was awful. Would regularly complain to the company about the blasting severity. Machine readings online we believed were incorrect. Received over this time a pittance of around \$1500 for inconvenience. (\$500 of which was an initial payment). We paid just over market value for our property and the Gold Co paid additional to the seller at the time.

We didn't ask for the inconvenience or upset. A so-called Consultative Committee (made up in the main by company staff and business interests) is meaningless to those affected. They do not discuss complaints lodged against the mining etc. Neighbours have no idea what is about to take place, that is, if the government permits it to proceed! I say to you - How can a government and local government permit such an activity to be afflicted on its residents!? Let alone on Crown DOC land! This snap was taken in May 2022 by a pilot we know:-



Please prevent this new Waihi North Oceana Gold Co Mining Licence from Proceeding.
Please prevent any mining on DOC land in the future.

Many thanks for your time and we look forward to your reply.

Yours faithfully

Gloria J Sharp (Ret. JP)

David N Sharp

JT - Shane Jones wants to mine more of NZ his freight strategy

Transcript of conversation Gloria Sharp had with Eric Torvelainen TAILINGS STOREAGE FACILITY
ENGINEER for Oceana Gold Co. On 23rd October 2024

And on the structure and I,

SJ - I sort of feel that if we have, if we have the resources and we've got a cap on dairy and we're struggling to plant many anymore forests because of concerns about productive land. And we have a problem with water storage for further horticulture. I want to open up minerals here, but at least I just want to consider those numbers again.

JT - So let's take those numbers, the most generous point, right? So let's take this GST, 15% on a billion, but this is a billion in exports, not a billion in profits, but let's call it a billion on 15% on profits, right? That's 150 million and those royalties that's 180 million. And then PAYE as well of what? Mm-hmm, 28%, 30% it would seem to be really generous (= \$430M) So, so you're still looking at under half a billion dollars in profit from New Zealand government. You wanna double that, it's gonna bring in only a billion dollars a year. Mm-hmm. Less than one 4 hundredth of New Zealand's GDP and that's your vehicle for transformation.

SJ - But check that type of injection, that type of revenue in the West Coast is transformational.

JT - Is all the GST going to the West Coast? Of

SJ - No, but the reality? Actually, I'm looking at, I'm looking at handing back some of the royalties to the West Coast.

JT - OK, explain that to us. The royalties, not the GST, Yeah.

SJ - No, no, not the GST. It's not it's not the government's policy to redistribute GST like the Aussies. But if we we're undertaking a review of the royalties with a view to distributing them back to the area. But I'd say to you. The minerals are largely in the West Coast, not exclusively and that is a substantial injection back into a benign part of New Zealand.

JT - It would be if you're putting a billion dollars in, but but at the moment royalties make up about 2% of those total exports, so 2%. So at the moment even if we double our royalties at \$60 million, Yeah. And if all of that's going to the West Coast, that's what you're saying. But it's not only that. It's the PAYE, which isn't going to the West Coast.

SJ - No, no, no. It's certainly money that's generated. Yeah. And when those jobs flow, hopefully they're all paying taxes. Those are more people, more energy, more households and more communities. Remaining intact. Now, I don't think you can purely judge the success of what I'm saying by looking just at the West Coast, although my focus is there 'cause that's where a lot of the these, the Santana mine, the gold mine, which may or may not go ahead, and Central Otago. There's that, there's the expansion plans in Coromandel and what what alternatives are there in these areas?

JT - No, no, but I mean the tourism for example,

SJ - OK. So the tourism of the West Coast has not actually led them to be one of the highest ranking per capita GDP people, this is all about bringing some diversity and bringing actually an opportunity for New Zealanders to stay there. Now I know it sounds strike me complaining about everyone going to Aussie, et cetera, but that is that is the case.

JT - No, but I mean, The thing is that you're making this an economic argument about about opening up mining in New Zealand so in detail about mining profits and taxes is not made public in New Zealand, but during the last National government, economist Jeff Bertram produced a pretty thorough analysis of the economics of mineral extraction in New

Zealand. Have you read that by any chance?

SJ - Elaborate which part? I may very well have read it.

JT - His analysis at the time said this. The very high depreciation share in gold and silver mining implies low company income tax. It's the corporate tax you were talking about. And income tax and royalties combined were only 4.4% of total output. So again, your vehicle for economic transformation isn't going to bring in much money.

SJ - This is where you and I disagree. I've been down and I've seen those gold mines. In fact, when I was the Provincial Growth Fund minister, I put \$15 million into a gold mine. That was when Eugenie Sage wasn't looking. They've since paid that money back. They are expanding those number of those numbers of jobs by hundreds and hundreds of people. And I don't think we were going for rare earth minerals, not gold. But you can't have rare earth minerals in some cases because it's located where gold is such as antimony, a mineral which is highly sought after by the Americans, right. So, So again, do you see to us this week, even though those figures were taken in 2011, he said that he feels those figures about 4.4% of total output would be broadly right. So if we have a billion dollars in exports. You double it, \$2 billion in exports, just 4.4% of total output.

JT - Would you consider adjusting the royalty rate for gold, for example?

SJ - Yeah, Well, I've looked, I've asked the officials to have a look at the royalty rates. But at the same time, I'm not gonna shy away from the fact that I see both are moral and economic and a social case for substantially increasing the footprint of mining in New Zealand.

I think that the current footprint is actually catastrophized and then there's a trade off if you want more economic activity. Should we load too many costs upfront or should we allow for a depreciation? Schedule that enables people to upgrade their capital assets. And in terms of the royalty, I've asked the officials to have a look at it with a view to redistributing some of that royalty back into the region, right.

