

Comments on Bendigo-Ophir Gold Project fast track application

6 April 2026

Sustainable Tarras
Tourism submission
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1. My name is Professor James Higham. I have been asked by Sustainable Tarras Inc to provide advice on the proposed Bendigo-Ophir Golf Project based on my longstanding academic interests in sustainable tourism.

Qualifications and experience

2. I am a Distinguished Professor at Griffith Business School Department of Tourism and Marketing, Griffith University (Australia), and Honorary Professor at Ōtākou Whakaihu Waka - University of Otago (Aotearoa New Zealand). My research addresses issues of sustainable tourism, tourism and global environmental change, and tourism carbon emissions.
3. I am widely published on aspects of tourism relating to sustainable development and climate change. Much of my research and publication is collaborative and interdisciplinary, with longstanding research collaborations with colleagues in Europe, the United Kingdom, Norway, Australia and Aotearoa New Zealand.
4. My most significant service roles have included Head of Department (2006-2011), member of the Tertiary Education Commission's Business and Economics PBRF research assessment panel (2012, 2018), co-editor of the *Journal of Sustainable Tourism* (2014-2021), and founding director of the University of Otago Tourism Policy School (2019-2023).
5. My current research includes multiple projects which focus on the future of tourism in high demand tourist destinations within New Zealand, including Central Otago. This includes a significant, multi-year research programme that investigates technology and the future of tourism in New Zealand, funded by the Ministry of Business, Innovation and Employment.
6. I am familiar with the proposed site of the Bendigo-Ophir gold mine and surrounding areas. As a mountain bike rider and bikepacker, I have biked over Thomson Gorge Road, most recently on a five-day tour of Central Otago in mid-March 2026, when I took extra time to re-visit the Dunstan Mountains and ride Thomson Gorge Road between Bendigo and the Manuherikia Valley.

Code of conduct for Expert Witnesses

7. I have read the Code of Conduct in Part 9 of the Environment Court Practice Note and have complied with it in preparing this paper.

Scope of paper

8. This paper addresses the following topics which are relevant to the Panel's assessment of the Bendigo-Ophir Gold Project:
 - a. Regional tourism context
 - b. Central Otago Resident Opinion Study (2024)
 - c. Compatibility with Destination Management Plans, vision documents and Economic Development Strategies
 - d. Risks to NZ's and Central Otago's region's tourism destination image
 - e. Impact on tourism industry and tourism-related sectors
 - f. Examples that illustrate the environmental risks of extractive industries for tourism.

Summary

9. Tourism is a major contributor to the economy of Central Otago, and a key economic driver.
10. A 2024 survey of Central Otago residents found that the qualities of life that residents most value about Central Otago were derived from 'Landscapes' and undisturbed 'Natural beauty'. Leisure and recreational values associated with unique landscapes were central to quality of life. These results in relation to landscapes and lifestyle align with CODC data from recent work on a 50-year vision for the district. The adopted Vision recognises that the state of wellbeing in Central Otago is grounded in respect for and protection of the natural environment. The survey results also reflect current regional Destination Management Plans. The Central Otago Destination Management Plan identifies protection of the natural environment and landscapes, maintaining the character of small towns and strong community identity and careful management of growth as key priorities. Documents from the Queenstown district (Queenstown Destination Management Plan and the Queenstown Lakes Spatial Plan) also strongly emphasise the importance of landscapes and environmental protection. There is significant potential for open cast gold mining to be inconsistent with the outcomes that the Destination Management Plans and Spatial Plan seek for Central Otago. These are outcomes that reflect shared community values.
11. The primacy of the unique Central Otago landscape is also evident in the *Central Otago Economic Development Strategy 2025-2035*. This Strategy emphasises that increasing economic prosperity hinges on embodying and championing Central Otago's unique regional identity.
12. There are risks to New Zealand's reputation as a tourism destination from open cast mining. Tourism relies heavily on natural resources such as landscapes, biodiversity, and quiet natural places. Protecting these environmental assets is therefore essential to maintaining the attractiveness of New Zealand as a destination and sustaining the tourism industry long term. If environmental degradation occurs—such as pollution, overcrowding at iconic sites, or damage to landscapes - it risks undermining the credibility of the 100% Pure New Zealand brand, and New Zealand's global reputation. The Central Otago and the Queenstown Lakes landscapes are an integral part of New Zealand's 100% Pure international brand and Tourism New Zealand's regional tourism marketing campaigns. There are also "closer to home" effects on the tourism industry and tourism-related sectors. There are many overseas examples of long-term environmental or reputational damage from mining directly impacting tourism.

Regional tourism context

13. Tourism is a major contributor to the economy of Central Otago and a key economic driver, bringing significant visitor spending into the region that supports employment, business growth, and regional development. Visitor spending makes a major direct contribution to the regional economy.
14. When people talk of “Central Otago” they are usually referring to an area comprising the Central Otago District Council area (including Roxburgh, Alexandra and the Maniototo, Cromwell, Tarras) plus the Queenstown Lakes District Council area (the Whakatipu Basin including Queenstown, Arrowtown, Glenorchy and Kingston, plus the Upper Clutha including Wānaka, Hawea, Cardrona and Luggate).

Central Otago District Council (CODC) area

15. In the year ending March 2023, tourists spent approximately NZ\$282 million in the Central Otago District Council area, which of course excludes Queenstown and Wānaka (Central Otago District Council, 2024). Tourist spending supports a wide range of local businesses, including accommodation providers, food and beverage, transport services, events and tour operators.
16. In 2023, 1,768 jobs in Central Otago were supported by tourism, accounting for about 12% of total employment, which is significantly higher than the national average of around 6.9% (Central Otago District Council, 2024). Tourist spending has been at the forefront of regional economy recovery after COVID-19 (Crux, 2023). Tourism also promotes regional industries such as wine production and fruit growing, while encouraging investment in infrastructure such as cycle trails and visitor facilities.

Queenstown Lakes District Council (QLDC) area

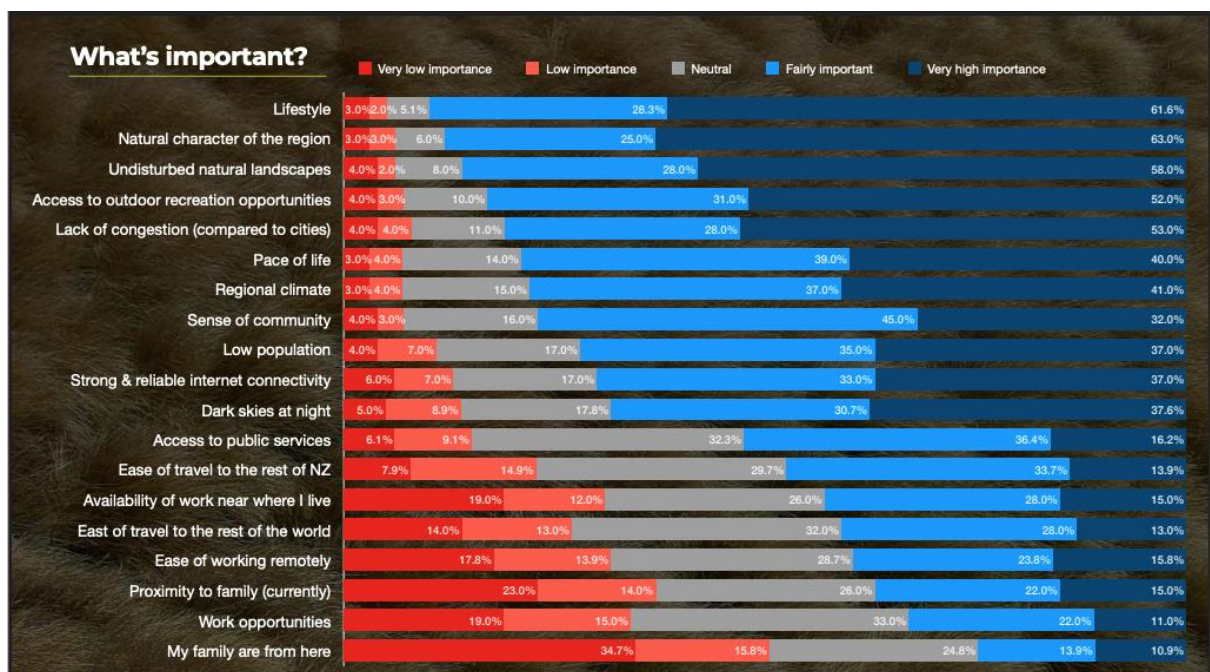
17. The Queenstown Lakes district is internationally recognised as a major tourism destination centred on Queenstown and Wānaka. Tourism makes a very large contribution to the regional economy through both employment and GDP.
18. In 2024 the tourism sector generated approximately NZ\$1.4 billion and accounted for about 30% of the district’s GDP, highlighting how dependent the region is on visitors (Infometrics, 2024). In 2023, tourism employed about 11,919 people in the Queenstown Lakes District, accounting for around 37.5% of total employment (Lake Wānaka Tourism & Destination Queenstown 2024), meaning more than one in three jobs are linked to the visitor industry (Infometrics, 2023).
19. Tourism also contributes a large share of the region’s economic output. Visitor spending supports many local industries including accommodation, hospitality, retail, transport, and adventure tourism activities. Tourism also drives infrastructure development and international promotion of the region.

