Applicant Responses to Relevant Comments from Other on the Waihi North Project

This document contains comments from the following parties:

- Minister for Economic Growth – The Honourable Nicola Willis – Comments 47 and 48;
- Fish and Game – Comments 98 to 111;
- MBIE – Comments 144 to 145;
- Minister for Resources – Comments 146 to 148;
- Ministry for Culture and Heritage – No comments;
- Waikato Conservation Board – Comments 149 to 172;
- Forest and Bird – Comments 173 to 212;
- HNZPT – Comments 216 – 216;
- Martha Trust – Comment 217;
- NZTA – Comments 218 to 231;
- Parliamentary Commissioner for the Environment – Comments 232 to 240; and
- Coromandel Watchdog – Comments 241 to 330.

Comments from Minister for Economic Growth - The Honourable Nicola Willis

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
47	Support of short and long term regional and national economic benefits as stated within substantive application economic assessment through employment, total operational and capital expenditure and foreign direct investment and capital investment allocated.	Economics		-
48	Acknowledgement of the proposals contribution to exports aligning with ambitions to double exports by 2040 and how the project aligns with the Government's Minerals Strategy as part of the Going for Growth work programme.	Economics		-

Comments from Fish and Game

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
98	The habitat of trout and associated values has not been appropriately recognised, assessed or provided for.	Freshwater Ecology	**B.43 – Boffa Miskell – Freshwater Ecological Assessment**	Trout have been assessed in section 22.1.8 of application document B.43.
99	Proposed mitigation measures to avoid, remedy or offset adverse effects on freshwater ecosystems is inadequate.	Freshwater Ecology	-	Refer to the statement prepared by Mr Ian Boothroyd, appended as **Appendix P**.
100	The use of previously consented discharges as a baseline for determining the acceptability of new or expanded discharges is contrary to best practice.	Freshwater Ecology	-	The current limits implemented as part of existing discharges are endorsed by the WRC, with them having been designed to avoid, remedy, and mitigate adverse effects on the environment. Annual biodiversity monitoring reports are prepared as part of existing WRC approvals held by the applicant, with monitoring showing the existing parameters are working appropriately to manage effects.
101	Stream habitat loss and the proposed enhancements do not replace the functional, established habitat for trout spawning and survival.	Freshwater Ecology	-	Refer to response provided to Comment 98.
103	The ecological assessments do not adequately assess, avoid or address, the effects of diversions on sensitive spawning areas (inconsistent with the NPS-FM).	Freshwater Ecology	-	Refer to response provided to Comment 98.
109	Stream reclamation should be avoided, or where unavoidable, physical habitat should be improved.	Freshwater Ecology	-	Refer to the statement prepared by Mr Ian Boothroyd, appended as **Appendix P**.
110	Real-time monitoring of discharge quality should be publicly provided and ties to consent compliance.	Freshwater Ecology	-	The proposed monitoring regime emulates the current monitoring regime in terms of water quality. This has been discussed with WRC who are satisfied with this element of the proposal.

Comments from MBIE

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
144	MBIE welcomes the opportunity to comment on draft conditions when they are available and they should appropriately balance the management of environmental and conservation effects with the project's potential to deliver significant economic benefits without undue constraints.	Procedural	-	-
145	MBIE considers the development of the underground declines to be a pragmatic and environmentally responsible option.	Option Assessment	-	-

Comments from Minister for Resources

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
146	The Project will be a significant contributor to the national economy.	Economics	-	-
147	The project will expand and extend the life of the mine, enable highly paid and stable jobs, including direct and indirect roles.	Economics	-	-
148	The Waihi North Project aligns with Government priorities for natural resources and would be of great regional and national benefit.	Economics	-	-