JT - So, so are you also asking those officials to consider the royalty rate?

SJ - Two things, how would we transfer the royalties and the appropriateness as the industry expands, right. And have a comparison with overseas jurisdictions. At this stage that's not cabinet policy, but I want to make sure that the rate is set that it that it accelerates activity, but then that the public feel that they're getting a reasonable return from the from the actual resource.

JT - OK, let's talk about the return for the public. So if gold and coal make up almost all of New Zealand's mineral exports at the moment, who owns our biggest coal and gold mines? So those New Zealand companies are overseas.

SJ - There's a mixture, obviously the craze, not the gorilla, but the big end of town. Bathurst is a major player in relation, so McRae's is, let's just go through them. So McRae is the biggest gold mine at the moment, and it's owned by Oceana Gold, which is overseas. Mm-hmm. Uh, why he is the second biggest? Mm-hmm. It's owned by Oceanic, Oceanic gold overseas, uh, coal, Stockton Coal owned by Bathurst, listed on the ACC majority owned Singapore, partly, partly owned by New Zealanders. Why Castles, UH-2 coal mines. Bathurst as well. Doctor Waddell, Right.

JT - So, so you would accept that at the moment, our biggest Operations are largely owned by overseas operators?

SJ - correct, right.

JT - Why is, why is it gonna be any different once we expand that? Why, why should we expect profits to stay in New Zealand?

SJ - Well, I could melt the same argument, but I won't about the Aussie owned banks. The reality is we're an open, trading, liberal economy. These companies are entitled to come here, develop our resources, employ our people and if they make a profit, pocket it. Now will certain New Zealanders step up to the plate? Possibly. Santana are good for their word and put it on the New Zealand Stock Exchange. You could have Kiwis owning that company via the Stock Exchange, but we haven't generated uh, the surplus and we haven't generated enough enthusiasm as Kiwi investors to capitalize these umm, these sectors. I mean, I mean you literally.

JT - You're going to Australia after the centre view to to talk to central investors. Yeah, yeah, it's all going. I thought it was New Zealand first.

SJ - Yeah, Australia 1st. I'm going as a walking billboard and let's face it, we have a warm and cozy relationship. Come and take our minerals and then take your profits back to Australia. Send our send our nieces and nephews back and come and

work in New Zealand and put Some of your capital back into New Zealand and they are already here and where will those profits go well once again we're getting back to what you and I are saying in any enterprise jobs generate PAYE, jobs generate GST, jobs generate tax, there will be royalty but if the capital is not in New Zealand to expand our General estate then I'm happy to take it from Australia.

JT - So so if jobs generate PY according to your own sums, pursuing mining will only increase the number of jobs from 5000 to 7000. So we're doubling the size of exports but only adding 2000 jobs in an industry that currently employs 5000. Why aren't we doubling jobs if we're doubling exports?

SJ - Well, over the years, this has become, because of health and safety, a highly mechanized process. And and I don't wanna talk unnecessarily about the health and safety thing 'cause it's another whole topic and it has to be uppermost in our minds. So those jobs are incredibly valuable, the level of productivity associated with those jobs. Extremely high, right. But if so, they are high paying jobs. Yes, they're high paid jobs.

JT - If we're relying on the economic transformation that is provided by greater employment opportunities, there are actually only we're not doubling the size of the industry in terms of those jobs. So the PIY that would be brought in is not the same as yeah, over 5000, I think.

SJ - So Jack, you're being unreasonable and you know the place to do The show is in Reefton, Westport, Greymouth and that benighted part of New Zealand. MMM. Such an infusion is going to be transformational. Yeah. Not only are we going to have to then invest in coastal, uh, coastal shipping, in fact, I think it's Western minerals. They're bringing a huge barge down from Indonesia 'cause. Reading they substantially increasing and that part of New Zealand economic activity. I am the regional development minister. So those are those are high skilled jobs, many of them will be engineering jobs.

JT - Do you accept that many of those are going to be overseas workers effectively flying in and flying out.

SJ - So when I went to Blackball 300 people turned up for the announcement of the mining policy. Hmm. The majority of them were miners. Exclusively they were Kiwis. I'm told by the firms down there there are no shortage of young Kiwis lining up to take those jobs. The problem is at this stage we've deprecated all of the not most of the training opportunities. Downplayed mining through our universities yes, some specialized roles will be taken by foreigners, but it's a lot of Kiwis made in Africa and Indonesia and Australia and they've personally told me Jonesy, if you actually kick a goal in the. Disregard. We'll come home and help develop our own country.

JT - Thry've personally told you that?

SJ - Yeah, I know heaps of them 'cause I, sadly, many of them come from Northland and they've never come home.

JT - The thing about mineral extraction, obviously, is that you can only dig it up once.

SJ - Yeah, that's true. So you make a very good point. So even if it employs people for a period, yeah, those aren't necessarily long Term jobs in those particular regions or areas, Right. At some point, the scene runs dry. It's no longer economic for mining operators to continue their work. What happens then?

SJ - Yeah, you're sort of putting up a straw man there really, aren't you? I mean, we're living at a point in time. Well, can you think of any time that that's happened on the West Coast in the past? You know, I mean, look, I come from the cowrie gum industry. It's a boom or bust. Yeah, but at a point in time, Mother Nature's resources are there to be used. It will the. The final answer will be science, technology and geology. Jack. Yeah. In terms of the West Coast. And I don't think we should undermine. The objectives that I've set for myself by contemplating that geology might run out, it is what it is. We are at a point in time, our circumstances economically are quite dire. Regional New Zealand. This is an opportunity for us to exploit Mother Natures legacy and I'm all for it to exploit Mother Nature totally.