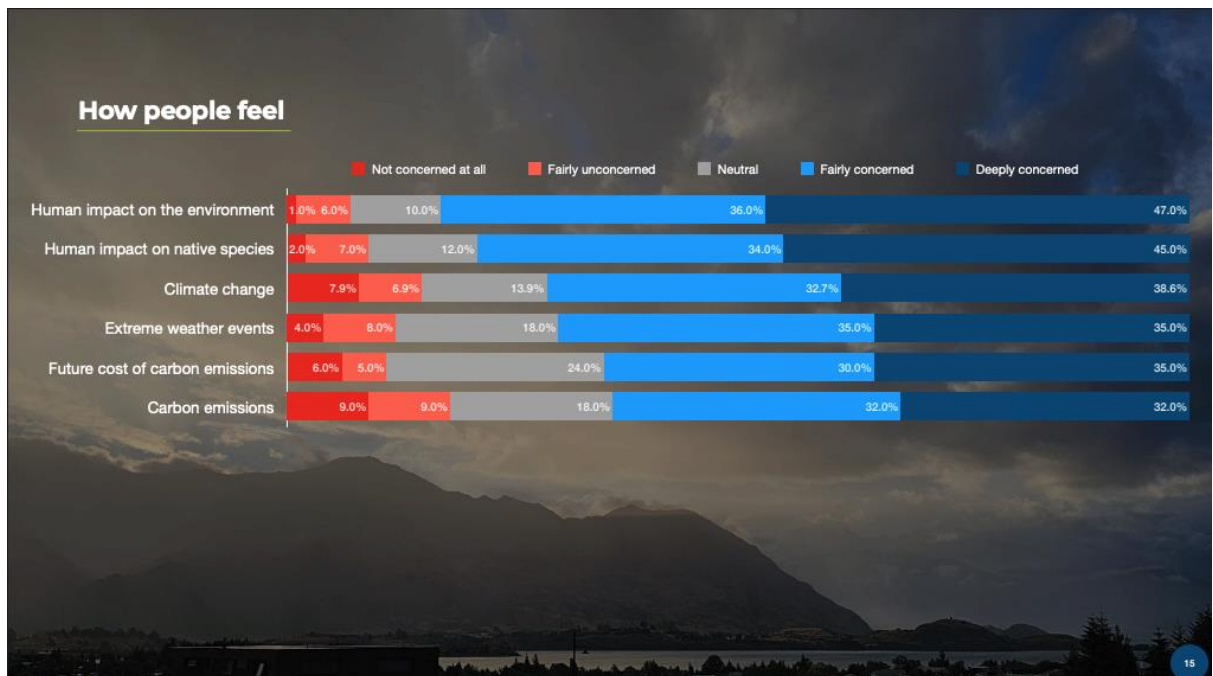
Central Otago Resident Opinion Survey (2024)

20. With Distinguished Professor Robert McLachlan (Massey University) and Professor James Renwick (Victoria University), I recently completed the most comprehensive survey of Central Otago residents to date, inviting about one household in every 13 across the region to participate. We investigated local perspectives on lifestyle, climate change,

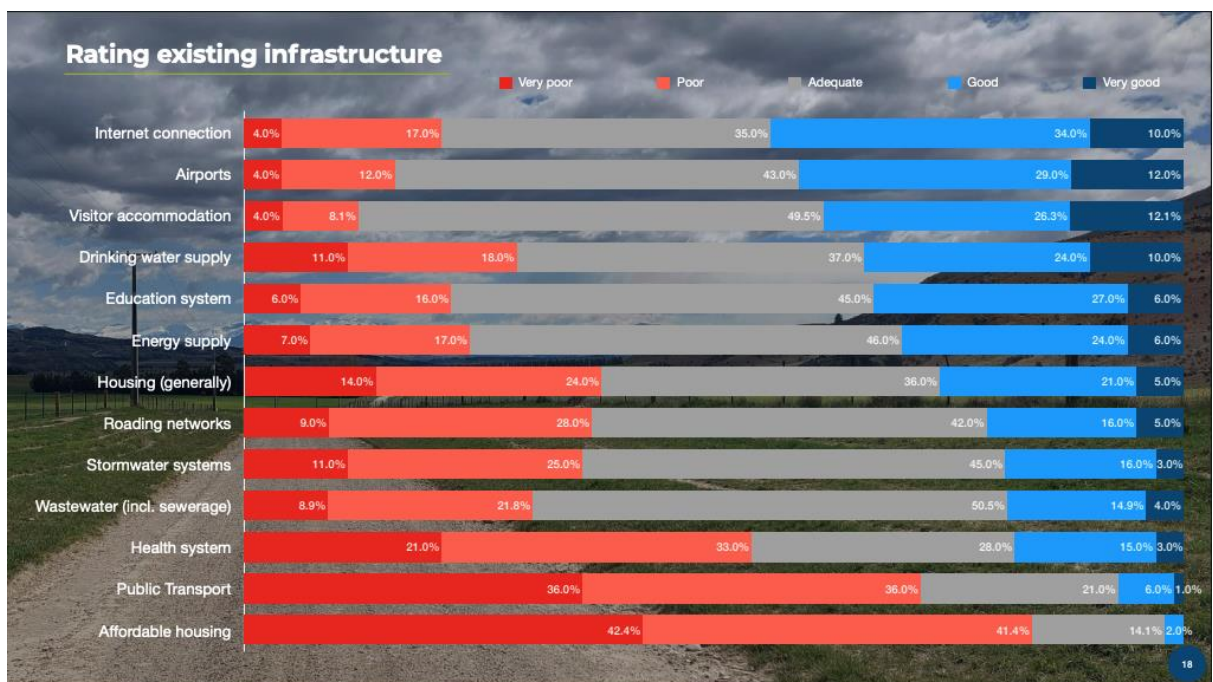
infrastructure and growth, tourism, and air travel. The survey was conducted in late 2023 and received 302 valid responses. The study covers both Queenstown Lakes and Central Otago districts. Statistics New Zealand divides these districts into eight wards and divides the wards into 414 'Statistics Areas (SA1). Thirty-three SA1s were randomly selected across Central Otago to ensure representation from within each ward. The sampled population from each ward was proportional to the total population. The sample closely reflects the gender, age, income, and geographic distribution of the combined Central Otago and Queenstown Lakes districts, providing a strong basis for analysis.

21. Data collection took place in October-November 2023. The study included a combination of quantitative (closed) and qualitative (open) response questions that addressed five topics: Central Otago lifestyle, climate change, infrastructure and growth, tourism, and air travel and airports, providing insights of direct relevance to the current proposal.
22. The results were consistent across all parts of the region. The survey revealed that the qualities of life that residents most valued were derived from 'Landscapes' and undisturbed 'Natural beauty'. Survey participants described the importance of stunning open spaces, distinctive schist landscapes, mountains, lakes, blue skies and beautiful scenery.
23. Peacefulness, natural beauty and awe-inspiring landscapes were common responses. Undisturbed 'Natural beauty' was described as the largely untamed nature of Central Otago particularly including elements of naturalness, peacefulness, tranquillity, a sense of remoteness, open spaces, dark skies, mountain air and the inspiring natural environment.
24. Leisure and recreational values associated with unique landscapes were central to quality of life. Conversely, "work opportunities" ranked second to lowest of 18 categories, with over two thirds of respondents regarding this of very low or low importance, or neutral. By contrast, "undisturbed natural landscapes" were regarded as important by 86%, with nearly two thirds ranking it "very high importance".
25. Also of relevance is that 68.3% regarded "dark skies at night" as fairly important or of very high importance. And only 1% were not concerned (and 6% "fairly unconcerned") about "human impact on the environment".





26. The study also highlighted affordable housing as a real issue for the region, with 83.8% rating this a “very poor” or “poor” in the region.



27. These results from the Central Otago Residents Study in relation to landscapes and lifestyle also align with CODC data from recent work on a 50-year vision for the district. In this study, 99% of residents in the CODC district agree that access to a healthy natural environment for leisure and recreation is key to living here. This is second only to "feeling safe and secure" (Angus & Associates, 2024).

28. This led to the following statement by CODC as part of its 50-year vision called *Central Otago – Our Place in the World*: “The state of wellbeing in Central Otago is grounded in respect for and protection of the natural environment. This is the foundation upon which all else depends. While the productive capacity of the natural environment is a core driver of economic prosperity, the recreational and aesthetic value of a healthy natural environment is also valued as fundamental to well-being and the way of life in Central Otago.”

29. The vision document, endorsed by CODC in April 2025, went on to describe the purpose of the document: “This vision will now help guide Council’s priorities and inform discussions with Central Government, and other entities that influence this place, to shape longer term decisions in ways that deliver the best possible outcomes for the people and places of Central Otago. It has already been used to inform Council’s Community Outcomes in the 2025-2034 Long-term plan and the 2025 Economic Development Strategy.” (CODC, 2025)

Compatibility with Destination Management Plans, vision documents and Economic Development Strategies

30. Our 2024 Central Otago Resident Opinion Study also reflects current regional Destination Management Plans.

31. The 2022 Central Otago Destination Management Plan is a strategic framework to guide the sustainable growth of tourism. It was commissioned by the Central Otago District Council and developed collaboratively with stakeholders including Kāi Tahu, local communities and industry, and informed by extensive qualitative and quantitative community research, designed to capture residents’ views about tourism and their aspirations for the future of the region. This approach aimed to ensure that the perspectives of Central Otago’s diverse population, including rural residents, business owners, seasonal workers, and mana whenua, were considered in shaping the strategy.

