
**STATEMENT OF EVIDENCE OF ALICE ANDERSON ON BEHALF OF HAKO
TŪPUNA TRUST IN RESPONSE TO THE WAIHI NORTH PROJECT**

25 August 2025

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HAKO TŪPUNA TRUST**

1. My name is Alice Te Ara Anderson. I am a descendant of Ngati Hako. I was born and raised in Paeroa. My principal marae is Te Kotahitanga Marae at Tirohia, which is south of Paeroa. I am a Trustee of Te Kotahitanga Marae. I have lived all my life in the Hauraki area.
2. I am also a trustee of Hako Tūpuna Trust which is the mandated Post Settlement Governance Entity (PSGE) for Ngāti Hako. Previously, the applicant Oceana Gold Limited (OGL) engaged with Te Kupenga O Ngati Hako Incorporated which was the mandated organisation for dealing with resource management issues.
3. My constituency includes the three Ngati Hako Marae which are Paeahi at Waitoki, Te Kotahitanga at Tirohia and te Iti O Hauraki at Kerepehi. Ngāti Hako is also strongly connected by whakapapa (genealogy), whenua (land) and history to the both Waihi Community Marae and Makomako Marae at Kaiaua.
4. I am currently employed as Kaitohu Matua – Treaty Relationships for the Department of Conservation (DOC) within the Hauraki District office located in Thames. In my time at DOC, I was responsible for engagement with Hauraki iwi on the Waihi North Project.
5. Today, I am authorised to provide this brief of evidence on behalf of Hako Tūpuna Trust.
6. The Hako Tūpuna Trust objects to Waihi North Project as the potential impacts of underground mining will have a significant cultural impact on the whenua (land), moana (sea), awa (rivers and streams), puna (springs), taonga species and urupa/waahi tapu (sacred places).

7. Ngāti Hako recommends that the Panel decline the Waihi North Project as it will have a significant cultural, ecological, environmental impacts on the environment and its ecosystems. We believe that although the technical reports acknowledge that a precautionary approach should be taken, there are gaps in the technical reports that does not provide a high level of confidence to Ngāti Hako. Until such evidence is provided, then there is uncertainty as to the potential impacts of the project.

Application

8. OGL has made application through the Fast track process to expand the existing gold and silver mining operations, including establishing new open pit and underground mines, and extending the life of the mine from expiry in 2030 to 2040, including:

- exploration drill sites within Department of Conservation land, including 4 ventilation shafts and 4 new geotechnical drilling sites
- a new underground mine at Wharekirauponga with associated twin decline access to explore and mine including 4 ventilation or escapeway shafts capped at surface
- a new open pit on Oceana Gold (New Zealand) Limited's private land at Gladstone Hill (with capacity to co-dispose waste and tailings)
- a third tailings storage facility plus a new rock storage facility (with capacity to co-dispose waste and encapsulated filtered tailings).

The project is referred to as 'Waihi North'.

Scope of Submission

9. Hauraki iwi have been given the opportunity to comment on the Waihi North Project. The issues to be raised by Ngāti Hako include:-

- (a) Consultation
- (b) Treaty of Waitangi Matters
- (c) Hauraki Iwi Environmental Plan
 - (i) Impacts on Taonga species;
 - (ii) Effects on water – Groundwater/Freshwater
 - (iii) Ecosystems & species
- (d) Biodiversity Project

10. Given the limited timeframes and iwi capacity to complete these submissions, we have focused on key areas of concern to Ngāti Hako. We would like to support the submissions put forward by Coromandel Watch Dog and their technical evidence on frogs, freshwater ecosystems, and Environment and Socio - Economic Impacts of impacts of Tailings Dams.
11. Ngāti Hako also supports the technical reports produced by the Department of Conservation on freshwater fisheries, wildlife approvals., concessions and access arrangement.