Comments from Minister for Culture and Heritage

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
N/A	No comment	-	-	-

Comments from Waikato Conservation Board

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
150	The actual and potential effects of the application on the Coromandel Forest Park are a significant departure from the state that would normally be expected from protected lands of this status.	Terrestrial Ecology	**A.09 – Mitchell Daysh – Substantive Application Report - Assessment of Effects; and B.37 - Boffa Miskell - Terrestrial Ecology Assessment.**	Application document B.37 provides a detailed assessment of the actual and potential effects of the WNP on terrestrial ecological values of the Coromandel Forest Park. The key effects on the Coromandel Forest Park are temporary loss of vegetation and low (but uncertain) adverse effects on Archey's and Hochstetter's frogs. These effects will be avoided where possible, and appropriately minimised and remedied with any residual uncertain effects on native frogs to be offset and compensated for with extensive pest management to increase frog populations, and provision of research funding.
151	The effects of the activity on the parks natural resources require careful consideration to ensure the granting of the proposal is justified.	Terrestrial Ecology		Refer to comment 150.
152	There are concerns around the situation of two endemic frog species and the potential for wider impact on the ecosystem.	Terrestrial Ecology	**B.37 - Boffa Miskell - Terrestrial Ecology Assessment; B.38 – RMA Ecology – Assessment of Effects on Native Frogs; B.39 – Bioresearches – Native Frog Effects Assessment; Attachment 1 to Part 2 - 3**	While application document B.37 notes that the project has the potential to effect Archey's and Hochstetter's frogs from vegetation clearance and habitat disturbance at ventilation shaft and exploration drilling areas, air quality from ventilation evasé, groundwater drawdown effects on surface water habitat and vibration from vibration, these effects have been avoided, remedied or mitigated so that any residual effects are minor or negligible. For any remaining low but uncertain risk for native frogs, the applicant proposes further intensive pest control within and outside of WUG footprint to increase the frog population and offer financial support for researchers to undertake investigative work within the WUG and wider habitat (frog) enhancement areas to assess the efficacy of pest control regimes for frog recovery. Refer to the statement provided by Mr Dylan van Winkel, appended as **Appendix D.** Refer to the statement provided by Mr Christopher Simpson, appended as **Appendix G**. Refer to the statement provided by Mr Brian Lloyd, appended as **Appendix J**. Refer to the statement provided by Ms Katherine Muchna, appended as **Appendix K.**

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
				Refer to the statement provided by Dr Graham Ussher, appended as **Appendix M.** Refer to the statement provided by Ms Helen Blackie, appended as **Appendix N.** Refer to the statement provided by Mr Ian Boothroyd, appended as **Appendix P.** Refer to the statement provided by Ms Cassandra McArthur, appended as **Appendix Q**.
153	Concerns around the Archey's Frog population estimates and the subsequent use of the data in other areas of the reporting.	Terrestrial Ecology	-	Refer to the statement provided by Mr Brian Lloyd, appended as **Appendix J**. Refer to the statement provided by Dr Graham Ussher, appended as **Appendix M.**
154	Due to the uncertainty of frog population, a precautionary approach greater than that provided in the application is required.	Terrestrial Ecology	-	Refer to the statement provided by Dr Graham Ussher, appended as **Appendix M.** Refer to the statement provided by Mr John Kyle, and Ms Abbie Fowler, appended as **Appendix H**.
155	Concerns are held around the likelihood and scale of dewatering events and the mitigation measures proposed.	Hydrology/Geohydrology/Freshwater Ecology/Wetlands	**B.48 - NIWA Wharekirauponga Instream Habitat; B.44 - Boffa Miskell - Effects on Potential Flow Changes; and B.45 - Williamson Water & Land Advisory - Wetland Hydrological Assessment**	The effect of potential dewatering on the natural state of the Wharekirauponga Stream and its tributaries has been assessed by NIWA (2024) and Boffa Miskell (2025d). These reports conclude that even under worst-case scenario modelling, the natural state and ecological values of the mainstem and tributaries of the Wharekirauponga Stream will be retained. WWLA (2025e) identified that some wetlands within the Area of Investigation are at risk of dewatering effects; however, the modelling predicts that the likelihood of dewatering occurring for wetlands is very low. If effects of dewatering are detected, it is proposed that remedial actions such as provision of supplementary water, grouting of fissures which drain shallow groundwater and / or reinjection of water into aquifers may occur to augment flows Refer to the statement provided by Mr Christopher Simpson, appended as **Appendix G**.
156	Notes that the purpose of the land conservation status is to protect natural resources and questions why mineral extraction should be allowed.	Terrestrial Ecology		Surface works within the Coromandel Forest Park are limited to a relatively low number of drill sites, portable rig sites and ventilation evasé. A detailed set of requirements will govern the site selection and vegetation clearance process for these sites. These are based on some of the requirements the Department of Conservation has imposed on the clearance of the applicant's existing exploration drilling sites in the Coromandel Forest Park in the past which have proven protective of ecological values.
157	Due to the uncertainty of frog populations, it is considered the effects of vibration on frog populations would be unacceptably high.	Terrestrial Ecology	**B.37 - Boffa Miskell - Terrestrial Ecology Assessment**	Boffa Miskell' s Terrestrial Ecology Assessment notes that there is no evidence to verify vibration sensation or perception in leiopelmatid frogs, nor is there firm evidence that vibration leads to a particular response in these frogs. The best available comparator is the previous mining activity at Golden Cross, where blast vibrations of typically <5 mm/s and infrequently up 10 mm/s were experienced and both Archey's and Hochstetter's frog populations remained abundant over the life of the mine. Refer to the statement provided by Mr Dylan van Winkel, appended as **Appendix D.** Refer to the statement provided by Mr Brian Lloyd, appended as **Appendix J**. Refer to the statement provided by Ms Katherine Muchna, appended as **Appendix K.** Refer to the statement provided by Dr Graham Ussher, appended as **Appendix M.** Refer to the statement provided by Ms Helen Blackie, appended as **Appendix N.** Refer to the statement provided by Ms Cassandra McArthur, appended as **Appendix Q**.
158	Concerns the Pest Management Plan won't provide sustained reductions in predator numbers due to the characteristics of the site and proposed control area.	Pest Animal Management	-	Refer to statement provided by Ms Helen Blackie, appended as **Appendix N.**