32. Local communities in Central Otago identified several key priorities during consultation. Consistent with the findings of our subsequent resident survey, these priorities included:

- a. **Protection of the natural environment and landscapes:** Residents strongly valued Central Otago’s open spaces and recreational opportunities and wanted tourism to develop in ways that preserve these natural assets for future generations.
- b. **Maintaining the character of small towns and strong community identity:** Locals wanted tourism to respect the region’s rural lifestyle and heritage while ensuring that community wellbeing remained central to decision-making
- c. **Manage growth carefully:** To protect the region’s unique character, particularly regarding housing affordability, infrastructure pressure, and population growth. This reflects concerns that rapid growth negatively affects residents’ quality of life.

33. Similarly the Queenstown Lakes Destination Management Plan ‘Travel to a Thriving Future’ was developed through two years of engagement with residents, businesses, iwi and other stakeholders, during which feedback was sought on the impacts of tourism and the future direction of the visitor economy. This consultation helped shape the plan’s goals, including the shift toward ‘regenerative tourism and a carbon-zero visitor economy by 2030’ (Regenerative Tourism NZ, 2023).

34. Community perspectives were incorporated through collaboration between organisations such as Destination Queenstown, Lake Wānaka Tourism, and the Queenstown Lakes District Council, with significant input from Ngāi Tahu and community groups.

35. This consultation process revealed several priorities for the future of tourism which centred on ensuring tourism benefits residents while protecting the environment and strengthening the local economy. Specifically:

- a. **Tourism should contribute to a “thriving future” for the district:** delivering economic, social, cultural, and environmental value rather than simply increasing visitor numbers.

- b. **Not only protecting but also restoring the natural environment:** Residents wanted tourism to reduce its environmental impact and move toward a carbon-zero visitor economy by 2030, reflecting strong concern for climate change and environmental sustainability.
 - c. **Enriching local communities and improving resident wellbeing:** Protecting local identity, supporting arts and culture, telling authentic local stories, and ensuring tourism enhances residents' quality of life rather than creating negative impacts.
 - d. **Building a resilient and productive visitor economy:** Supporting strong local businesses, jobs, and workforce capability while reducing over-reliance on tourism by diversifying the economy in ways that are compatible with community values.
36. The *Queenstown Lakes Spatial Plan (2023)* was informed by a public consultation process that involved extensive engagement with local communities over several years and resulted in key priorities for how the district should grow to 2050. Consultation occurred between 2018 and 2021 and included early discussions with community members, businesses, iwi, and government partners through the 'Whaiora Grow Well Partnership'.
37. This informed an initial vision for the plan. A district-wide workshop roadshow in November 2019 was held in seven locations and co-hosted with local resident associations and community groups, allowing residents to discuss growth challenges and provide input into planning scenarios. Following this early engagement, a draft Spatial Plan was released for formal public consultation from 19 March to 19 April 2021.
38. Community members could submit written feedback, which was then reviewed in hearings held in May 2021. Recommended changes from the hearings panel were incorporated into the final plan adopted by the council in July 2021. (Queenstown Lakes District Council, 2023).
39. Key outcomes of the consultation included a shared vision to "Grow Well" (Whaiora) by managing population growth sustainably, improving housing, prioritising public transport and active travel, supporting a sustainable tourism system, and developing well-designed neighbourhoods with a diverse local economy. These priorities reflect community aspirations for sustainable growth, environmental protection, and improved liveability in the Queenstown Lakes District.
40. There is significant potential for open cast gold mining to be inconsistent with the outcomes that the Destination Management Plans and Spatial Plan seek for Central Otago. These are outcomes that reflect shared community values.
41. The tenets of the Central Otago economic development and Queenstown Lakes economic diversification plans focus on niche business sectors that complement and derive value from the region's unique qualities. As such, there is also significant risk of incompatibility between the proposed mine and the regional identity underpinning these development strategies' goals.
42. The primacy of the unique Central Otago landscape is also evident in the *Central Otago Economic Development Strategy 2025-2035*. This strategy is informed by community consultation conducted in 2024 that shaped the 'District Vision: Central Otago - Our Place in the World' (mentioned briefly in the previous section). The Strategy sets a single target, which is to increase the district's average wage to match the national average by 2035. It describes Central Otago as a region defined by its stunning landscapes, strong sense of community, and vibrant culture; and as a place where people value connection, opportunity and the unique identity of the district, and cautions that "Increasing economic

prosperity will depend on how fully Central Otago embodies and champions our World of Difference regional identity values”.

43. The regional identity values are about inspiring and leading others with “our special point of difference” and protecting and celebrating Central Otago’s rich heritage in landscapes, architecture, flora and fauna and different cultural origins.
44. One of the drivers for the Strategy (“Why Act?”) is that the region is “on the cusp of significant large-scale projects and transitions”. The Bendigo Goldmine is identified as one of several large projects that represent a transformative opportunity but with the caution that “these developments, should they proceed, have the potential to drive substantial growth, but careful consideration and management is essential to deliver long-term, sustainable benefits.
45. The Queenstown Lakes District Council’s ‘Diversifying our Economy’ plan aims to build a resilient, sustainable, and diversified local economy that offers a broader range of career and income opportunities beyond tourism and construction. It focuses on supporting existing businesses, identifying and growing niche sectors such as tourism technology, film, and remote work, and fostering a business environment that attracts innovation and high-value jobs. The approach encourages collaboration with local partners, promotes economic resilience against future shocks, and seeks to ensure future generations can live and work in the district with fulfilling career paths while protecting the landscapes and lifestyles that are important to residents.

Risks to New Zealand’s and Central Otago’s tourism destination image

46. New Zealand’s ‘100% Pure’ global marketing brand is dependent on the image of unique and untouched landscape and experiences of undisturbed nature. This global branding initiative has been the subject of international research that highlights the effectiveness of Tourism New Zealand showcasing unique and diverse landscapes, people, culture and tourism activities¹.
47. On 30 July 2024 Tourism New Zealand marked 25 years of the 100% Pure New Zealand brand, describing it as “one of the world’s most admired and longest-running destination tourism campaigns”. The Chief Executive claimed that the sustained success of “100% Pure New Zealand was due to the fact that it “...embodied Aotearoa New Zealand’s spirit of adventure, spectacular scenery, and our rich culture” (Tourism New Zealand, 2024).
48. Protecting unique landscapes and natural environments is critical to the success and credibility of the ‘100% Pure New Zealand tourism campaign’. New Zealand’s international tourism appeal is strongly based on images of pristine landscapes and unspoiled nature.
49. In the Q&S following her opening address to the 2026 Otago Tourism Policy School on Thursday 26th March 2026, Tourism and Hospitality Minister Hon. Louise Upston reinforced this when she remarked “I think it is important that many of our international visitors come to New Zealand because of our environment; we have to protect that.” In her address, the Minister had remarked that “the latest Tourism Satellite Account shows one in nine jobs are now supported by tourism and hospitality - a clear signal of the sector’s importance to employment and regional prosperity.”²

¹ Morgan, N., Pritchard, A., & Piggott, R. (2002). New Zealand, 100% pure. The creation of a powerful niche destination brand. *Journal of Brand Management*, 9(4), 335-354.

² <https://www.beehive.govt.nz/speech/opening-remarks-otago-tourism-policy-school>

50. A report by the Parliamentary Commissioner for the Environment (2021) titled 'Not 100% – but four steps closer to sustainable tourism', explains that the marketing campaign has been extremely successful in attracting visitors by promoting New Zealand as a clean, green destination with spectacular scenery and wilderness experiences.
51. It also notes that this branding also creates high expectations among visitors that they will experience a relatively pristine environment, remote wilderness, and native wildlife. The report highlights that tourism relies heavily on natural resources such as landscapes, biodiversity, and quiet natural places. Protecting these environmental assets is therefore essential to maintaining the attractiveness of New Zealand as a destination and sustaining the tourism industry long term.
52. If environmental degradation occurs—such as pollution, overcrowding at iconic sites, or damage to landscapes - it risks undermining the credibility of the brand and New Zealand's global reputation (Tourism New Zealand, 2021). Safeguarding the environment is not only an ecological responsibility but also fundamental to protecting the authenticity and economic value of the '100% Pure New Zealand' brand (RNZ, 2018).
53. The Central Otago and the Queenstown Lakes landscapes are an integral part of New Zealand's 100% Pure international brand and Tourism New Zealand's regional tourism marketing campaigns. This is particularly evident in Tourism New Zealand 2025 'Find your 100% Pure New Zealand' campaign which while based on New Zealand's landscapes and landmarks promotes the claim that "There truly is something for everyone, whether that's adventure seeking thrills, finding - total rejuvenation in nature, or enjoying our world-class culinary scene" (RNZ, 2025).