Consultation

12. Ngati Hako has a longstanding relationship with the mining companies in Waihi. Ngāti Hako has maintained a consistent approach to opposing mining since the opening of the Ohinemuri for mining in the 1860's. In more recent times, Ngāti Hako have opposed mining applications for Favona (2004), Trio (2012), MEP (2012), Correnso (2013) and Project Martha Project Martha (2019).
13. Although consents have been granted, Ngāti Hako have continued to engage with the various mining companies of the time as a commitment to their kaitiaki responsibilities to seek balance and restoration of mauri to the whenua, awa, moana, puna and taonga.
14. We acknowledge the ongoing relationship with OGL over the time they took ownership of Pukewa and their efforts to maintain a genuine relationship with Ngāti Hako. Since 2017, there have been ongoing discussions about Wharekirauponga and more recently over the past 12 months to progress discussions on the Biodiversity Project.
15. Over the past several years, engagement with Ngāti Hako has been sporadic and the latest discussions have been focused at the Biodiversity Project. With the introduction of the Fast Track Act 2024, OGL withdrew from the RMA process and submitted under the new legislation to accelerate their application. From Ngāti Hako's perspective, the transition from Resource Management process to Fast

Track has left outstanding matters unresolved for iwi with limited timeframes and resources to respond.

16. This year, I took over the engagement with OGL to progress discussions with the Waihi North project. I have attended three meetings since April 2025. In April 2025, Ngāti Hako raised with OGL that the Biodiversity Project was an offset measure and could not mitigate the significant impact that the Waihi North project would have on the mauri of the whenua, awa, taonga and moana. Ngāti Hako raised that they wanted to address the key outstanding concerns that were unresolved in the previous process. Some of these issues that were raised included groundwater, freshwater, vibration and taonga (frogs).
17. On August 1 2025, OGL organised a meeting of Hauraki iwi to discuss groundwater effects. Other hui relating to freshwater, vibration and frogs were to be held but short timeframes to prepare submissions, coupled with iwi availability to meet has resulted in the inability of iwi and OGL to meet and conclude their engagement before the submission closure date.
18. Therefore consultation has not been adequately completed with OGL. Although I acknowledge that OGL have maintained an “open door to consultation”, the Fast Track process accelerated timeframes and we have been unable to meet to conclude discussions.

Treaty of Waitangi Matters

19. Ministry for the Environment prepared a report under Section 18 of the Fast-Track Approvals Act 2024 in response to OceanaGold’s proposed mining expansion in Waihi North. The report outlines key implications for iwi and recommends actions to ensure Treaty settlement obligations, statutory acknowledgements, and cultural values are upheld throughout the Fast-track process.

20. The Fast-track Panel is legally required to act consistently with signed deeds of settlement. Of particular relevance to Ngāti Hako is the Pare Hauraki Collective Redress Deed that includes for:-
 - Conservation Decision-Making (section 4); and
 - Establishment of a Catchment Authority for Waihou, Piako, and Coromandel (Section 5)
21. Clause 5.2 of the Deed outlines the purposes of the Catchment Authority which will be “to provide co-governance, oversight and direction for the taonga that is the waterways of the Coromandel, Waihou and Piako catchments (see map attached as Appendix 1) in order to promote a “coordinated and intergenerational approach” (5.2.1) and “The Pare Hauraki World View and Programme for a Culture of Natural Resource Partnership” (5.2.2).

The implication is that while the Pare Hauraki Collective Redress Deed has not yet been legislated, this signals future co-governance intent.
22. Ngāti Hako requests that the Panel ensures that its decision making aligns with the principles and intent of the Catchments Plan, especially regarding discharges and ecosystem impacts. We ask that the Panel consider the Pare Hauraki World view and Programme for a Culture of Natural Resource Partnership to ensure that iwi rights and interests are acknowledged and that their concerns are mitigated appropriately when considering whether to approve or decline the Waihi North project.
23. Ngāti Hako has not concluded its Crown Treaty negotiations. This essentially means that Ngāti Hako must assert its rights explicitly in all engagement with the Panel, referencing settlement text and redress provisions to ensure protection of its negotiated redress. In our view, this is a fundamental flaw of the FFTA legislation in that it only recognises signed deeds of settlement.
24. Pukehangi Maunga (14.3 ha) is a joint site that will be transferred back in fee simple to Ngāti Hako and Ngāti Maru. The Map is unclear as to the exact boundary line of the Waihi North Project area and the northern concessioned area. This maunga was raised within the section 18 MfE report with the potential overlap of interests within the project area.