JT - Yeah, the the question is whether or not exploiting Mother Nature is ultimately going to be worth what could be a potentially limited economic benefit. I mean, I mean, if we're only going to be getting 4.4% of total output, we're only going to be adding 2000 jobs overall. We don't necessarily have the skills to fill all of those jobs at the moment because we aren't training enough people through our universities. It's really hard to see how this might be a vehicle for New Zealand. \

SJ,- Sorry, repeat again. These firms are already largely employing Kiwis. MMM many Kiwis overseas. I've no doubt in my mind with the right opportunity would come back to reinvigorate this particular segment. Hmm. And when an industry goes through a process. Of the bell shaped curve the resources associated with that industry end up feeding other types of industries but you are right that any economy has to be constantly evolving but we're at a point where the world has a thirst and hunger

for resources that we have, either we Compete internationally to get them to come here or we create our own industry. At this point in time to boost our resilience and I'm all for that.

JT - To what extent have our Paris climate commitments factored and plans around mining?

SJ - Oh, I think that the party that I belong to, we don't want to do anything that's demonstrably offensive against these international targets but we need To make sure that the solvency of our own country ranks as high as any sort of targets that earlier governments may have committed us to. And look,

JT - So that doesn't answer the question though, sorry. To what extent have those Paris commitments factored in you?

SJ - The highest art is beautiful.Breathtaking.Timeless and moving. Well, whoever does the investments and when they end up having to pay an ETS levy, that's their role, right? Just just the ETS as in, as in for their operations rather than the coal that they might be taking up, for example. OK. Can I answer that in a slightly protracted way?

JT - It's not like you,

SJ - yeah, So if we're not going to do these types of industries here and you may get cross with me saying this, they're going to happen elsewhere. So I say to you that our environmental standards, our Labor Standards and related thresholds in New Zealand are better than anywhere in the in the world. So I believe that by having this industry here, we have a functioning ETS, then we will make, they will make the necessary contributions as required under our climate change legislation for industry here. But what I'm more fearful about is if we don't do it here, End up the industrial de industrializing ourselves and I think that's more of a threat to the long term future of New Zealand than endless debates about these, uh, international targets.

JT - Let's talk about the conservation side of things. You want to increase operations on conservation stewardship land. What are the potential conservation downsides?

SJ - Well, it's not going to be carried on Schedule 4 lands, and I think where Jerry Brownlee And that generation of politicians tried to kick a goal in the key government.

All hell broke out when they gave the impression that national parks were open. Yeah, the Prime Minister, and I've also said it, who have said no.

JT - So my question was, what are the downsides though? What are the potential conservation downsides?

SJ - Well, we need people to mitigate and clean up after they've done their mining, but we shouldn't hold the current mining industry to standards that existed in the 1950s and 60s. It's a whole Intelligent industry this is

JT - it still didn't quite answer their question what, what are the potential downturns from the conservation perspective?

SJ,- The the potential downsides are when a miner does not restore, mitigate or ensure that the area of land, which is only 1500 hectares by the way on the dock estate, is not restored New Zealand.

JT - Industry is 37 times more valuable than mining at the moment, International tourism exports at 10 times, uh, mineral exports. The clean and green image is absolutely vital for New Zealand, right? You would agree with that. So So what impact will doubling our mining operations have on that reputation?

SJ - Not the size of a mining operation on the 8 million hectares of dock estate is akin to the size of a beauty spot. It's irrelevant.

JT - So. So what about having a minister in charge who's making jokes about killing Freddie the Blind Frog? What sort of impact do you think it has having a a New Zealand cabinet minister joking about killing?Animals.

SJ - I think the fact that what I'm really doing is deploying rhetorical devices and taking on the catastrophizing doomsday approach. And since Helen Clark's government society is, in my view, being enveloped in a doomsday view about mining. I don't accept it. And the reality is, if we can create jobs of mining enterprise that restores its nature and we move a few animals and critters around and the net effect is that the size of the population still increases. Yes, some will go by the way, but long as the net effect That we've grown the overarching population.

JT - we can do that anyway and So what if something goes wrong that's a best case scenario mm-hmm. Mining is an industry fraught with risk So what if something goes wrong and we have a biodiversity

SJ - But all industries have risk and it's up to the regulators and it's up to the operators who themselves will face financial penalties if they don't comply.

JT - I mean, mate, I I wanna tell you, but what would be the impact to it, to our image? Like if we if there was, if there was some some sort of ecological catastrophe as a result of a mining operation gone wrong. Mm-hmm. What would be the impact

on our image?

SJ - Yeah. But you see, once again, check you, you can't catastrophize things. There is no major in some sort of shubinal disaster here in New Zealand. These are tiny operations. They are a fraction the beauty. The remediation was pretty boring.

JT - The Tui mine remediation was pretty bad.

SJ - OK, So was it a catastrophe? No. What that represented was the crown said he after some vagabonds having to spend 300 odd \$1,000,000.

JT - No, that's the toy oil field. The toy mine cost \$21 million. The Tui oil field, not to be cost almost half a billion. Yeah, but what's your name? I would definitely call that a catastrophe.

SJ - OK, what you're not focusing on is that the current mining industry should not be held to account because one or three egregious failures, same as the oil and gas industry student shouldn't. And I think what's penetrated is this doomsday thinking that the industry don't value their social license. And to think they do, yes, you're the dairy industry. It's a top concern. It's a top concern for the mining industry, clearly.