Reputational risks

54. The reputational risks associated with mining impacts that may be perceived as destroying unique landscapes, and the storage of very large volumes of toxic waste in perpetuity with risks to lakes and rivers, are significant and extend beyond the '100% Pure New Zealand' brand. The potential human health impacts associated with mining are a reputational risk to tourism but also a wide range of other industries such as the wine industry and creative/film industries.
55. Reputational risks include not only risks the "100% Pure New Zealand" brand via environmental damage. Tourism destinations have also been associated with reputational risks through association with impacts to the health of local communities, local population, and media coverage over time of these impacts.
56. There is growing popular awareness (or perception) of the potential health impacts of mining, due to the publication of studies on mining's public health impacts. These include studies indicating that "mining activities pose long term health risks to surrounding communities through exposure to toxic pollutants such as heavy metals, airborne particulates, and contaminated water sources" (Leuenberger et al., 2021; Satria, 2023), a recent meta study of health impacts of mining in Australia (Cortes-Ramirez, et al., 2025) which highlights the public health outcomes commonly associated with different forms of mining, and a paper by Jain and Kaushik (2026) which identifies key health determinants of mining that cause higher disease prevalence and mental stress in mining regions compared to non-mining regions. This perception means there is a potential for reputational risks regardless of the specific impacts of a particular mining project.

Rural character and amenity values

57. Central Otago and Queenstown Lakes are key New Zealand tourism assets. Their tourism success is built on landscape and amenity values that are of importance to local communities. Central Otago residents value the rural character and regional qualities of their communities. Impacts on rural character and amenity values are likely to have flow-on effects for regional identity and tourism.

Visual impacts

58. The visual impacts of the proposed mine on people viewing it from air and surface transportation are also relevant to regional identity and tourism. The physical impacts of open cast mining, in this case, are not only irreversible but will also be highly visible along tourist mobility corridors as described in Ms Gilbert's landscape assessment. The route between Wānaka and Cromwell is a key tourism road corridor.

59. The route between the Red Bridge at Luggate and Tarras is also a key tourism road corridor, for those travelling towards Christchurch from the Upper Clutha.

60. I am advised by Ms Gilbert that the visual simulations that Boffa Miskell has prepared do not consider views from the air. It appears that for those flying into Queenstown on commercial aircraft, the mine site (all open pits, processing plant, waste rock dumps and the tailings dam) will be frequently and easily seen on the flight path on descent into Queenstown. When runway 23 is in use (which is frequently the case) air traffic from Auckland, Wellington and Christchurch join an approach which includes passing over the Pisa Range (on the Eastern side) at approximately 10,000 feet ASL (See Figure 1). Passengers on the left-hand side of the plane have a view out the window to the Dunstan Range and Maniototo (see Figure 2, which uses an image taken from one such flight). This is at a distance of 15km from the mine site.

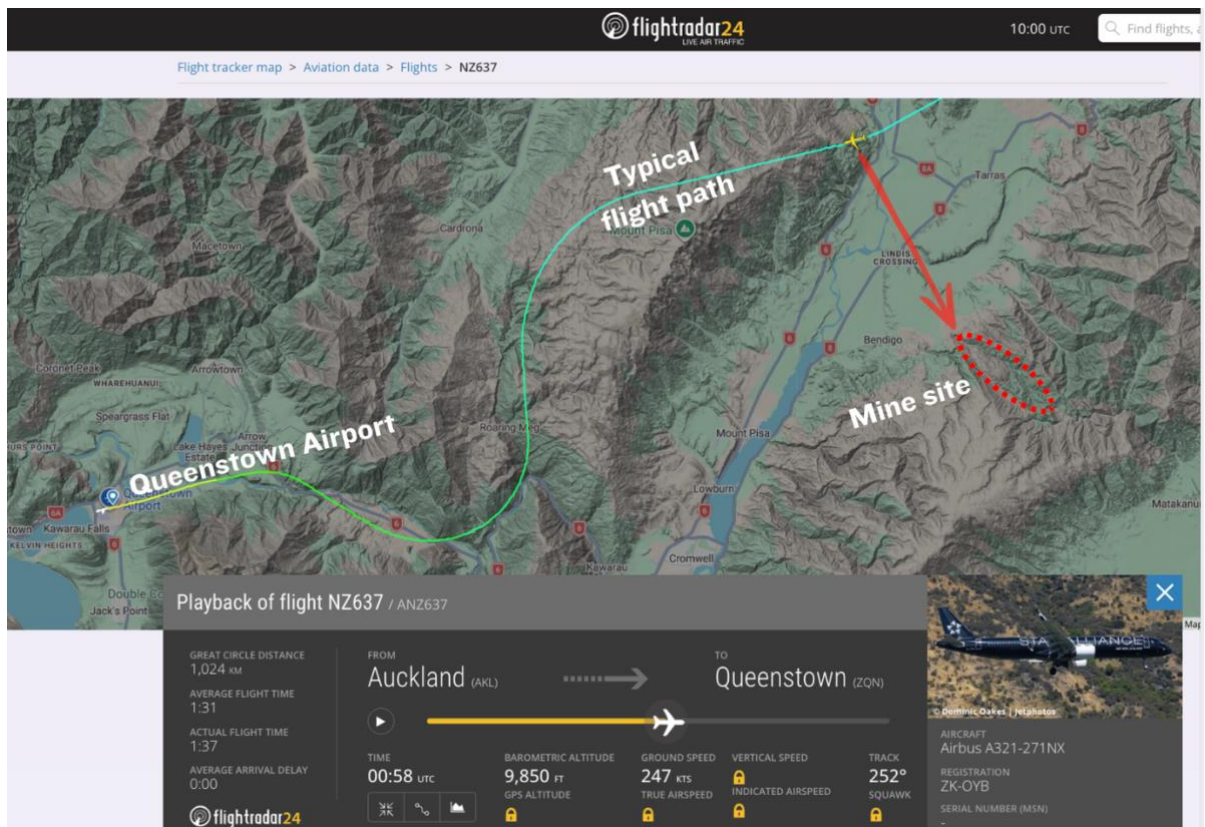


Figure 1. The actual flight path into Queenstown when Runway 23 is in operation - this was taken from FlightRadar at 13:58 NZDT, Monday 22nd March 2026, showing an Air New Zealand A320 flight NZ637 from Auckland approaching ZQN on the normal commercial approach for Runway 23 (with the subsequent flight path also shown, which is also the flight path taken by other jets flying in from this direction). The mine site is indicated by the red dotted oval and arrow from the plane. Similar data can be seen frequently on FlightRadar when Runway 23 is in use.

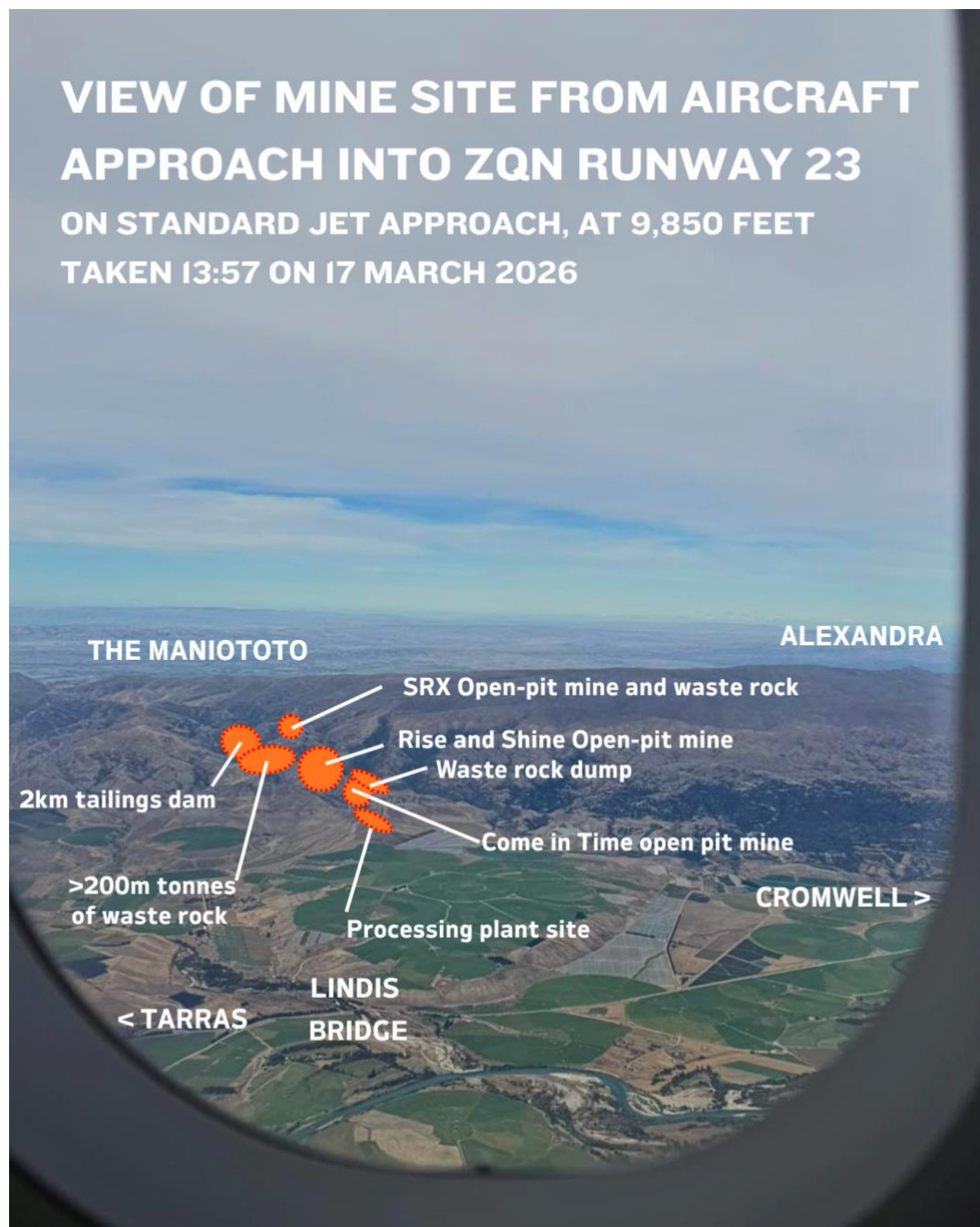


Figure 2. A photo taken from the left hand window seat of an Air NZ A320 domestic jet flying to Queenstown – standard jet approach (the same approach indicated in Figure 1), at 9,850 feet, taken 13:58 on 17 March 2026. This photo was taken with a mobile phone – the window frame seen in this shot is in the original photo. The location of almost all key elements of the proposed mine can be clearly seen from this vantage point. Approximate locations of each element indicated by orange shapes. The Maniototo Region in the background behind the Dunstan Mountains, the location of Alexandra indicated, with arrows pointing toward Tarras (just out of shot) and Cromwell (approx. 15km out of shot). The Lindis one-way Bridge at the end of Ardgour Road is in the foreground.