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
159	Considers the uncertainty in the success of the pest control operation may be sufficient to outweigh the risks to the ecosystem from the mining operations.	Pest Animal Management	-	Refer to statement provided by Ms Helen Blackie, appended as **Appendix N.** Refer to the statement provided by Dr Graham Ussher, appended as **Appendix M.**
160	Concerned the Pest Management Plan Report doesn't recognise that both species of native frog are known to reside within the Wharekireoponga Forest Park and that they require moisture for survival, either running water or at least a moist environment.	Pest Animal Management	-	Refer to statement provided by Ms Helen Blackie, appended as **Appendix N.**
161	Concerned the Pest Management Plan Report provide no mention of either deer, goats, ferrets, weasels or cats as pests.	Pest Animal Management	-	The general pest management approach for proposed for deer and goat control is ground based shooting and the proposed ground-based bait station/trapping network overlayed with a three yearly aerial 1080 operation should adequately reduce numbers of ferret, weasels and cats as well as the mentioned possums, rats and mustelids. Also refer to statement provided by Ms Helen Blackie, appended as **Appendix N.**
162	Disagrees with the Pest Management Plan Report listing Whiteheads/Popokota *(Mohoua albicilla*) and Yellow Crowned Kakariki (*Cyanoramphus auriceps*) as being present in the area.	Pest Animal Management	**B.37 – Boffa Miskell – Terrestrial Ecology Values and Effects of the WUG**	Both these species have been recorded in the Coromandel Forest Park during baseline ecological surveys. Refer to the application document B.37, Table 5.
163	Recommended conditions are proposed: • The Terms of Reference for the Biodiversity Plan is currently unsigned. This needs to be approved and signed off by the Biodiversity Project Group. • Any Animal Pest Plan needs to approved by DOC and monitored for initial implementation and ongoing outcomes with a pest free target for all species – deer, ungulates, cats, mustelids, rodents and hedgehogs. • Given the recent outcomes of gut analysis of mustelids and cats at the Mahakirau Project off the 309 Road, several kilometres north of Wharekirauponga an ideal addition to the Pest Animal plan would be gut analysis of all cats and mustelids to identify prey. Those captures further north are showing evidence of frogs and reptiles but also seabirds. • Recognising the correct species would also be helpful to ensure the reporting and management is completed correctly.	Pest Animal Management/Planning/Terrestrial Ecology	-	Biodiversity Plan conditions are provided in the Combined HDC and WRC condition set – C36.
164	Concerns that the mining operation will not uphold the Waikato CMS goals and strategies.	Terrestrial Ecology	-	Refer to the statement provided by Mr John Kyle, and Ms Abbie Fowler, appended as **Appendix H**.
165	Proposed conditions to manage the effects on the Waikato CMS and user experience of the areas: • The WCB supports the recommended conditions as outlined in the Recreation and Tourism Assessment Report if consent is to be granted: • Ensure drilling activity and helicopter activity to service drill sites within 400 m of the Wharekirauponga Track cease from 1 December to 28 February inclusive when the track is open. • Should the tracks open during the consent period (and the Board supports that the tracks do not close), routine helicopter operations should cease near the Wharekirauponga Track. • The WCB also supports the mitigations suggested which should be used. These include: (i) Locating the raises as far away as possible from established walking routes; (ii) Avoiding locating the raises on any tramway formations; (iii) Developing track detours away from the raise sites. • The Board would also support that the Wharekirauponga Track be upgraded by OGNZL at the time the mine is closed.	Planning/Ecology	-	These conditions are already included in the draft Wharekirauponga Access Arrangement and are in line with the current approach to management effects on recreation and heritage features.
166	Request for independent review to be undertaken of the groundwater assessment due to uncertainty associated with the assessments, and the effects on the water table and water quality.	Hydrology, Hydrogeology, Groundwater, Freshwater	-	Refer to the statement provided by Mr Christopher Simpson, appended as **Appendix G**.
167	Concern that the degradation of intact ecosystems cannot be replaced or compensated for.	Terrestrial Ecology/Freshwater Ecology	-	Refer to statement provided by Ms Katherine Muchna, appended as **Appendix K.** Refer to the statement provided by Dr Graham Ussher, appended as **Appendix M.**

