

CENTRAL OTAGO

winegrowers

Central Otago Winegrowers Association
28 Ray Street, Cromwell PO Box 155, Central Otago 9342

14 November 2025

Environmental Protection Authority
366 Lambton Quay
Wellington 6011
New Zealand

By email: fasttrack@epa.govt.nz

Tēnā koutou,

Re: Santana Minerals, Bendigo-Ophir Gold Project (Fast Track Approvals Act 2024)

We write on behalf of the Central Otago Winegrowers Association (COWA), representing 100 vineyard owners and wine producers across the Central Otago region. Collectively, our members are custodians of one of Aotearoa New Zealand's most distinctive and internationally recognised winegrowing landscapes.

Santana Minerals Limited has submitted an application for the Bendigo–Ophir Gold Project under the Fast-Track Approvals Act 2024 (FTAA). Given the project's scale, location, and potential for both direct and indirect impacts on the wine industry and wider regional economy, we respectfully request to be formally recognised as an affected party and invited to comment on the application under section 53 of the FTAA.

Basis for our request

The proposed project sits within the heart of the Central Otago wine region and immediately adjacent to the Bendigo subregion, which alone represents approximately a quarter of the region's vineyard area. The "Central Otago" and "Bendigo" names are globally synonymous with premium wine, sustainability, and pristine landscape values - attributes that underpin both the local economy and New Zealand's broader wine and tourism brands.

We have previously written to the Prime Minister and other Ministers outlining the deep concerns of our sector regarding this proposal's potential to cause irreversible damage to the region's environment, reputation, and long-term economic resilience. Those same issues are directly relevant to the EPA's consideration under the FTAA, due to their likelihood of causing significant adverse effects on existing industry, offsetting any regional or national benefits intended by the project.

Specifically, our concerns include:

1. **Reputational damage and economic effects** – The proximity of a large-scale open-cast mine to organic and sustainably certified vineyards undermines the integrity of New Zealand's global wine brand. Even the perception of contamination or industrialisation threatens export markets, investor confidence, and tourism value.
2. **Water availability and contamination** – Shared aquifers and water sources may be impacted by the project's proposed extraction and cyanide processing operations, posing unacceptable risks to viticulture, potable supply, and certification status. In any instance of the water supply becoming contaminated, the effects would be catastrophic to the region affecting not only vineyards and horticulture but also every other business and household in the region reliant on water. Water is the lifeblood of Central Otago as it is essentially a desert landscape without it.

3. **Airborne contaminants and dust** – Arsenic and particulate emissions from ore processing and haulage are incompatible with food production and the health of vineyard ecosystems. It is likely that exports of wine may be adversely affected, as many of our key export markets have strict requirements around maximum residue limits (MRLs) for arsenic.
4. **Labour and infrastructure pressures** – The influx of an industrial workforce would place further strain on already limited regional housing and labour markets. We believe these effects to be significant.
5. **Cumulative effects on the wider region** – The exploration permit area extends over a vast area, raising concern about future expansion and the precedent it may set for further mining within viticultural zones.

Alignment with other affected parties

We note that a collective of Bendigo winegrowers has also written to the EPA expressing similar concerns about the project's proximity, water use, and reputational implications. As the regional industry body, COWA supports and reinforces those concerns on behalf of the wider Central Otago wine community.

Request for engagement

We therefore respectfully request that the EPA recognises the Central Otago Winegrowers Association as an affected party and provides an opportunity for us to comment on, and where appropriate, present evidence to the Expert Consenting Panel once convened. The EPA will be aware that the rights of neighbours and other affected parties are extremely limited under the FTAA, it is our view that the effects of this project in this location are many and nuanced and more information from various parties in this instance will significantly enrich the quality of information that is available to a future panel for consideration.

Given the strategic importance of the wine industry to Central Otago's economy and reputation, with potential significant effects, we seek assurance that our sector's interests and expertise will be properly represented and that the Fast-Track process allows for meaningful participation commensurate with the scale of potential impact.

We appreciate the EPA's role in ensuring that the Fast-Track process upholds transparency, fairness, and robust consideration of environmental, cultural, and economic factors. We would welcome further correspondence regarding our inclusion in this process.