Impact on tourism industry and tourism-related sectors

Agriculture and viticulture

61. Open cast mining does not fit within the context of the existing sustainable business approaches of local vineyards including strong reputation for organic production which relies on the natural beauty and reputation for sustainable food and wine production that attracts visitors to Central Otago, and that also attracts people to buy produce from the area.
62. Academic literature on wine tourism confirms the importance of wine in regional brand marketing, contributing to unique 'sense of place', and fostering strong and ensuring consumer links between sensory experiences and wine regions as tourist destinations³.

Outdoor and events industries

63. Many other industries also depend on unique landscapes and natural beauty. They include outdoor recreation and landscape-based industries (e.g., snow sports, walking/hiking, fishing, hunting, scenic flights industry), and the events industry (e.g., events using high country landscapes such as Hāwea Epic mountain biking event; Northburn 100 which takes place in the Dunstan Mountains; ultra-sports events similar to Red Bull Defiance - which has included courses on the Pisa Range – Godzone and Spirited Women Adventure Races).

Creative sectors such as the film industry

64. Major Tourism New Zealand marketing campaigns have been based on unique landscapes depicted in the Lord of the Rings and Hobbit movies, and New Zealand is well known as a destination for epic film scenes, involving our stunning and rugged vistas, for a range of movies. These have included many made in and around Central Otago and the Maniototo. The influence of movies on destination awareness and place promotion arises from strong connections between movies, location placement and place imaging⁴
65. **The proposed mine will impact emerging and future tourism industries:** Cycle trails and walking trails (e.g., Te Araroa) are developing rapidly in the region. Trail developments such as the recent Lake Dunstan Trail and Coronet Peak Loop have exceeded forecast demand. New trails are associated with significant tourism and service business developments. New business opportunities are expected with the Kawarau Gorge and Roxburgh Gorge trail completions.
66. I have read the statement of Jonathan Kennett regarding impacts of the proposed mine on the cycling network experience. Experiences of unique landscapes of high conservation value are worthy of protection in their own right. The natural landscape and heritage values of the Dunstan Mountains offer significant active and adventure tourism potential if the environment remains largely undisturbed in its natural state. However in terms of cycle network development and regional tourism interests, I would emphasise the importance of the iconic Thomsons Gorge trail as a connector between the Queenstown Lakes and Central Otago trail networks.

³ Esau, D., & Senese, D. M. (2022). The sensory experience of wine tourism: Creating memorable associations with a wine destination. *Food Quality and Preference*, 101, 104635.

⁴ <https://www.filmquest.co>

67. Dark skies is also a growing focus of tourism on trails such as Te Araroa. The impacts of light pollution from the Bendigo Mine will have implications for night sky experiences in both the Manuherikia and Bendigo/Upper Clutha areas.
68. I have read the statement of Dr Brian J Boyle regarding impacts of Santana’s proposed mine on the Tarras-Bendigo night sky. Boyle states that “open-cut mines operating at night cannot be consistent with a dark sky”. The night sky is a tourism asset that should be protected given its experiential value use in interpretation and education (including indigenous calendar, navigation and storytelling) on South Island hiking and cycle trails including Ta Araroa and the Central Otago Rail Trail. It is noted that currently “Te Araroa trail hikers experience some of the most exceptional, low-light pollution night skies in the world, particularly when passing through the South Island’s mountainous regions”. This is an aspect of tourism that is recognised and highly valued in the Aoraki Mackenzie International Dark Sky Reserve and should be protected as a tourism asset.

Examples of impact of environmental risks on tourism

69. The environmental impacts of mining can have direct negative impacts on destination image, long-term reputational damage and reduced visitor arrivals with consequences for all tourism businesses.
70. The following are examples from around the world where the introduction of mining has had an impact on tourism or has threatened to do so. These examples are footnoted, should you wish to review reports, scientific analysis or media directly. Please note that I have not included these footnotes again in the “references” section at the end of this document.

International examples of mining activities impacting (or proposed mines risking impacts) on tourism and related activities – as reported in the media or other reports and studies.

71. **Mount Polley Tailings Dam Failure, British Columbia, Canada (2014).** A gold mine tailings dam collapse – Canada’s worst mining disaster ever - released 24 million cubic metres of mining waste into Quesnel Lake,⁵ a major sport-fishing and wilderness tourism destination. Experts estimate that it could take decades “or even a century for the bottom of the lake to return to some normality.”⁶ Impacts on local communities and tourism operators were widely reported. Over ten years later, toxins are still in the lake and concentrations of metals are being detected getting into the food chain in the local ecosystem.⁷
72. **Taseko Mines' Prosperity/New Prosperity Gold-Copper Project, British Columbia, Canada (Rejected 2010, 2014).** This proposed open-pit mine near Williams Lake was rejected twice by federal environmental review panels, partly because it would have “caused irreparable damage” to Fish Lake (Teztan Biny), a sacred site for the Tsilhqot'in Nation and an important fishing and wilderness tourism destination.⁸ The panels concluded that significant adverse environmental effects—including the complete destruction of a natural lake used for recreation and cultural purposes—could not be justified, even with mitigation

⁵ <https://www2.gov.bc.ca/gov/content/environment/air-land-water/spills-environmental-emergencies/spill-incidents/past-spill-incidents/mt-polley>

⁶ Ellen Petticrew, research chair with the Quesnel River Research Centre and professor of geography at the University of Northern British Columbia quoted in <https://thenarwhal.ca/mount-polley-mine-reopens/>

⁷ <https://www.cbc.ca/news/canada/british-columbia/mount-polley-mine-dam-collapse-toxic-impact-quesnel-lake-1.7411472>

⁸ <https://www.cbc.ca/news/canada/british-columbia/taseko-new-prosperity-mine-at-fish-lake-rejected-again-1.2553002>

measures.⁹ The case demonstrates regulatory protection of tourism and cultural values over extractive development.

73. **Ok Tedi Mine (1982–2000s), Papua New Guinea.** This copper and gold operation discharged approximately 80,000 tonnes of tailings into the Ok Tedi and Fly Rivers over two decades, causing sediment contamination that killed forests and fish across more than 1,000 kilometres of river system. Scientific studies found the large amounts of contaminated sediments have changed the river's ecosystem, with severe loss of fish, reports of death to riverside rainforests and areas along the river's considerable flood plain.¹⁰ The ecological collapse directly destroyed river-based ecotourism and fishing tourism, making this a case study in irreversible reputational and environmental damage to a tourism-dependent region.
74. **Bird in Hand / Terramin Gold Mine, Adelaide Hills, Australia.** This proposed gold mine in a wine-tourism region was rejected because regulators determined that short-term mining benefits did not outweigh risks to long-term local businesses, water sources, and the region's tourism brand.¹¹ The decision prioritised the sustainability of established tourism industries over extractive development.
75. **Great Barrier Reef Region, Australia, Coal Mining and Port Expansion.** Coal-related development and shipping expansion near the Great Barrier Reef generated sustained concern from tourism stakeholders and environmental groups. In February 2023, Australia rejected a major coal project partly because association with extractive expansion threatened the reef's global brand identity, demonstrating that tourism damage can occur through perceived risk alone, even before direct environmental impact.¹²
76. **McArthur River Mine, Northern Territory, Australia.** This zinc-lead mine in the Gulf of Carpentaria region has been associated with significant environmental contamination including heavy metal pollution in the McArthur River system. Research has documented concern from Traditional Owners and environmental groups about damage to fishing grounds and coastal ecosystems that support both Indigenous cultural practices and emerging tourism ventures in remote Northern Territory, where nature-based and cultural tourism represent key development pathways.¹³
77. **Kuusamo / Ruka, Finland: Proposed Gold Mine.** A proposed gold mine beside this major ski and nature-tourism destination became a textbook mining–tourism conflict because the region's visitor economy depends on a clean-environment brand and landscape quality. Research found that mining would conflict fundamentally with the area's nature-tourism positioning.¹⁴
78. **Ylläs / Hannukainen Iron Mine Proposal, Finnish Lapland, Finland.** Research on this proposal found that most respondents believed a mine would weaken Ylläs's image as a nature destination, with strong opposition from tourism entrepreneurs in the ski-resort area.¹⁵ The case exemplifies how industrial development threatens destinations whose competitive advantage rests on pristine natural imagery.