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168	Consent conditions should specify threshold draw-down values or streamflow reductions beyond which operations must cease and mitigation must be implemented.	Hydrology, Hydrogeology, Groundwater	-	Respond trigger levels already in place. These are the bottom line that must be maintained by the Consent Holder. Refer to the statement provided by Mr Christopher Simpson, appended as **Appendix G**
169	Plans should detail contingency measures if tunnelling intersects pressurised aquifers or perched water bodies – including grouting, ground-freezing, bulkheads and temporary shutdowns.	Hydrology, Hydrogeology, Groundwater	-	In relation to grouting, refer to statement provided by Mr Chris Simpson, appended as **Appendix K.** The WUG Mine Water Management Plan includes key contingency measures that would be used in the event that unexpected groundwater conditions occur.
171	Consent conditions should require that the project delivers no net decline in groundwater levels or stream flows within conservation lands and should provide for mitigation or offset measures if unforeseen impacts arise.	Hydrology, Hydrogeology, Groundwater	-	Groundwater levels must necessarily be drawn down to enable mining. The proposed conditions already provide for the protection of stream flows.
172	Concerned the connection between groundwater and surface water in the catchment is not fully understood. Recommends that any consent conditions incorporate requirements to undertake such investigations and to adapt management plans if the results reveal greater connectivity than currently assumed.	Hydrology, Hydrogeology, Groundwater	-	Refer to statement provided by Mr Chris Simpson, appended as **Appendix K.**