Nāku noa, nā



Carolyn Murray
General Manager,
on behalf of the Board of Directors
Central Otago Winegrowers Association

Central Otago Winegrowers Association
28 Ray Street, Cromwell PO Box 155, Central Otago 9342

8 December 2025

Environmental Protection Authority
366 Lambton Quay
Wellington 6011
New Zealand

By email: fasttrack@epa.govt.nz

Tēnā koutou,

Re: Follow-Up to Request for recognition as a person that should be invited to comment - Santana Minerals Bendigo-Ophir Gold Project (FTAA 2024)

We write further to our letter of 14 November 2025, in which the Central Otago Winegrowers Association (COWA) requested recognition as an affected party (or perhaps, more correctly, to be recognised as a person that should be invited to comment) for the Fast-Track assessment of the Bendigo-Ophir Gold Project.

Since that submission, COWA has engaged independent experts to assess the likely effects of the proposed mine on vineyards, wine production, adverse risk on export markets, and the wider Central Otago industry. These expert investigations reinforce that the project has the potential to generate significant and measurable adverse effects on an existing, nationally important primary sector.

Expert assessments now underway

1. Dust, Arsenic & Contaminants – Rex Sunde, Fantail Viticulture Consultants

- Assessing risks of dust-borne arsenic contaminating grapes and wine, including potential to exceed maximum residue limits (MRLs).
- Identifying mitigation options for growers and acute operational impacts.
- Evaluating long-term soil accumulation and implications for vine and soil health.
- Investigating possible winemaking consequences if contamination occurs.

2. Wind Movement & Dust Dispersion – Lauren Windross, Williams Water

- Reviewing dust discharge plans and air quality assessments.
- Assessing the likely movement and extent of dust under regional wind conditions.
- Evaluating the sufficiency of proposed management and monitoring, and identifying consent conditions needed to protect vineyards.

These assessments go to core issues of product safety, certification, land use capability, and the international reputation of the Central Otago wine region.

Renewed request for recognition as a person that should be invited to comment

Given the scale and proximity of the proposed mine, and the expert evidence now being prepared, COWA reiterates and strengthens its request to be formally recognised as person that should be invited to comment under the Fast-Track Approvals Act, and to be invited to comment once the application proceeds.

CENTRAL OTAGO

winegrowers

COWA is committed to providing the Expert Consenting Panel with clear, technical information to support a robust and well-informed decision. We ask that the EPA ensure our sector has the opportunity to participate meaningfully, commensurate with the significance of the potential effects.

This is a matter of fairness, natural justice, and proper procedure. COWA is currently investing in its independent expert advisors, and if it is to be denied the ability to participate then that cost will most likely be wasted. Yet it cannot wait given the tight timeframes under the current fast track process until it knows that it will be invited to comment to commence obtaining that independent expert advice. Any assurance the Panel Convenor, or, if (when) referred to a Panel, that can be given would be gratefully received.

COWA is prepared to participate in any Panel Convenor workshop, without prejudice to whether it may or may not be invited to comment later, by the Panel appointed – so that its issues (and any expert opinions) – can be properly put before the Panel Convenor/ Panel at the relevant time.

Thank you for your consideration. We welcome further correspondence regarding our involvement.

Nāku noa, nā

Carolyn Murray

Carolyn Murray
General Manager,
on behalf of the Board of Directors
Central Otago Winegrowers Association

Central Otago Winegrowers Association
100C Gair Avenue, Cromwell PO Box 155, Central Otago 9342

27 February 2026

Fast Track Expert Consenting Panel
c/- Environmental Protection Authority 366 Lambton Quay
Wellington 6011
New Zealand

By email: fasttrack@epa.govt.nz

Tēnā koutou,

**Re: Santana Minerals – Bendigo–Ophir Gold Project (FTAA 2024)
Resubmission of prior correspondence and request to be invited to comment**

We write on behalf of the Central Otago Winegrowers Association (COWA), representing approximately 100 vineyard owners and wine producers across the Central Otago region, and with the support of our national body, New Zealand Winegrowers.