JT - And, and I'm interested in in this because I'm, I'm really interested in your approach when it comes to social license. You criticized the Labor government for the oil and gas ban in the way in which that might have spooked international investors in the extraction space. What is the risk that US minister are guilty? Of lurching to extremes in the opposite direction.

SJ - Yes, I have heard that criticism and what I feel that I'm doing through my advocacy. So I'm bringing the pendulum back to where it belongs. I'm trying to rescue the pendulum from the thinking and being enveloped in a day analysis. So like an equal and opposite force approach. The reality is the doomsday green ankle biters have had it all their own way for the last 25 years. We have ended up delegitimizing, demonizing a sector that under my advocacy is going to be restored. But let's just imagine for a moment that I'm an international. Still watching this on YouTube, right? And, and, and you know, these big companies deal in risk. Yeah, one minute I've got a government banning oil and gas operations, uh, more exploration, trying to ban all mines on conservation land. Six months later and I've got a minister publicly saying dig baby, dig. The messaging from government has lurked from 1 extreme to another.

JT - What's to say won't happen again?

SJ - Well, I have to concede, a number of international people have spoken to do regard New Zealand as a more riskier place to invest in, but that risk is not just associated with mining and I think that's a more dire threat. Then some of my hyperbole that people dismiss.

JT - Do you accept that your hyperbole might have contributed to that?

SJ - No, I think what I'm doing is actually restoring some balance because the doomsday sort of ankle biters have had their way for far too long and I genuinely believe the majority of the people in the Labour Party are starting to see things my way, that this, and they of all bloody people should be seeing it. That's their origins, that. Over the actual list that the capsule committee is considering that's been run

JT - Oh, yeah, yeah, yeah. How do you think it's in our constitutional interests or our democratic interest to have politicians potentially overhauling judicial decisions?

SJ - Yes. So please repeat what I'm gonna say under David, David Parker's fast track legislation, people who have previously being denied Can be considered and I think that there's a lot of selective morality people were tolerating David Parker's fast track we can we can ask him about that as well.

JT - So my question to you is how is that in our constitutional interests whether it's David Parker's or this aspect

SJ - This legislation from my perspective, this is a process where the off the bill as pro development i tried that crazy facial hair remover going viral on facebook and i'm And if a person who has umm, suffered a set back and, uh, another set of, uh, statutory processes has a go under this bill, that person is constitutionally entitled to do so.

JT - I wanna ask about fisheries.

SJ - I thought you would.

JT - Would you agree that it's inappropriate for someone who has, along with their party, received 10s of thousands of dollars in political donations over their political career from people or companies associated to a particular industry, should then be made the minister in charge of regulating that industry? Yeah, yeah, yeah, you would agree?

SJ - No, I think that New Zealand public should be incredibly reassured that at long last there's a New Zealand politician

who's an expert in fisheries is actually the Minister.

JT - Over your years in politics you've received thousands in donations from fishing companies. How do I know that you are acting in the interest of all New Zealanders as those to those companies,

SJ - Well, I think by focusing on the growth productivity of the industry, I'm always acting in the interests of all Kiwis. The majority though of the regulatory decisions, they happen well down the food chain from my office, most of them are undertaken by the permanent state, otherwise known as the civil service and all of the scientific analysis that doesn't take place because I have a preference for a certain outcome. The quota decisions, whilst they might be agreed to or disagreed to by the minister, I think Kiwi should have confidence for the last 30 years in that process. Has been the standard model, the Kermadec Ocean Sanctuary. Oh, good. I'm glad that's gone.

JT - Yeah. Was that in the interest of all New Zealanders or pushed primarily? Primarily in interest. It was pushed by foreigners, was pushed by the Pew Foundation.

SJ - We're not. We're not here to suit the suit, the interests of former Prime Minister John Key. Well, it goes well back before, and I don't want to talk about the decision that John Key made at the UN and all that sort of stuff, 'cause that's now historical detritus. This copper, this issue was brought to New Zealand by foreigners, the Pew Foundation out of America. Does that make it a bad thing?

SJ - For me it does. Why? We don't need well heeled Northeastern American groups coming down practice the morality that they're seeking to oppose us in their own country.

JT - Maybe we do need to protect our marine biodiversity though. I think we do. And there's already a marine reserve up there. And it was created with the acquiescence of the fishing industry in the 1990s. So one of your biggest campaign donors this election explicitly and publicly opposes cameras on fishing boats. One of your first moves as Minister was to announce a review of cameras on boats, Why? Why was that?

SJ - Well, sadly the industry have now changed their tune and they feel that actually, in order for their social license to be expanded, cameras on boats is an important feature.

JT - Why is that? Sadly?

SJ - Well, I, I, prior to taking on this role, I was always of the view that it was an imposition in terms of cost. There was some vagueness as to what was the value for fisheries management outcomes. And more importantly, how do you protect the privacy of the information which they're entitled to under the Human Rights Act? So, so, so when you, when you consider the information that we've gleaned.

JT - Yeah, regarding fisheries. What have we learned, uh, from cameras on fishing boats? So I note that MPI has just published its first data on fishing bycatch since those cameras were introduced. What? What have we learned?

SJ - Oh, well, obviously it's providing a lot more or how accurate information, although the modeling on dolphins and seals and other critters was by and large accurate. But look, cameras are here to stay.

JT - Yeah, No, my question was, what have we learned?

SJ - Uh, well, but I'm imagining that what we're seeing is up to date images as to what is the effect of various fishing practices on the local ecosystem.