Comments from Forest and Bird

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
173	Due to the ecological features of the area and the uncertainty of the of the projects effects the application should not be approved under section 85 of the FTAA.	Terrestrial Ecology/Freshwater Ecology	-	Refer to statement provided by Mr Stephen Christensen, appended as **Part 1.**
174	The substantive application is inconsistent with (or has failed to demonstrate consistency with) important resource management and conservation policies.	Terrestrial Ecology/Freshwater Ecology	-	Refer to statement provided by Mr John Kyle and Ms Abbie Fowler, appended as **Appendix H.**
175	Concerns the panel members are biased and that the Applicant has influenced the panel appointment process. Forest & Bird considers that in these circumstances, Mr van Voorthuysen should recuse himself.	Procedural	-	Refer to statement provided by Mr Stephen Christensen, appended as **Part 1.**
176	Concerned that the number of drill sites proposed is outside the scope of the approvals that the substantive application can properly seek through the FTAA process.	Procedural/Geotechnical/Legal	-	Refer to statement provided by Mr Stephen Christensen, appended as **Part 1.**
177	Concerns are held around the scope of approvals sought under the Wildlife Act not being clear and consistent across the application and are therefore outside of the scope of the FTAA. Forest and Bird suggest the wildlife permit of 30 years is too long due to the uncertainty of effects and if granted a very short term should be imposed.	Procedural/Terrestrial Ecology/Freshwater Ecology/Legal	-	Refer to statement provided by Mr Stephen Christensen, appended as **Part 1.**
178	Concerns are held around the scope of the access arrangement and the application not including an access arrangement for activities on the surface of land.	Legal	-	Refer to statement provided by Mr Stephen Christensen, appended as **Part 1.**
179	Forest and Bird consider an access arrangement is required if frogs are affected by vibrations.	Terrestrial Ecology	-	Refer to statement provided by Mr Stephen Christensen, appended as **Part 1.**
180	Forest and Bird request consideration is given to Clause 17-22 of Schedule 5 of the FTAA and identifies other court decisions which support their position that the statutory requirement to give an Act's purpose the most weight does not mean that it will always outweigh other considerations.	Legal/Procedural	-	-
181	Forest and Bird consider the regional benefits of the project but consider the Canadian ownership of the company means the benefits are reduced.	Economics	-	Refer to statement provided by Mr Shamubeel Eaqub, appended as **Appendix B.**
182	Forest & Bird disagrees with the extent of benefit claimed for the biodiversity enhancement package. As: • The measures offset/compensate for environmental effects so can't be considered a "benefit" • The effectiveness of measures is uncertain The funding is proposed 10-years post closure and will not be maintained in the long-term.	Terrestrial Ecology/Freshwater Ecology	-	It is assumed that this comment refers to the Biodiversity Project and it appears there is some confusion regarding the purpose of the Biodiversity Project. The Biodiversity Project is not intended to offset/compensate for environmental effects. It is a discretionary measure offered by the applicant, over and above the effects management package. The Project is intended to be designed in consultation with iwi, and therefore exact objectives and measures have not been agreed yet.
183	There is uncertainty the approach taken to protecting frogs is conservative.	Terrestrial Ecology	-	Refer to statement provided by Dr Graham Ussher, appended as **Appendix M.**
184	Concerns that the science behind population estimates presented on behalf of the applicant is not robust and includes considerable uncertainties and overestimation.	Terrestrial Ecology	-	Refer to statement provided by Mr Stephen Christensen, appended as **Part 1.** Refer to the statement provided by Mr Brian Lloyd, appended as **Appendix J**.