25. Ngāti Hako requests that the Panel seeks comment from the Minister for Treaty Negotiations to clarify redress implications.

Assessment of application against Hauraki Iwi Environmental Plan

26. Technical reports have been submitted by OGL to support their application for consideration by the Fast Track Panel. The Panel is responsible for assessing the activities of the Waihi North Project. In the absence of a Cultural Values Assessment for Wharekirauponga, Ngāti Hako has considered the Waihi North Project and measured the activities against *Whaia Te Mahere Taiao a Hauraki* — the Hauraki Iwi Environmental Plan (HIEP).
27. This is a foundational document that articulates the environmental, cultural, and spiritual values of iwi across the Hauraki rohe. It provides a robust framework for assessing development proposals, particularly those with potential to impact freshwater, coastal ecosystems, and sites of significance.
28. The HIEP is a formally adopted iwi planning document under the Resource Management Act 1991 (Section 35A), and must be given meaningful consideration in all consent processes. It reflects the collective aspirations of Hauraki iwi and hapū, and is grounded in mātauranga Māori, tikanga, and kaitiakitanga. Ngāti Hako was a significant contributor to the development of this Plan alongside other Hauraki iwi and believe that although the planning is over 20 years old, its issues, objectives and outcomes are still relevant today.
29. The HIEP articulates a 50 year vision for restoring the mauri of the Hauraki natural environment, cultural heritage and a future where forests are alive with bird song, waterways are clean and abundant with fish, and iwi exercise full kaitiakitanga”
30. At the heart of the plan are values that shape how Hauraki iwi engage with environmental decision-making:
- **Mauri** is the life force that flows through all ecosystems, species, and landscapes.

- **Kaitiakitanga** reflects inherited obligations to protect and restore the whenua, wai, and taonga species.
- **Rangatiratanga** affirms the right of iwi to exercise authority over their lands and resources.
- **Mātauranga Māori** must be integrated alongside Western science in all environmental assessments. Seasonal indicators, species relationships, and tikanga-based restoration practices offer critical insights into ecosystem health.
- **Tikanga and Wairuatanga** guide appropriate behavior and spiritual connection to the environment. Wāhi tapu, ancestral landscapes, and traditional harvesting areas must be protected from disturbance and degradation.
- **Whanaungatanga and Manaakitanga** promote respectful relationships between iwi, agencies, and communities.

31. These values are reflected across the Atua domains of the Plan each highlighting key environmental pressures:

- **Papatūānuku (Land):** Sedimentation, mining, erosion, waste.
- **Tangaroa Wai Māori (Freshwater):** Habitat degradation, pollution, fisheries decline.
- **Tangaroa Wai Tai (Coastal):** Shellfish depletion, marine pollution.
- **Tāne Mahuta (Forests):** Biodiversity loss, pest species.
- **Ranginui (Sky):** Climate change, air quality.
- **Rongomātāne (Heritage):** Loss of wāhi tapu, IP rights, GE concerns.

32. For Ngāti Hako, each domain provides a lens through which the Waihi North Project should be critically assessed, not only for its ecological footprint but for its cultural integrity and alignment with iwi aspirations.