JT - What's happened is since they introduced cameras on boats, all of a sudden all of the reported bycatch has massively increased, which is very strange. So there's been a sevenfold increase in reported dolphin catches, a 3.5 fold increase in albatross interactions, a 46% increase in reported fish discards. Why do you think that's happened?

SJ - Yeah, but it's the wildlife industry. You're always going to encounter a few stray dolphins and a few birds, and cameras is going to ensure that fishing practices minimize those types of outcomes.

SJ - But you, you, You saying that you didn't think that we'd learn anything. Oh, you have well I, I, I until such time we work out who's gonna pay for it. How's it enhancing management outcomes and which obviously I mean it's enhancing it and now we there's lead to a 46% increase in reported fish discards and a 700% increase in reported dolphin catches.

SJ - when you're talking about fish discards, we're actually dealing with that problem through, uh, discard policy and we're gonna change the regulation things. These were being reported before.

JT - We didn't know this, We didn't have this data before. Cameras on boats all of a sudden then that all of a sudden fisheries were being a little more honest than previous to the future.

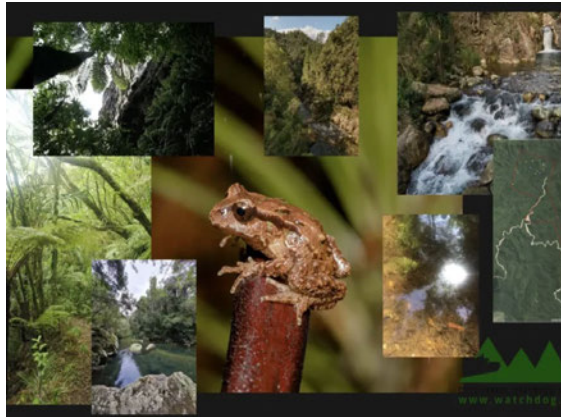
SJ - We can't settle ourselves with apocryphal tales from the past.

JT - That's not for the few, that's not. When New Zealand's future lies, do you support the Hauraki Gulf Teacupa Moana Marine Protection Bill?

SJ - Oh yes, that bill has come back. There'll be a few refinements. There's two areas where we need to be absolutely sure we can carry the public, the interaction with the. Umm, seabed and foreshore claims, which is a minor, relatively minor issue. And can we carry the public with us that in these protected areas, limited tongue at the funeral, food gathering rights still subsist. There's two schools of thought irrespective of your ethnicity. Arahui is Rahui and it's probably where I am from. However, I realized that under the fishery settlement there were some guarantees made about food gathering rights, but other than that, I think there's quite a lot of. Umm, support in general for that bill.

What's wrong with mining at Wharekirauponga – a few thoughts.

- by [Watchdog Coordinator](#)
- June 30, 2025



Coromandel Watchdog of Hauraki is a small community organisation that has been working for more than 45 years to keep gold mining out of Hauraki.

Our group started in response to a renewed interest in gold mining in the late 1970's early 1980's when the price of gold began to reach significant levels. Several companies came into New Zealand (primarily from Australia) with a view to mining, and due to its history, the Hauraki area, and Te Tara o te Ika a Māui the Coromandel was specifically targeted.

Our communities had real concerns about the impacts of mining on freshwater, on ecology and on our local society – concerns that persist today. Mining, particularly hard rock gold mining, is a massively damaging industry, and has well documented impacts on freshwater and on the ecology of the wider environment. There are also a range of social impacts that stem from a boom and bust' industry, as well as the division that comes with both a lack of knowledge and ideological differences.

Today, in 2025, we can see that our fears were not unfounded. Waihi, the only area that was successfully developed for mining in the 1980s has not seen great wealth from that activity. In fact, they are now one of the poorest areas in the Waikato (on a grander scale, the West Coast of the South Island, an area mined continuously for more than 100 years is similarly poor, despite a significant amount of mineral wealth

being removed). Waihi has lost a significant (sacred to some) landmark Pukewa, and now in its place stands a vast hole – so vast that high school geography classes visit to see a man made topographical change. The River is now topped up regularly with ‘treated’ water – within a specified Ph range, but anecdotal evidence indicates that this has had a major effect on the River.

Having been working in this space for so many years, we have been aware of and following Oceana Gold (OGL) developing interest in the Southern Coromandel with concern; the expansion of the mining at Waihi itself is, as the gold has again reached record prices, inevitable. It has largely become a mining town, dependent on the mine for employment for some. We have and will continue to oppose the expansion there, in part due to the toxic legacy that it will leave future generations by way of the vast dams of toxic waste it is constructing, the climate considerations and the (new) proposals that would see the loss of SNA’s, wetlands and yet more landforms. But we are also deeply shocked and saddened to see a new industrial underground mine proposed for conservation land, as part of that expansion.

The proposal is to mine in nationally significant conservation land at Wharekirauponga via a 6.8km long, 6m high dual carriage way tunnel system. Initially OGL applied for a resource consent for this in 2022, but then in 2025 – before the company had finished providing Councils (WRC and HDC) with the further information they had requested – the company withdrew that application as they were accepted into the Government’s new Fast-track Approvals Act process.

This process denies any right of participation to all but a very limited group as prescribed in the Act – various Government Departments, specific iwi, hapu (identified via Treaty Settlement Processes), Councils and the Applicant themselves. There is no right of participation afforded to community, to groups (that represent the public interest), to experts in the field or to non-mandated tangata whenua. These may be invited to comment by the expert panel, but there is no clarity around if that will happen, until the invitations are issued. And then, the comments must be provided within 20 working days.