⁹ See original panel decision: <https://www.ceaa-acee.gc.ca/050/documents/p63928/83594E.pdf>

¹⁰ <https://onlinelibrary.wiley.com/doi/abs/10.1111/1467-8330.00075>

¹¹ <https://wbmonline.com.au/court-upholds-bird-in-hand-gold-mine-decision/>

¹² <https://www.sbs.com.au/news/article/coal-mine-10km-from-great-barrier-reef-rejected-in-australian-first/uisc4kd4e>

¹³ <https://www.sciencedirect.com/science/article/pii/S2214790X24001588>

¹⁴ <https://www.sciencedirect.com/science/article/abs/pii/S0264837715302817>

¹⁵ <https://www.mdpi.com/2079-9276/11/12/109>

79. **Roşia Montană, Romania: Proposed Open-Cast Gold Mine.** This long-contested project threatened a historic cultural landscape of ancient Roman galleries, churches, and historic houses with open-cast mining development. UNESCO's later World Heritage listing reinforced that the area's strongest long-term identity was heritage preservation, not mineral extraction, making mining fundamentally incompatible with the region's tourism and cultural value.¹⁶
80. **Jadar Valley, Serbia, Rio Tinto Proposed Lithium Mine.** Reuters documented sustained public protests over this proposed lithium project, framed around fears of environmental damage to a productive rural valley and agricultural landscape.¹⁷ The conflict represents a direct contest between mining and rural-tourism identity, with the valley's image being contested between farming and industrial extraction.
81. **Mapungubwe World Heritage Site, South Africa: Mining Pressure and Vele Coal Mine Proposal.** Research on Mapungubwe found that mining pressure was affecting a tourism asset of major heritage value, with concern for local sustainability and long-term tourism growth. A separate proposal for a coal mine in the area raised concerns that increased pollution and landscape damage could harm this premier wildlife-tourism region's heritage brand.¹⁸
82. **Xolobeni Titanium Mining Project, Wild Coast, Eastern Cape, South Africa (Rejected 2021).** This proposed dune mining project in the Xolobeni area of the Wild Coast faced sustained opposition from local communities and environmental groups who argued it would destroy beaches, coastal forests, and marine ecosystems critical to the region's growing eco-tourism economy. In 2021, the Minister of Mineral Resources rejected the mining application, citing community opposition and environmental concerns. The Wild Coast is marketed as an unspoiled coastal wilderness destination, and the decision reflected recognition that mining would fundamentally undermine the region's tourism potential and natural capital.¹⁹
83. **Songkhla Province, Thailand: Limestone Mining.** A peer-reviewed study found that unsustainable limestone quarrying was a significant obstacle to tourism and community-based tourism development in the affected mountain area.²⁰ The research identified mining as directly incompatible with the region's tourism potential and community economic sustainability.
84. **Raja Ampat, Nickel Mining, Indonesia.** Nickel mining operations in one of the world's best-known dive destinations triggered environmental protests and government action. Indonesia suspended and then revoked multiple mining permits amid concern for reefs, biodiversity, and the area's critical tourism value, demonstrating direct government intervention to protect tourism assets.²¹
85. **Bangka-Belitung Islands, Indonesia: Tin Mining.** Offshore tin mining around these Indonesian islands—popular beach and diving destinations—has caused documented seabed destruction, coral damage, and coastal erosion. Research and media reports have

¹⁶ <https://www.tandfonline.com/doi/abs/10.1080/17567505.2017.1291593>

¹⁷ <https://www.bbc.com/news/articles/cged9qgwrvyo>

¹⁸

https://www.researchgate.net/publication/319048853_Exploring_the_Impacts_of_Mining_on_Tourism_Growth_and_Local_Sustainability_The_Case_of_Mapungubwe_Heritage_Site_Limpopo_South_Africa_The_Case_of_the_Mapungubwe_Heritage_Site_Limpopo_South_Africa

¹⁹ <https://theconversation.com/why-south-african-communities-win-against-mining-company-matters-107746>

²⁰ https://www.ajhtl.com/uploads/7/1/6/3/7163688/article_42_vol_9_2_2020_thailand.pdf

²¹ <https://www.stuff.co.nz/travel/360719140/indonesia-stops-nickel-mining-operations-top-tourist-diving-destination>

highlighted conflicts between the tin industry and tourism operators, with dive sites and beaches degraded by sediment plumes and dredging activity. The islands' tourism economy, which depends on clear waters and intact marine ecosystems, has been directly compromised by decades of extractive activity.²²

86. **Milos Island, Greece: Active and Legacy Mining.** Academic work on Milos explicitly describes conflicts in the marketing of the island as a tourism destination, while research highlights the visual impact of abandoned mines on tourism appeal.²³ Active and historical mining operations create a textbook destination-image problem for an island economy dependent on tourist visits.
87. **Skouries Gold Mine, Halkidiki Peninsula, Greece.** This proposed gold mining project in Halkidiki, a region known for beaches, forests, and tourism, has faced years of local opposition and protests.²⁴ Residents and tourism operators have argued that open-pit mining and associated infrastructure would damage the area's natural beauty, water resources, and tourism brand. Studies have documented concern that industrial mining activity is incompatible with Halkidiki's identity as a Mediterranean tourism destination, and conflicts have included legal challenges and civil unrest.
88. **Nazca Region, Mining Risk around Nazca Lines Protected Area, Peru.** Reuters reported that Peru restored protective zoning around the Nazca Lines after public backlash over concerns that reduced protection could expose the UNESCO World Heritage site to mining-related risks²⁵. For a world-famous heritage destination, even the perception that mining could approach the site is sufficient to create reputational damage.
89. **Conga Gold-Copper Project, Cajamarca Region, Peru (Suspended 2011).** This proposed mine in Peru's northern highlands was suspended indefinitely after massive protests, partly because it threatened water sources in an agricultural and emerging tourism region.²⁶ Local communities and environmental groups argued the project would drain or contaminate mountain lagoons (lagunas) that are both culturally significant and important for rural tourism and trekking. The conflict became a national crisis, and the government ultimately prioritized water security and community opposition over mining development, illustrating how tourism and agricultural livelihoods can override extractive projects.
90. **Okapi Wildlife Reserve, Democratic Republic of Congo, Gold Mining.** Chinese-operated gold mining threatened this UNESCO-listed wildlife reserve through deforestation, pollution, and wildlife decline.²⁷ In a location whose global identity depends on protected biodiversity and conservation, mining directly undermines visitor appeal and conservation image.
91. **Atacama Region, Chile: Lithium Extraction on Salt Flats.** Mining-linked pressure on flamingo habitat in the Atacama and broader threats to water, culture, and landscapes in

²² Putra et al. (2018), *Human activities and persistent coral reef degradation in Gaspar Strait, Bangka Belitung Islands, Indonesia*, F1000Research, <https://f1000research.com/articles/7-1962> — and the *Gecko Project* investigation at <https://thegeckoproject.org/articles/illegal-tin-mining/>.

²³

https://www.researchgate.net/publication/248944378_Mining_and_tourism_Conflicts_in_the_marketing_of_Milos_Island_as_a_tourism_destination

²⁴ <https://www.sciencedirect.com/science/article/pii/S0301420724006597>

²⁵ <https://www.reuters.com/business/environment/peru-restores-nazca-lines-protection-after-backlash-over-mining-risk-2025-06-08/>

²⁶ <https://www.ussif.org/research/case-studies/newmont-mining-and-conga-project-case-study-and>

<https://www.reuters.com/article/us-peru-mining-idUSBRE8B70LD20121208>

²⁷ <https://www.asahi.com/ajw/articles/15543803>

the lithium triangle have generated concern.²⁸ Because the Atacama is marketed globally as a fragile, otherworldly desert-nature destination, ecological controversy associated with lithium mining can undermine the region's image for international visitors.