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				Refer to statement provided by Dr Graham Ussher, appended as **Appendix M.**
185	There is considerable uncertainty on the size of the frog population and the magnitude of effects (such as vibration, exposure to ventilation discharges, noise, dewatering, the survival from translocation, vegetation clearance and drilling, the effectiveness of the pest management strategy, habitat suitability for translocated frogs and cumulative effects).	Terrestrial Ecology	-	Refer to the statement provided by Dylan van Winkel, appended as **Appendix D.** Refer to the statement provided by Mr Brian Lloyd, appended as **Appendix J**. Refer to the statement provided by Ms Katherine Muchna, appended as **Appendix K.** Refer to the statement provided by Dr Graham Ussher, appended as **Appendix M.** Refer to the statement provided by Ms Helen Blackie, appended as **Appendix N.** Refer to the statement provided by Ms Cassandra McArthur, appended as **Appendix Q**.
186	Forest and Bird consider the technical reports downplay the potential effects and the effects are very high.	Terrestrial Ecology	-	Refer to the statement provided by Dylan van Winkel, appended as **Appendix D.** Refer to the statement provided by Mr Brian Lloyd, appended as **Appendix J**. Refer to the statement provided by Ms Katherine Muchna, appended as **Appendix K.** Refer to the statement provided by Dr Graham Ussher, appended as **Appendix M.** Refer to the statement provided by Ms Helen Blackie, appended as **Appendix N.** Refer to the statement provided by Ms Cassandra McArthur, appended as **Appendix Q**.
187	Forest & Bird submits that the Applicant's approach is far from precautionary as required by the NPS-IB.	Terrestrial Ecology	-	Refer to statement provided by Mr John Kyle and Ms Abbie Fowler, appended as **Appendix H.**
188	Uncertainty regarding the adaptive management of frogs and how this would be enforced. It is considered this is unacceptable and not consistent with a precautionary approach.	Terrestrial Ecology	-	Updates to conditions require 3x the frog limit to be met. Refer to statement provided by Dr Graham Ussher, appended as **Appendix M.** Refer to statement provided by Mr John Kyle and Ms Abbie Fowler, appended as **Appendix H.**
190	Forest & Bird submits that a very prescriptive adaptive management approach would be required to manage effects that are uncertain such as the effect of vibration on frogs. Mining could only be allowed in stages, with mining only able to progress to the next stage if the effects are shown to be acceptable	Terrestrial Ecology	-	The applicant does not agree with this. The proposed approach is robust. Refer to statement provided by Mr John Kyle and Ms Abbie Fowler, appended as **Appendix H.**
191	Forest & Bird consider the applicant is seeking to downplay the the impact of habitat loss and vegetation clearance by referring to the point that the vegetation proposed to be removed within the Coromandel Forest Park will be no more than 0.66ha in total area.	Terrestrial Ecology	-	Refer to statement provided by Ms Katherine Muchna, appended as **Appendix K.**
192	Forest & Bird consider that where ecological features are very rare, an impact on those features over even a very small area will be a very significant impact.	Terrestrial Ecology	-	Refer to statement provided by Ms Katherine Muchna, appended as **Appendix K.**
192a	Addresses potential effects to native lizards.	Terrestrial Ecology	-	Refer to statement provided by Ms Katherine Muchna, appended as **Appendix K.**
193	Forest & Bird considers that compensation for lizard habitat loss is inappropriate and inadequate when it comes to these high value endangered species, and that the applicant should be required to avoid significant residual adverse effects.	Terrestrial Ecology	-	Refer to statement provided by Mr Chris Wedding, appended as **Appendix V.**
194	Forest & Bird considers the effect of dewatering to be highly uncertain. This uncertainty is of significant concern given the fact that the ecological values and ecological integrity of the Wharekirauponga Sub-Catchment are very high.	Hydrology, Hydrogeology, Groundwater	-	Refer to statement provided by Mr Chris Simpson, appended as **Appendix G.** Refer to statement provided by Mr Ian Boothroyd, appended as **Appendix P.**
195	Forest & Bird is concerned that within this area of higher risk mining could result in dewatering effects much more significant than predicted. The level of uncertainty regarding the effects of dewatering (which has a high potential impact) is unacceptable.	Hydrology, Hydrogeology, Groundwater	-	Refer to statement provided by Mr Chris Simpson, appended as **Appendix G.**
196	Concerns that it could take up to 30 years for any effects to come right / recharge.	Hydrology, Hydrogeology, Groundwater, Terrestrial Ecology	-	This statement overstates the risks of groundwater effects at the surface. Refer to statement provided by Mr Chris Wedding, appended as **Appendix V.** Refer to statement provided by Mr John Kyle and Ms Abbie Fowler, appended as **Appendix H.**

