

11 August 2025

CCS Ref:1108

1. My name is Katherine Selby-Smith
2. I am an Environmental Engineer.

Code of Conduct

3. I confirm I have read the code of conduct for expert witnesses as contained in the Environment Court's Practice Note 2023.
4. I have complied with the code of conduct when preparing this statement of evidence and will do so if required to give oral evidence before the Expert Panel considering the application by Oceana Gold (New Zealand) Limited (**Applicant**) under the Fast-track Approvals Act 2024 (**Act**) to expand its existing gold and silver mining operations at sites in the Waihi North area of the Coromandel Peninsula, being Fast-track Application No. FTAA-2504-1046 (the **Waihi North Project Application**).
5. The data, information, facts and assumptions I have considered in forming my opinions are set out in my evidence to follow. The reasons for my opinions expressed are also set out in this evidence.
6. Unless I state otherwise, this evidence is within my sphere of expertise and I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.
7. My qualifications, relevant experience and basis for my expertise are as set out above.

Documents Reviewed

8. In preparing this evidence, I have focused my review on my counterpart expert. I have therefore reviewed the following:

B.07 Beca 'Willows Farm Stormwater Management Report ' dated 24 February 2025

B.25 GHD 'Waihi North Project Water Management Studies (WAI-985-000-REP-LC-0011_Rev3)' dated 17 February 2025

9. I have also generally reviewed the first iteration of consent conditions. I have not reviewed, but seek an opportunity to review, the latest iteration of consent conditions, and related documents. Unfortunately these arrived too late in preparation of my evidence.
10. I also note that I have not yet had the opportunity to undertake a site visit.
11. I have reviewed the following documents which forms part substantive application documents for the Waihi North project under the Fast Track Legislation.
12. I reviewed two documents and have provided commentary below each.

B.07 Beca 'Willows Farm Stormwater Management Report ' dated 24 February 2025

13. The stormwater philosophy uses the following industry standards;
- Waikato stormwater runoff modelling guideline (TR2020/06), Waikato Regional Council.
 - Waikato stormwater management guideline (TR2020/07, updated May 2020), Waikato Regional Council.
 - Regional Infrastructure Technical Specifications (RITS), Waikato local Authority Shared Services.
14. Essential to any stormwater design is choosing the appropriate rainfall data. The Beca design uses *'The rainfall data was obtained from HIRDS (June 2021) and uses the RCP 8.5 data for climate change to 2050. Climate change to 2050 has been selected as this is a temporary site and is not expected to in operation for more than 30-years. design follows the WRC guidelines and is follows standard industry practise in the design'*.



15. They are using the highest RCP scenario and correct timeframe (if the project has a 30-year design life). However, they indicate they are using rainfall data obtained from HIRDS in June 2021. I checked the latest version of HIRDS rainfall data and there has been an increase of 24-hour rainfall depth. In the report they use 152mm, 238mm, 369mm for the 24-hour rainfall depth for the 50% AEP, 10% AEP and 1% AEP events respectively. These figures in HIRDS are now 161mm, 252mm and 394mm.
16. As this is the preliminary design, I would assume they would obtain the latest HIRDS figures available for the design. This would result in increased runoff volumes but I would also assume that this can be factored into the final stormwater design (e.g. longer swales or larger detention pond).

B.25 GHD 'Waihi North Project Water Management Studies (WAI-985-000-REP-LC-0011_Rev3)' dated 17 February 2025

- Section 2.3.2 Regime Compliance (pg 17)
17. The tables and commentary uses data from the existing wastewater treatment plant from January 2019 to December 2020, which the report states "*WTP is currently operating within the compliance criteria as outlined in RC 971318*".
 18. This data is 5 years old, and does not confirm the WTP is 'currently' operating within the compliance criteria.
- Section 2.3.3 In-stream compliance (pg 19)
19. The tables and commentary uses data from the in-stream water quality from January 2019 – March 2021, which the report states "*Ohinemuri River water quality is currently within the compliance criteria for all relevant parameters*".
 20. This data is 4 years old, which does not confirm the in-stream water quality is within the compliance criteria.
- Reference document 2025b or EGL 2025b?
21. This document is referenced as GHD (2025b) on page 26, page 28, page 29 (referring to rainfall record and stream data)

22. This document is referenced as EGL (2025b) in Figure 22 page 45 (Proposed TSF3 Collection Pond)

23. In the references, there is no GHD report from 2025 only 'EGL, 2025b. *Oceana Gold (New Zealand) Limited. Tailings Storage Facility. Storage 3 RL155. Technical Report.*'

24. Therefore I reviewed the EGL report;

- There is no reference to rainfall data collected in the Wharekirauponga catchment, therefore statements in Section 3.1.1 (page 26) are incorrect.
- In Section 3.2.1 (pg 28) references baseline flow data for the Mataura Stream. There is no reference in the EGL document.
- Section 3.2.2 (pg 29) references baseline flow data of the Wharekirauponga. There is no reference in the EGL document.
- Figure 22 in the report is from the EGL report (Appendix a)

25. Further investigation indicates this is probably a typo and is meant to refer to WWLA, 2024a. Q2 June 2024 – Hydrological Monitoring Summary. Wharekirauponga Stream Catchment and Mataura Stream Catchment Quarterly Flow Gauging. Rev1.

Report prepared by;



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LIMITATIONS

- Coromandel Consultant Limited (CCL) has prepared this report for the exclusive use by Coromandel Watchdog of Hauraki for the WUP proposed underground mine.