Protection of Taonga species

33. Archey's Frogs are an important taonga to Hauraki iwi. In 2018, the late Liane Ngamane of Ngāti Tamaterā and Pauline Clarkin of Ngāti Hako provided feedback

to DOC about the significance of these taonga and the cultural landscape of Wharekirauponga. A Summary of their key statements are outlined below:-

- Wharekirauponga is a culturally and ecologically significant site within Te Paeroa-o-Toitehuatahi (Coromandel Ranges), encompassing *pa*, *kainga*, *waahi tapu*, *waahi pakanga*, *maunga*, and *awa*. Archey's frog, a critically endangered native species, resides within this landscape and is regarded by iwi as a *kaitiaki o te taiao*—a guardian of environmental and spiritual wellbeing.
- Hauraki iwi have a special relationship with the Archey's frogs and they are seen as a *kaitiaki o te taiao* (guardians of the environment).
- Sustaining the mauri of a taonga, whether a resource, species or place, is central to the exercise of *kaitiakitanga*." Archey's frogs embodies mauri and is integral to iwi identity.
- Iwi do not believe current data adequately reflects population health or vulnerability.
- They do not believe that there is enough data that identifies the nature and extent of the population or that the exploratory drilling and ground disturbance will have any effects on the Archey frog population at Wharekirauponga.
- [Further] research and monitoring [is] needed to understand effects on the health and wellbeing of Archey's frogs.
- Hauraki *kaitiaki*" urge[d] DOC to undertake more focused monitoring in the Wharekirauponga area to identify the nature and extent of the resident population of Archey's frogs."
- Although funding was offered for frog monitoring to be undertaken, iwi representatives wanted to ensure that the biodiversity protection is not compromised by financial or procedural trade-offs.

34. Ngāti Hako's position has not changed since 2018 in that there is still insufficient evidence to clearly suggest that the Archey's frog is not and will not being affected by the Waihi North Project. It is disappointing that DOC have not advocated for the Archey's frog despite calls from iwi to do so.

35. We acknowledge the work that OGL has undertaken in frog monitoring and population modelling but believe that more robust technical information and discussions are required.
36. Ngāti Hako supports the technical expert evidence provided by Bruce Waldman on behalf of Coromandel Watchdog. Protection of Archey's frog that is critically endangered should be a high priority.
37. We also acknowledge the technical evidence provided by DOC in so far as it raised key issues regarding the impacts on wildlife, freshwater ecosystems, vibration effects and pest control.
38. Therefore, we believe that the Panel has a responsibility to consider Mātauranga Māori and cultural values in their assessment of the Waihi North Project and ensure that decision-making reflects both ecological science and cultural concerns identified above.

Effects on Water (Tangaroa Rerenga Wai Māori)

39. For Māori, wai is not just a resource, it is a living entity with its own mauri. There are different types of water such as Wai Māori (freshwater), Wai Tai (Salt water), Wai Ariki (Springs). Water can pass through different states of ora (wellbeing) and many streams, rivers are named to reflect the state of wai, a tohu whenua (land mark) or identify if anything has happened at place. For example Waikino (Turbulent waters), Waimate (Dying waters) or Waitekauri (Waters of the kauri).
40. Water is a taonga tuku iho and can reflect the health of the people and the land. "Ko te wai o te ora o ngā mea katoa – Water is the life of all things". Rivers, springs, and wetlands are sacred spaces, often associated with wāhi tapu and ancestral stories. The presence of clean, flowing water is essential for rituals, healing, and spiritual cleansing and any activity that affects the mauri of the water will have a direct impact on iwi and their wellbeing. Water is part of a holistic worldview—it connects to Papatūānuku (Earth Mother), Ranginui (Sky Father) and all living things.