COWA previously wrote to the Environmental Protection Authority on 14 November 2025, 8 December 2025, and 15 January 2026 regarding this project and our request to be recognised as a person who should be invited to comment under the Fast-Track Approvals Act 2024 (FTAA). We attach and resubmit those letters for completeness now that the Expert Consenting Panel has been convened. This is because we are uncertain if those letters would otherwise be provided to the Panel. This letter essentially summarises key elements and/or updates those earlier letters.

The proposed project sits within the heart of the Central Otago wine region and immediately adjacent to the Bendigo subregion, which represents approximately a quarter of the region's vineyard area. The "Central Otago" and "Bendigo" names are globally associated with premium wine, sustainability, and pristine landscape values that underpin both the regional economy and New Zealand's wider wine and tourism brands.

Given the scale, proximity and operational characteristics of the proposal, there is a credible risk of direct and indirect effects on vineyard productivity, soil health, water security, export confidence, tourism value, and long-term investment certainty in viticulture. These matters go directly to the Panel's assessment of environmental, economic and cumulative effects under the FTAA.

Dust, airborne contaminants and expert evidence

COWA has engaged independent technical experts to assess the potential effects of dust generation, ore processing and associated contaminants on vineyards and wine production.

Expert investigations currently underway include:

- Assessment of dust-borne arsenic and particulate deposition on vines and grapes.
- Evaluation of potential long-term soil accumulation and implications for vine health and land use capability.
- Review of air quality modelling and proposed dust management plans under Central Otago wind conditions.
- Identification of monitoring requirements and potential consent conditions necessary to protect food production and vineyard ecosystems.

These assessments raise substantive questions about the compatibility of large-scale gold mining activities with premium food production in immediate proximity. We are investing significant resources in this work in order to provide the Panel with clear, technical, and industry-specific evidence.

Water availability, contamination and permit duration

Water is the lifeblood of Central Otago. Viticulture in this semi-arid region depends on secure and reliable access to groundwater and surface water.

Our previous correspondence raised two related concerns:

(a) Risk to shared aquifers and water quality

The project proposes groundwater take and dewatering associated with open pits and underground mining, as well as cyanide processing operations. Any contamination event would have serious and widespread consequences for vineyards, horticulture, households and businesses across the region.

(b) Proposed 35-year water permits and equity concerns

Santana Minerals seeks 35-year water permits. This stands in stark contrast to the regulatory treatment currently applying to farmers and growers in Otago, where new permits are generally limited to much shorter durations under the transitional planning framework.

Granting long-term water security to a new mining operation, while existing primary producers operate under short-term certainty, raises material issues of equity, consistency and regional resilience. These matters are directly relevant to the sustainable management of Otago's water resources and to the fairness of the allocation regime.

Community Liaison Group – limitations on evidentiary weight

COWA has been invited to participate in the project's Community Liaison Group (CLG). While we support constructive engagement in principle, our January 2026 letter outlined structural limitations in the CLG model, including:

- Company control over governance, chairing and membership.
- No obligation on the company to substantively respond to feedback.
- No formal advisory or escalation pathway.
- Confidentiality provisions limiting independent communication.

Accordingly, while the CLG may assist with information dissemination, it should not be treated as evidence of effective consultation, community support, or social licence, and should carry limited evidentiary weight in the Panel's assessment.

Ongoing engagement with the applicant

COWA has engaged directly and in good faith with Santana Minerals over an extended period, including as recently as 20 January 2026. We remain willing to meet and discuss technical matters with the applicant.

However, direct engagement does not replace the need for formal participation rights in the FTAA process. Given the limited statutory rights afforded to affected sectors under the fast-track regime, Panel invitation is essential to ensure that sector-specific evidence is properly before you.

Renewed request

In light of the above, COWA respectfully requests that the Expert Consenting Panel:

1. Confirm that our correspondence has been received and placed before it.
2. Recognise the Central Otago Winegrowers Association as a person who should be invited to comment under the FTAA; and
3. Provide COWA with the opportunity to submit written comments and present expert evidence at the appropriate time.