Departure from the participatory process will not provide avenues for the robust scrutiny and interrogation of the application that such a project must have in order to reach a robust decision and ensure that the various expertise that such a process facilitates is heard – whether it be matauranga or cultural connection, expert or local

knowledge or representations of what a receiving community want – how such a project could impact them.

Tunnelling into an area with a high water table must only be done while exercising the precautionary principle, particularly given the scale, possible ramifications (acid mine drainage, dewatering etc) and risks in these times of uncertain climate. This proposal has a range of unknowns – the reports on water repeatedly state assumptions and predictions, and ifs... it identifies that there is a warm/hot spring in the area – an anomaly – that will be dried up as a result. But there is little consideration for the ecological implications of that. There is succession of drying up wetlands, and expectations that intrusion won't happen between the stratifications – but these are unknown quantities. There is, by nature of what is being proposed, a significant gap in knowledge of the geophysical impacts that may come from the changes to the hydrology of the underground systems. There are a range of assumptions made about the impacts on above ground vegetation. And then there is the consideration of taking thousands of litres of water out of one catchment, and putting it into another, every day. From the Wharekurauponga, which leads into the Ōtahu, and eventually Whangamatā harbour, into the Ōhinemuri, which in turn enter the Waihou before heading out into Tikapa Moana o Hauraki.

One of the most obvious ecological concerns we have is that it is an area known to be a core habitat area for the **Kūripeke** (Archey's Frog), one of the 3 unique and evolutionarily distinct herpetofauna species of Aotearoa New Zealand. These species are only found in 3 areas of the country, and this is one of the most significant – this exact spot. The reports in the application on this subject are woefully inadequate. Based on a range of inappropriate extrapolation, and supposition, not even written by a herpetologist, let alone one expert in the species. And the Kūripeke is not the only threatened species in the area; the application notes a variety of freshwater species, a number of flora species and yet more that 'could' be present but as yet have not been identified. Given that Aotearoa New Zealand has more than 4000 species in decline, and we are still discovering species as yet not described in science yet, we must ensure that we carefully consider placing them under any more stress – especially where we do not need to.

There are two areas of precedent that we are seriously concerned about in this proposal; 1 – the mining permit and consents in and of themselves. This area is a significant natural area within Hauraki, it is nationally significant conservation land

and core habitat. Allowing mining in such an area is inappropriate and unsustainable. 2 – the offset proposed by the company. Offsetting is inherently unsustainable, particularly in cases where it is designed as a mechanism to enable a private company to have significant impacts on public land with high biodiversity values in return for funding *some* biodiversity work elsewhere on public land. The maintenance of public land, the conservation of it, should and must be adequately funded by the Government – not by private businesses as an ‘offset’. To us, this – and the whole ‘no net loss’ narrative, is illogical. The former certainly seems like a bribe: if you let us do this, we’ll do that....that is a slippery slope indeed.

The offset itself is not very significant, poorly thought out and has had little input or consultation to inform it – and, like the economic benefits of the mine, is for a comparatively short time. Not that we think that any economic gain would justify sacrificing such significant ecological values as are found in this area, but frankly, a company that is taking in the vicinity of \$350,000,000, offering up \$8,000,000 (over 18,000 hectares, over 10 years for pest plant and predator control) is pitiful – and makes a mockery of the ‘care and concern’ they claim to be doing it for.

We are concerned about the actual character of the company. OGL has a shocking international reputation for harming the environments, and people, in the jurisdictions it operates. In the uSA where it has the Haile mine, it has been repeatedly fined for breaching environmental limits. In the Philippines, there are clearly recorded instances of both environmental and human rights abuse. In El Salvador, it had its licences revoked as it became apparent that the freshwater sources of communities were being compromised (a situation which saw the company take that Government to the ISDS Courts, suing them for hundreds of millions of dollars before eventually losing and having to pay the El Salvadoran Government \$7million.

There is a lot missing from the application – we are still finding the gaps – although being just a lay people we are no experts in the range of topics that this application traverses; a few examples are found in the Water reports, of which there are many, there seems to be an assumptive theme, a lack of precaution, a willingness to give it a go and see.

- The Frog report has some serious deficiencies such as it relies on a survey method that was not designed for the purpose it is being used for, so results should

not (cannot reliably) be used for that purpose. The report says that “conclusions drawn from limited surveying are tentative...” Therefore the final statement of inferring minimal impact of vibration footprint on frog distribution is not robust.

- In the tailings reports there is an assertion that Oceana ‘supports’ international standards, but at no point does it indicate that they are seeking any accreditation to them.
- The financial information in the Social Impact reports extrapolates a lot of short term benefit for the local community, and region (and nationally) but makes no comment on the longer term impacts of end of mine plans (OGL were due to wind up this year, but had no plans in place, had done no work with local community or Councils to that end). It contains no consideration for the ongoing maintenance and monitoring of the Tailings dams – or of liability for the Company should (when) a dam fails once they leave Aotearoa – they may be here for 10-20 more years, but these dams will persist for hundreds or thousands – unless they collapse first, and the experts (geophysicists who work in the mining/hydrology etc spaces) that we have spoken to have opined that that really is a when, not an if.

And that’s just a few thoughts about this application that we thought we’d share... as the process plays out there are more and more factors that highlight that Fast-tracking a proposal like this is not going to lead to a good outcome, for people of planet, for Aotearoa’s unique and special species nor our communities – and certainly not for future generations of either!



Newcrest Mining/AAP

Huge Cadia gold mine ordered to reduce polluting dust. Is it safe to live near a mine like this?