41. The domain of Tangaroa as outlined in the HIEP encompasses all water bodies—rivers, lakes, wetlands, and the ocean—where wai flows and sustains aquatic life.
42. The domain of Tāne Mahuta includes forests, birds, and land-based ecosystems that rely on water for nourishment and balance. Wai is what connects these domains, linking the mauri of aquatic and terrestrial realms. The degradation of wai disrupts both domains, weakening the genealogical connection that binds people to Atua and ecosystems. Restoring wai is an act of restoring balance between Tangaroa and Tāne Mahuta, reaffirming Māori cosmology and environmental stewardship.
43. The Waihi North Project traverses’ areas of high cultural and ecological sensitivity, including the Otahu catchment, Wharekawa estuary, and coastal margins of Tikapa Moana. On pp19-20 of the HIEP, it Tangaroa Rerenga Wai Māori (Freshwater Ecosystems) and Tangaroa Rerenga Wai Tai sections of the HIEP are particularly relevant to the Waihi North Project.
44. The HIEP refers to Extractive Industries and states: “Extraction of gold, silver and other mineral resources has left long-standing environmental problems in the Hauraki tribal region. Today, the disposal of wastewater, chemicals and spoil from the mining process, although much improved, remains an environmental concern to Hauraki Whānui. The extraction of mineral resources such as peat mining, rock, sand and shingle from our wetlands, rivers, streams and beaches continue to have impacts on our environment”¹.
45. On August 1 2025, Hauraki iwi representatives met with OGL to discuss groundwater effects of the Waihi North Project. In their presentation it stated that they “The streams above the ore body are significant in terms of their natural state values and their cultural importance. For these reasons a cautious approach has been adopted to assessment of potential effects and in terms of designing management response that is suitably adaptive. To provide the necessary safeguards a comprehensive suite of consent conditions and a groundwater management plan have been developed. The plan outlines how groundwater

¹ Hauraki Iwi Environment Plan – March 2004 Hauraki Māori Trust Board p15

conditions will be monitored as mining progresses, to ensure any interaction with surface systems is identified early and managed using best- practice controls”²

46. The information hui discussed the decommissioning of a natural warm spring, the creation of stream diversions and management of freshwater species. I am not a technical expert on groundwater effects, but I have read the evidence of Russell Death on freshwater ecosystems on behalf of Coromandel Watch Dog and agree with his comments and recommendations.
47. Ngāti Hako does not support the decommissioning of a natural warm spring as it is seen as a taonga of cultural importance to iwi. Furthermore, creating stream diversions that are “ecologically functional” is inconsistent with the HIEP in that streams, waterways and wetlands are to be preserved, protected and enhanced.
48. Another issue of concern to Ngāti Hako is ensuring that contaminants do not enter streams and enter the Ohinemuri river that meets the Waihou river and flows into Tikapa Moana. This could have significant impacts on our kai moana, fisheries and marine mammals of significant importance to Hauraki iwi. The Ohinemuri, Waihou and Piako rivers are Tūpuna Awa to Hauraki iwi. Tikapa Moana (Firth of Thames) and Te Tai Tamawahine (eastern seaboard of the Coromandel Peninsular) are significant seascapes to that are covered under the Hauraki Gulf Marine Park Bill currently in its final reading in Parliament.
49. The Waihi North Project has the potential to threaten these taonga. Ngāti Hako believe that further technical information is required to address the gaps identified in the evidence of Mr Death on freshwater ecosystems. Ngāti Hako respectfully asks the Panel to ensure that the Waihi North project does not diminish the mauri of water, through sedimentation, habitat loss, and disruption of ecological processes.

Biodiversity Project

50. Ngāti Hako initially participated in discussions with OGL and their consultant Lou Sanson when the Biodiversity Project was first introduced. Since that time, Ngāti Hako has had limited engagement with OGL and the wider iwi on the Biodiversity Project.

² Waihi North Project – Groundwater Effect Hui 1 August 2025, Paeroa

51. In April 2025, Hako informed OGL that the Biodiversity Project is framed as a Biodiversity enhancement opportunity for Hauraki iwi to participate in undertaking projects within the Wharekirauponga area. The HIEP promotes iwi lead enhancement projects that contribute to biodiversity, freshwater ecosystems, Taonga species recovery, pest control and restoration programmes.
52. The fundamental concern for Ngāti Hako is that however positive these outcomes may be in the future, it primarily functions as an offset measure that cannot mitigate the cultural impacts on underground mining. Ngāti Hako understands that the Biodiversity Project is subject to approval of the Waihi North Project.

Conclusion

53. Ngāti Hako continues to maintain its opposition to the extension of underground mining as part of the Waihi North Project as the cultural impacts on the mauri of the whenua, moana, awa, taonga and puna. There are gaps in the technical reports that have been submitted by OGL and these reports do not provide for cultural values.
54. Ngāti Hako recommends that the Panel decline the application.