We are committed to assisting the Panel to reach a robust and well-informed decision. Given the national and international significance of the Central Otago wine industry, and the scale and duration of the proposed project, meaningful participation by our sector is both appropriate and necessary.

Nāku noa, nā

Carolyn Murray

Carolyn Murray
General Manager,
on behalf of the Board of Directors
Central Otago Winegrowers Association

Central Otago Winegrowers Association
28 Ray Street, Cromwell PO Box 155, Central Otago 9342

15 January 2026

Environmental Protection Authority
366 Lambton Quay
Wellington 6011
New Zealand

By email: fasttrack@epa.govt.nz

Tēnā koutou,

Re: Further follow-up – Santana Minerals Bendigo-Ophir Gold Project (FTAA 2024) – Water permit duration and equity concerns

We write further to our correspondence of 14 November 2025 and 8 December 2025 regarding the Fast-Track assessment of the Santana Minerals Bendigo-Ophir Gold Project, and our request that the Central Otago Winegrowers Association (COWA) be recognised as a person that should be invited to comment. This letter raises two procedural fairness concerns relevant to the Panel's consideration of effects and engagement under the Fast-Track Approvals Act.

First, we wish to draw the EPA's attention to the duration of water permits being sought by Santana Minerals, and the contrast this represents when compared with the regulatory treatment currently applying to farmers and growers across Otago.

Proposed 35-year water permits

Santana Minerals is seeking water permits with a duration of 35 years for the Bendigo-Ophir Gold Project, intended to align with other project approvals and the long-term nature of the operation, including approximately 14 years of production followed by decades of rehabilitation and closure activities.

The application seeks 35-year permits to take and use groundwater from the Bendigo Aquifer for project water supply, and to dewater groundwater associated with the project's open pits and underground mine.

Contrasting treatment of farmers and growers in Otago

This proposed duration stands in clear contrast to the current legislative and policy framework in Otago. Under section 127B of the Resource Management Act 1991 and Policy 10A.2.2 of the Regional Plan: Water for Otago, new water permits are generally limited to a maximum of six years. Recent legislative amendments to Otago's Water Plan have extended many existing permits by only five years, as a temporary and pragmatic measure while the regional planning framework remains in transition.

Against this backdrop, granting a 35-year water permit to a new mining operation raises serious questions of equity, consistency, and fairness. Water availability and certainty are fundamental to viticulture in Central Otago, and decisions that lock in long-term access for one activity while constraining others to short-term certainty have material implications for investment, land use, and regional resilience.

These issues reinforce COWA's request to be recognised as a person that should be invited to comment. The duration and priority of water allocation sought by Santana Minerals are directly relevant to our members' interests and to the sustainable management of Otago's water resources.

Community Liaison Group – limitations on evidentiary weight

COWA has also been invited to participate in the Bendigo-Ophir Gold Project Community Liaison Group (CLG). While COWA supports constructive engagement in principle, it wishes to raise concerns regarding the structure and effectiveness of the CLG as set out in the Charter of Understanding.

As currently structured, the CLG is a company-led forum, with Santana Minerals/Matakanui Gold Limited retaining full control over governance, including appointment of the Chair and Secretary, agenda setting, member selection, and the authority to remove members. There is no independent chair or facilitator.

While the CLG may provide feedback and recommendations, the Charter imposes no obligation on the company to respond substantively, demonstrate how feedback has influenced project design or mitigation, or explain why concerns may not have been adopted. The CLG has no formal advisory status, no escalation pathway, and no linkage to regulatory decision-making.

Confidentiality provisions and company-controlled reporting further limit the ability of members to communicate concerns independently or express dissenting views.

Accordingly, while the CLG may serve as a mechanism for information dissemination, it should not be relied upon as evidence of effective consultation, community support, or social licence, and should carry limited evidentiary weight in the Panel's assessment of engagement and social effects.

Thank you for your consideration of these additional points. We remain willing and available to assist the EPA and any Panel appointed by providing further information or participating in workshops as appropriate.

Nāku noa, nā

Carolyn Murray

Carolyn Murray
General Manager,
on behalf of the Board of Directors
Central Otago Winegrowers Association