92. **Cockpit Country / Blue Mountains, Jamaica: Bauxite Exploration and Mining Pressure.** Jamaica moved to protect Cockpit Country from mining, determining the area too valuable to sacrifice.²⁹ Given Jamaica's strategic effort to grow nature-based tourism beyond all-inclusive resort economics, mining pressure in such landscapes creates an obvious brand and economic conflict.
93. **Goa, India: Iron Ore Mining and Illegal Mining Controversies.** India's Supreme Court quashed Goa iron ore mining permits amid environmental and social concerns.³⁰ Goa's economy is strongly tied to beaches, heritage, and tourism, so heavy association with illegal or environmentally damaging mining has long sat uneasily beside its visitor brand.
94. **Niyamgiri Hills, Odisha, India: Vedanta Bauxite Mine (Rejected 2010–2014).** The proposed bauxite mine in the Niyamgiri Hills was rejected after the Supreme Court of India upheld the rights of the Dongria Kondh tribal community to protect their sacred mountain.³¹ While primarily a case of Indigenous rights and environmental protection, the Niyamgiri region also holds potential for eco-tourism and cultural tourism, and the decision recognized that the mountain's cultural and ecological integrity had greater long-term value than short-term mineral extraction. The case is cited internationally as an example of communities successfully defending landscapes with tourism and cultural value against mining.
95. **Eastern Highlands and Protected Mountain Areas, Zimbabwe: Illegal Gold Mining.** Reuters reported a pandemic-era illegal gold rush in Zimbabwe's mountains and documented concerns about mining licences in national parks.³² In scenic mountain and protected-area settings, mining activity quickly damages the region's visual and eco-tourism image.
96. **Bristol Bay, Alaska, United States of America: Pebble Copper-Gold Mine (Proposed).** Bristol Bay is internationally associated with salmon, wildlife, fishing, parks, and wilderness. The proposed Pebble mine was widely framed as clashing with the region's core visitor identity, and the project became controversial precisely because it threatened the salmon economy and wildlife brand that define the region's tourism appeal.³³
97. **Black Hills, South Dakota, United States of America: Renewed Gold Mining Proposals.** Renewed gold-mining proposals have drawn sustained opposition partly because of feared damage to landscapes, ecosystems, and the Black Hills' tourism appeal in a region where tourism is a major land use and economic driver.³⁴ Local tourism interests have mobilized against extraction projects perceived as threatening the region's natural brand.
98. **Twin Metals Minnesota Copper-Nickel Mine, Boundary Waters, Minnesota, United States of America (Rejected 2022).** The proposed Twin Metals mine near the Boundary Waters Canoe Area Wilderness - one of America's most visited wilderness areas— - blocked by the Biden administration in 2022 after sustained opposition from tourism operators,

²⁸ <https://www.reuters.com/world/americas/chiles-atacama-lithium-mining-stirs-fight-over-flamingos-2022-05-19/>

²⁹ <https://edgeeffects.net/cockpit-country-mining-conservation/>

³⁰ <https://india.mongabay.com/2018/02/uncertainty-continues-in-go-over-mining-judgment/>

³¹ <https://www.theguardian.com/global-development/poverty-matters/2014/jan/14/india-rejection-vedanta-mine-victory-tribal-rights>

³² <https://www.reuters.com/world/pandemic-spurs-illegal-gold-rush-zimbabwe-mountains--trfn-2020-10-12/>

³³ Final determination here: <https://www.epa.gov/bristolbay/final-determination-pebble-deposit-area>

³⁴ <https://www.cbsnews.com/news/gold-mines-black-hills-south-dakota-controversy/>

environmental groups, and recreationists.³⁵ Research and economic analyses demonstrated that the region's wilderness tourism and recreation economy generated more jobs and revenue than the proposed mine would, and that mining posed unacceptable risks to water quality in a landscape whose value depends entirely on pristine lakes and forests. The decision was explicitly framed around protecting an established tourism economy from extractive risk.

99. **Fiji and Pacific Island Seabed Mining (Proposed).** A peer-reviewed study on Fiji found that divers' perceptions of deep-sea mining could materially change travel decisions and "severely impact" Fiji's tourism economy.³⁶ The Fiji research is part of a wider pattern in which destinations dependent on diving, marine recreation, and pristine-ocean branding face tourism risk from mining perception alone, before extraction even begins, because visitor behaviour can be altered by environmental concern and reputational association.
100. **Palawan Island, Philippines: Nickel Mining and Protected Areas.** Palawan, often called the Philippines' "last ecological frontier," is a premier eco-tourism and diving destination. Nickel mining operations and proposals have repeatedly clashed with conservation and tourism interests, leading to mining bans in certain areas and suspensions of permits. The provincial government has taken steps to limit mining to protect Palawan's UNESCO Biosphere Reserve status and tourism economy, which depends on pristine beaches, coral reefs, and wildlife.³⁷ Research and advocacy groups have documented that mining threatens the island's environmental integrity and tourism brand.
101. **Doñana National Park, Andalusia, Spain: Aznalcóllar Mine Disaster and Proposed Reopening.** Doñana, a UNESCO World Heritage wetland and one of Europe's most important nature tourism destinations, has experienced both the direct impact of mining and sustained pressure from proposals to reopen the upstream Aznalcóllar copper mine. In 1998 a tailings dam failure at the mine released an estimated four to five million cubic metres of toxic waste into the Guadiamar River, reaching the edges of the park, killing wildlife, and requiring a three-year, €240-million cleanup operation. UNESCO has repeatedly flagged the ongoing threat from proposals to reopen the mine, citing risks to the park's aquifer, water birds, and biodiversity. The case illustrates how a single mining disaster upstream of a tourism asset can cause lasting reputational and ecological harm, and how even the prospect of reopening a mine near a World Heritage destination draws sustained international regulatory resistance.³⁸
102. **Intag Valley, Ecuador: Copper Mining (Llurimagua Project)** The Intag Valley in Ecuador's cloud forest region has been the site of a decades-long conflict over copper mining. The valley is known for eco-tourism, community-based tourism, and biodiversity, and local communities have repeatedly resisted mining projects, arguing they would destroy forests, water sources, and the area's tourism potential.³⁹ Despite ongoing conflict, the case is frequently cited in academic literature as an example of communities defending tourism and agricultural livelihoods against extractive industries.⁴⁰

³⁵ <https://www.reuters.com/legal/litigation/us-blocks-mining-parts-minnesota-dealing-latest-blow-antofagastas-copper-project-2023-01-26/>

³⁶ <https://www.sciencedirect.com/science/article/abs/pii/S0308597X18300836>

³⁷ <https://www.theguardian.com/environment/2026/mar/12/clean-energy-demands-philippines-island-nickel-palawan-mining-environment-aoe>

³⁸ UNESCO State of Conservation on 1998 Aznalcóllar mine tailings disaster: <https://whc.unesco.org/en/soc/2193>; ongoing mining pressure documented in: <https://whc.unesco.org/en/soc/4220>

³⁹ <https://news.mongabay.com/2023/03/ecuador-court-upholds-rights-of-nature-blocks-intag-valley-copper-mine/>

⁴⁰ <https://repub.eur.nl/pub/111767/Thesis.pdf> and

<https://www.sciencedirect.com/science/article/pii/S2589811625000199> for example

103. **Jabiluka Uranium Mine, Kakadu National Park, Northern Territory, Australia (Rejected 1998, Lease Refused 2024).** The proposed Jabiluka uranium mine, located within an enclave surrounded by the World Heritage-listed Kakadu National Park, became one of Australia's most significant mining–tourism conflicts. In 1998 a UNESCO mission found the mine constituted an “ascertained danger” to Kakadu's natural World Heritage values, and an eight-month blockade by over 5,000 protesters was led by the Mirarr Traditional Owners. The park hosts hundreds of thousands of international visitors attracted by its tropical wetlands, rock art, and wildlife; uranium mining within its boundaries had the potential to directly undermine Kakadu's status and global reputation as a pristine wilderness destination. After decades of dispute, in July 2024 the Northern Territory Government declined to renew the mining lease, and the Australian federal government moved to incorporate the site into the national park, ending the threat permanently. The decision was explicitly framed around honouring the rights of the Mirarr and protecting a landscape whose cultural and ecological values far exceeded the short-term economic benefit of mineral extraction.⁴¹
104. **Lower Zambezi National Park, Zambia: Proposed Copper Plant (Reversed c. 2019).** A proposal by Australia's Mwembeshi Resources to construct a large copper plant within the Lower Zambezi National Park — one of Zambia's premier safari and canoe-safari tourism destinations — was reversed by the Zambian government following sustained opposition from conservation groups, tourism operators, and international observers. The Lower Zambezi, known for its exceptional wildlife, wild riverine landscapes, and high-value low-volume tourism model, was considered wholly incompatible with industrial mining development. The reversal demonstrated that tourism's economic and reputational value in protected areas can override extractive investment even when mineral deposits are commercially attractive.⁴²
105. **Melmoth / KwaZulu-Natal, South Africa: Proposed Jindal Iron Ore Mine.** Research published in 2025 examined the threat posed by a proposed Jindal iron ore mine to the Melmoth area of KwaZulu-Natal, a region with significant cultural heritage, biodiversity, and agricultural character that supports nascent eco-tourism and agro-tourism potential. The study found that local communities viewed mining as incompatible with sustainable rural development, and identified tourism as a more viable long-term pathway for regional regeneration. The case is representative of a wider pattern across rural South Africa, where extractive proposals increasingly compete with emerging tourism economies in landscapes whose value depends on their cultural and environmental integrity.⁴³

The importance and relevance of Santana's fast-track application to overall future activity in Otago.

106. This report focusses on concerns about the impacts on tourism of the mining activities proposed by Santana under this fast-track application.
107. However, the significance of this application reaches far beyond this one proposed mine. There is heightened interest from foreign mining companies seeking mining permits in Otago, and the industry will be waiting on the outcome of this fast-track application,

⁴¹ Australian Government Minister for Resources, media release (July 2024):

<https://www.minister.industry.gov.au/ministers/king/media-releases/work-begins-add-jabiluka-site-kakadu-national-park>; UNESCO mission report on Jabiluka danger to World Heritage values (1999): <https://whc.unesco.org/document/988>

⁴² Regional context including the Zambia Lower Zambezi reversal: <https://miningzimbabwe.com/national-parks-mining-ban-shows-regulation-is-broken/>

⁴³ Sithole and Mulder (2025), "From mining consideration to mindful tourism in Melmoth, KwaZulu-Natal": <https://www.tandfonline.com/doi/full/10.1080/13549839.2025.2560358>

which will set a precedent for similar large-scale mining applications under the fast-track legislation. The cumulative impact of multiple industrial scale mining projects throughout the landscape of Otago would present a significant threat to the regional tourism economy, for all of the reasons outlined in the previous sections of this report.