Published: June 22, 2023 3.40pm NZST

Ian A. Wright

Associate Professor in Environmental Science, Western Sydney University

For the past 15 months, I have been helping residents living near the massive Cadia gold and copper mine in NSW to verify their concerns about pollution from the mine. The findings of alarming levels of heavy metals in their water tanks, as well as in blood and hair samples, prompted the NSW Environmental Protection Agency to investigate. Yesterday it ordered the mine to stop releasing an “unacceptable level” of dust that carries these metals through the air.

The EPA is advising that the water from tanks in the area is safe to drink. This advice is based on the results of NSW Health tests of residents’ kitchen tap water in March 2023. The EPA is also helping to organise water testing for locals, many of whom rely on rainwater tanks for their drinking water.

I remain unconvinced the water is always safe to drink. Metals accumulate in the bottom layers of tanks, so when water levels fall, people could be drinking water with a higher metal content.

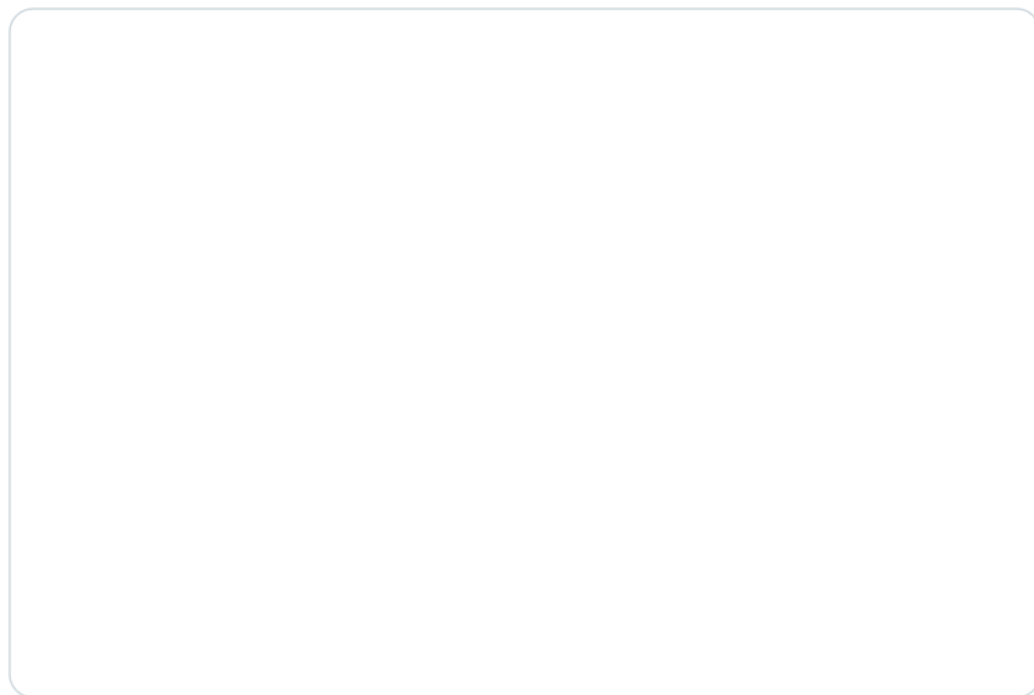
These developments also do little to reassure residents who have similar concerns about other recently approved metal mines in NSW.

NSW EPA

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We're taking immediate action on @newcrestminingltd as Cadia mine continues to fall short of its legal obligations to meet clean air standards. New conditions have been included in the licence variation to address community and environmental concerns. rb.gy/qlac0



7:59 PM · Jun 21, 2023



4



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What forced the EPA to act?

I first heard of complaints of dust blowing from the mine, particularly from its tailings disposal area, in 2021. Locals expressed concerns about the impacts on their health of inhaling the dust.

Over the past year, many people in the area have sent me water samples from their home water tanks. These are fed by roof runoff, which they were concerned could carry metal-rich dust into the tanks.

I sent the water samples to a commercial testing laboratory. The results have been very confronting. Many samples failed to meet Australian Drinking Water Guidelines.

This prompted a community group to run their own citizen science survey of local drinking water quality. They systematically collected water samples from the bottom of household rainwater tanks on dozens of properties surrounding the mine. They sent the samples to a commercial testing laboratory.

I reviewed the results of their study, conducted in February and March this year. Coupled with a previous study, we had results for 47 water samples, and 32 (68%) exceeded the drinking water guidelines for lead (less than 10 micrograms per litre). Alarming, 13 samples (27.6%) recorded concentrations of more than ten times (100µg/L of lead) the recommended limit.



When rainwater tanks run low, residents are at higher risk of exposure to metals that build up at the bottom of their tanks. Shutterstock

Read more: [Not all of us have access to safe drinking water. This clever rainwater collector can change that](#)

Many community members also reported elevated levels of metals in blood and hair samples.

Lead is a major health issue in water supplies across the United States. It's a neurotoxin that builds up in the body and can cause lifelong brain impairment.

Yet the community was struggling to be heard – by the EPA in particular. On May 12 this year, I was invited to meet with NSW EPA CEO Tony Chappel. I brought two members of the Cadia community.

They talked about their concerns about drinking water. They also broke the news about excessive metals in local residents' blood results. That meeting changed everything.

In the following weeks the EPA has acted swiftly to stop this pollution and help the community. The agency is focusing on a major potential source of the contamination from the mine: dust.

The EPA has now ordered the mine to take all necessary steps to immediately stop releasing excessive amounts of dust, which may include reducing production.

Read more: [Children continue to be exposed to contaminated air in Port Pirie](#)

Why is dust such a critical problem?

The Cadia [gold and copper mine](#) has been operating for more than 25 years. It includes an open-cut mine and more recently an underground mine, the [largest in Australia](#). It is the underground mining that now seems central to the contamination.

The EPA issued a “prevention notice” on May 29 this year. The agency [pointed to](#) a ventilation vent (vent rise 8) that was releasing more than seven times the permitted dust content. Also known as the “crusher vent”, it has caused other serious air quality concerns, with [emissions of cancer-causing crystalline silica](#) recorded at 18 times the legal limit.

In [August 2022](#) and [July 2020](#), the EPA had fined the mine the maximum \$15,000 for dust pollution and is clearly frustrated by its [unacceptable impacts](#). It has just issued the mine with revised environmental regulations.

The EPA [press release](#) yesterday said: “Additional reports will also be required on lead dust fingerprinting research.” This “fingerprinting” [analysis](#) of lead helps trace its transport pathways and geological origins.

In a statement in response to the EPA’s latest action, the mine operator, Cadia Valley Operations, said: “We take our environmental obligations and the concerns raised by the EPA seriously and will take action to comply with the licence variation notice.”

Read more: [Mount Isa contamination 'within guidelines' but residents told to clean their homes](#)



Underground operations at the Cadia mine now appear to be the main source of polluting dust.
Newcrest Mining/AAP

What does this mean for residents near other mines?

This case might not be isolated. Gold and silver mining in NSW is booming.

Approved in March, McPhillamys gold mine near the town of Blayney is about 20 kilometres from Cadia mine. And the Bowdens silver mine near Mudgee was approved the following month, despite many submissions expressing concern about the impacts of lead dust on human health.

Sue Higginson 

@SueHigginson_ · [Follow](#)



Alarming news at public meeting last night about the Silver & Lead Mine just approved near Lue Mudgee. Community members living near Newcrest's Cadia Silver Mine near Orange have found lead in their water and heavy metals in their blood. We must help & stop this.
[#nswpol](#)

11:27 AM · Apr 28, 2023



272



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Can people be safe and healthy living near a large metal mining operation? Based on Cadia, I'm not sure.

Mines and regulators might need to work more closely together with communities. The public needs to be able to make sure government agencies are doing their job and every mine operates in an environmentally clean and safe manner. The mining industry has to do better to earn the trust of the community and its “social licence” to operate.

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Cadia Gold Mine near Orange ordered to fix dust pollution after heavy metals found in locals' blood, water



By Joanna Woodburn

ABC Central West

Gold

Tue 30 May 2023 at 2:29pm



Residents have expressed concern about dust lifting off Cadia Gold Mine, like this instance in April 2022. *(Supplied: Cadia Community Sustainability Network)*

Cadia Gold Mine in central western New South Wales has been given a series of deadlines to show it is complying with its obligations to prevent air pollution.

The Environment Protection Authority (EPA) has issued a final prevention notice, outlining the steps that must be taken to reduce emissions from the site and reassure the community.

The action was prompted by [blood and water testing that was ordered by local residents](#) and returned high levels of heavy metals like lead, nickel and selenium.

Cadia has just over a week to provide an interim report on emissions from an air vent which has been a cause of concern for residents.

It must then present a final report on sampling of this vent shaft two weeks later.

"The sampling within the vent has to be undertaken by highly trained skilled operators," EPA executive director Carmen Dwyer said.

"That data will be provided to the EPA and we will draw our own conclusions from that data."

Key points:

- Cadia Gold Mine has been given until June 23 to report on dust emissions
- A pollution prevention notice has been issued after heavy metals were found in residents' water and blood
- Community members have had concerns about the mine's impacts for years

The details of the final pollution prevention notice have heartened the local community but residents say they are concerned about the sampling methods being used.

"The community now has a timeline to watch and observe and see what the reports and the results come back as," Cadia Community Sustainability Network chair Gem Green said.



Stu and Gem Green farm alongside Cadia Gold Mine and say they have been experiencing dust since 2018. (ABC Central West: Luke Wong)

"There are still a few muddy areas of who's collecting what and how that will be processed and how that will be reported on.

"We'll be keeping in close touch with the EPA to get a more definitive interpretation of how that will be done."

District monitoring

The mine must simultaneously review its existing air sampling network and produce a report identifying suitable locations for more units to be installed in the district.



Dust rising off Cadia Gold Mine near Orange in August 2022. *(Supplied: Cadia Community Sustainability Network)*

Ms Dwyer said the air monitoring sites would be decided in consultation with Cadia and the community.

"We have a look at dispersion modelling and climatic modelling and we talk to our experts about where that should occur," she said.

"We're also talking with the community to understand from their perspective with their local knowledge where should some of this stuff happen.

"The EPA is looking at what monitoring needs to occur within the community and sampling to provide that assurance to the community that are living with clean air and clean water."

Health concerns

The Cadia Community Sustainability Network said many residents were still concerned about what to do to protect their health while the mine was given time to comply with its regulatory obligations.

"Health-wise, people are still very unsure what to do ... we're obviously encouraging them to get a health assessment conducted," Ms Green said.

"We're probably in a little touch of no man's land at the moment, just with different government agencies sort of speaking with the community, and in the short term the community does need its water tanks

cleaned and refilled."

In a statement, a spokesperson for Cadia Gold Mine said it was cooperating with the EPA and already had work in progress to ensure it complied with the prevention notice.

"We do not compromise on people's health and safety and remain firmly committed to meeting all our obligations in a way that is aligned with our values," the spokesperson said.

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Posted Tue 30 May 2023 at 2:29pm

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