108. In recent years there has been a surge in mining permits.
 - a. In 2024, a record number of 450 applications for mining permits were received – an increase from 296 received in 2023.
 - b. 2025 saw yet another increase, with New Zealand Minerals and Petroleum (NZPAM) confirming “record levels of mineral permit applications received and outcome decisions made in 2025.”⁴⁴ – specifically, 551 applications.
 - c. Thirty-six new permits targeting gold were approved to overseas and New Zealand-based companies in Otago.⁴⁵
109. A vast area of Otago, and notably Central Otago, is now covered by mining permits and applications. These permits (and some which are permit applications in the process of being approved) can be seen on the government mining permit website maintained by NZPAM.⁴⁶ I have included a screen grab of permits in Otago below (figure 3).⁴⁷

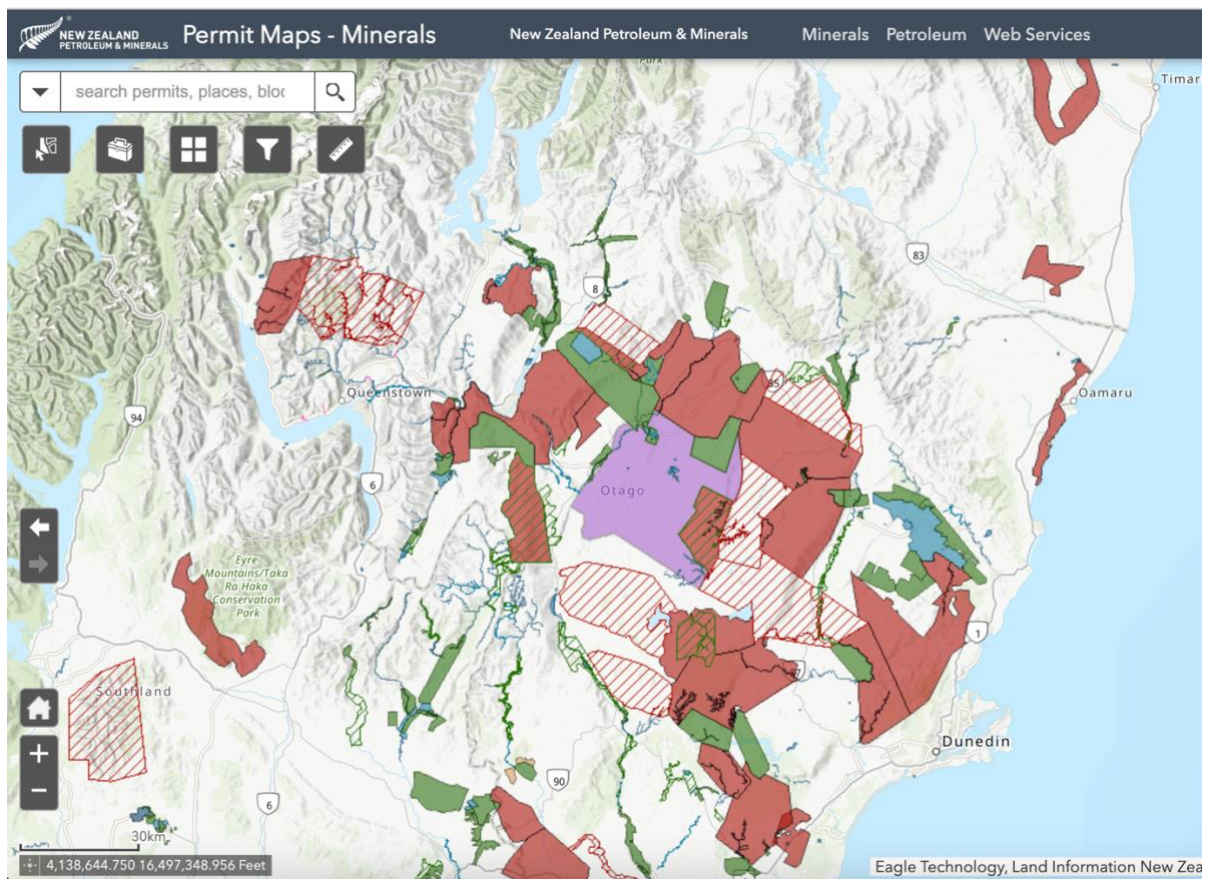


Figure 3. A screen grab of the NZPAM mining permit map taken at 2038 on Saturday 4th April 2026, showing all live mining permits (in red, green and blue) and applications (in stripes).

110. Many of these permits are held by foreign mining companies or their subsidiaries. Examples include Euro Gold Ventures Pty Limited (Australia), KO Gold NZ Limited (Canada),

⁴⁴ <https://www.nzpam.govt.nz/about/news/minerals-permitting-data-for-2025-shows-growing-momentum>

⁴⁵ <https://newsroom.co.nz/2026/02/25/farms-pegged-out-from-under-owners-feet-in-modern-day-gold-rush/>

⁴⁶ <https://www.nzpam.govt.nz/>

⁴⁷ <https://gis.nzpam.govt.nz/permitwebmaps/?commodity=minerals>

111. It is no secret within the mining industry that all eyes are on Santana's application, and that foreign mining companies are focussed on New Zealand resources in Otago. There are numerous references to Santana's fast-track project in other foreign company's market announcements and media statements. One such example is KO Gold NZ Limited.

- a. KO Gold, listed in Canada, currently holds permits spanning well over 1,000 square kilometres in Otago alone, with a particular focus of 400 square kilometres in Central Otago. The CEO of that company has been quoted in the media saying that Central Otago is the "the new West African gold belt".⁴⁸
- b. In a market update on 10 November 2025 where the company confirmed further drilling would take place on its Carrick Project near Bannockburn, the following reference was made to Santana's fast-track application by KO Gold: "The Otago Gold Belt's gold potential is underscored by the long-standing success of OceanaGold's Macraes Mine [...] and by Santana Minerals' rapid mine development at its Bendigo-Ophir Gold Project, located northwest of Macraes Mine along a similar shear zone. [...] On November 5, 2025, Santana Minerals announced that the New Zealand government had granted a Mining Permit for the Bendigo-Ophir Gold Project, a major step towards reaching the production phase with ongoing permitting and consents being approved through the recently enacted Fast-track Approvals Act allowing mining projects to reach production much faster than in the past."⁴⁹ This announcement included a map specifically point out the location of Santana's proposed mine and Macraes, relative to the "Carrick Gold Field."
- c. KO Gold's corporate presentation, available on its website, further references Santana's Bendigo mine project throughout the presentation, including results from Rise and Shine drilling.⁵⁰
- d. In March 2026, a further announcement was made about drilling at the Carrick Project, adding: "The Carrick EP is located near the feasibility-stage Bendigo-Ophir Gold Project being advanced by Santana Minerals (ASX: SMI) under New Zealand's fast-track permitting regime, highlighting the broader exploration potential of the district." The statement also included the following statement from the CEO:⁵¹

*"KO Gold has assembled a highly prospective land position in the Otago Gold Belt, and we **are now preparing to test several priority targets** through drilling," said Greg Isenor, CEO of KO Gold. "With drilling planned at both the Smylers Gold and Carrick EPs, we are entering **an exciting phase of exploration in a district** that is seeing renewed momentum. **The progress Santana Minerals is making at the nearby Bendigo-Ophir project further demonstrates the potential of this gold belt.**" (Emphasis added in bold)*

112. Minister of Resources and Regional Development, Shane Jones, has said "I'm in the business of green-lighting mining. [...] So no-one should be surprised that I'm promoting mining at weapons-grade levels."⁵² He has made numerous similar remarks in Parliament,

⁴⁸ <https://businessdesk.co.nz/article/markets/ko-gold-has-eye-on-central-otago-as-new-west-african-gold-belt>

⁴⁹ <https://www.juniorminingnetwork.com/junior-miner-news/press-releases/3342-cse/kog/191089-ko-gold-provides-exploration-and-drilling-update-on-its-otago-gold-belt-permits-in-new-zealand.html>

⁵⁰ https://wp-kogoldnz-2025.s3.ca-central-1.amazonaws.com/media/2025/06/KO-Gold-Corporate-Presentation_May-2025.pdf

⁵¹ <https://kogoldnz.com/news/ko-gold-announces-application-for-otcqb-venture-market-listing/>

⁵² <https://www.thepost.co.nz/nz-news/360898009/shane-jones-backs-mining-weapons-grade-level-calls-sam-neill-anti-kiwi>

in the media and on his own social media channels, confirming that New Zealand is “open for business” for foreign owned mining companies, and that we are entering a “golden age” of mining.

113. As the first “green fields” gold mining fast-track application for a large scale operation in Central Otago, it is clear that there is significant industry interest in Santana’s current application on the part of other foreign companies. The cumulative impact of multiple large scale mining projects would, for the reasons outlined in this paper, pose a significant threat for the tourism industry, and would in my view damage New Zealand’s 100% Pure NZ tourism brand. It is therefore of crucial importance that despite the time-pressures presented and procedural short-cuts offered by the fast-track process, the decision is made with a full set of independent information, covering all issues for the panel.

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