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197	Forest & Bird also refers to the uncertainties in the groundwater modelling, that may result in an even higher potential for effects on freshwater biodiversity, wetlands and associated loss of habitat or vegetation.	Hydrology, Hydrogeology, Groundwater, Terrestrial Ecology, Freshwater Ecology	-	Refer to statement provided by Mr Chris Simpson, appended as **Appendix G.** Refer to the statement provided by Mr Tim Mulliner, appended as **Appendix E**.
198	It is of significant concern that the extent to which water bodies (including wetlands and Natural State waterbodies) will be affected and whether the measures to address any effects will be successful is unknown.	Freshwater Ecology		Refer to statement provided by Mr Chris Simpson, appended as **Appendix G.** Refer to the statement provided by Mr Tim Mulliner, appended as **Appendix E**.
199	Forest & Bird considers the conditions proposed in relation to waterbodies are not adequate and the mitigation measures are not sufficient. Forest & Bird request trigger levels are set to avoid adverse effects and that more stringent limits are proposed.	Freshwater Ecology		Refer to statement provided by Mr Chris Simpson, appended as **Appendix G.** Refer to the statement provided by Mr Tim Mulliner, appended as **Appendix E**.
200	Forest & Bird considers that reclamation of stream beds has not been identified correctly within the application and that the diversion of waterbodies also constitutes reclamation. Forest & Bird considers this to be a significant omission.	Freshwater Ecology		Refer to statement provided by Mr Ian Boothroyd, appended as **Appendix P.**
201	Forest & Bird are concerned that some important management plans (including the Northern Rock Stack Monitoring and Management Plan and the TSF Monitoring and Management Plan) have not been provided in the application.	Planning		The objectives and information requirements associated with each of these management plans is included in consent conditions and the plans required certification by the regulator before any work can commence under the plan. The applicant follows existing management plans for similar types of activities associated with it existing projects.
202	Forest & Bird considers that should consent be granted it is important that the bond and trust fund proposed as conditions are sufficient to ensure rehabilitation and closure outcomes can be achieved; and also to allow for remediation should unforeseen effects arise in the future.	Social Impact		Bond and trust conditions are replicated from OGL's existing consents and are deemed adequate to cover WNP activities. Refer to statement provided by Mr Stephen Christensen, appended as **Part 1.**
203	Forest & Bird consider the application is contrary to Part 2 of the RMA including the purpose of sustainable management and the need to safeguard the life-supporting capacity of water and ecosystems.	Freshwater Ecology/Terrestrial Ecology		Refer to statement provided by Mr Chris Wedding, appended as **Appendix V.** Refer to statement provided by Mr John Kyle and Ms Abbie Fowler, appended as **Appendix H.**
204	Forest & Bird submits that functional need requirements under the NPS-FW has not been established, and the effects management hierarchy has not been applied, and as such this regulation directs that consent not be granted.	Freshwater Ecology	**A.11 – Mitchell Daysh – Fast Track Approvals Act Requirements.**	Refer to statement provided by Mr John Kyle and Ms Abbie Fowler, appended as **Appendix H.** The applicant has undertaken detailed options analysis work for each component of the WNP that impacts waterbodies and, for a variety of reasons, has concluded that there is a functional need (refer section 8.7.3.7) for those activities to occur in the specified locations. Aspects like location of the orebody, proximity to mining infrastructure, geotechnical considerations and land ownership are all relevant in this respect. The effects management hierarchy has been applied in a manner consistent with the requirements of the NES Freshwater and NPS-FM. With all the effects management measures proposed as part of the WNP, there will be an overall net gain in freshwater and biodiversity values (while allowing for mineral extraction activities to occur which have significant national and regional benefits).
205	Forest & Bird submits that the proposal is inconsistent with (the NPS-FW) Policy 1 and Policy 6, the functional need test under Policy 7 has not been met and the proposal is contrary to Policy 8.	Freshwater Ecology		Refer to statement provided by Mr Ian Boothroyd, appended as **Appendix P.** Refer to statement provided by Mr John Kyle and Ms Abbie Fowler, appended as **Appendix H.**
206	Forest & Bird submits that the proposal does not meet/is contrary to the policy framework in the NPS-IB, specifically: Policy 3 and Policy 7.	Terrestrial Ecology	**A.11 – Mitchell Daysh – Fast Track Approvals Act Requirements.**	Refer to statement provided by Dr Graham Ussher, appended as **Appendix M.** Refer to statement provided by Chris Wedding, appended as **Appendix V.** In addition to the above, an assessment of the NPS-IB was undertaken in the Substantive Application which determined the policy direction under the NPS-IB was met, including Policy 3 and Policy 7.
206a	The principles of biodiversity offsetting are not adhered to. Specifically, that the effects of the proposal on indigenous biodiversity are uncertain or little understood, but the potential effects are significantly adverse or irreplaceable.			Refer to statement provided by Mr Chris Wedding, appended as **Appendix V.**
207	Forest & Bird submits that the proposal is contrary to the objectives and policies of other relevant planning documents. Including objectives and policies of the Regional Policy Statement, Regional Plan and the Hauraki District Plan.	Planning	**A.11 – Mitchell Daysh – Fast Track Approvals Act Requirements.**	The Substantive Application undertook an assessment of the Regional Policy Statement, Regional Plan and the Hauraki District Plan (refer sections 8.7.3.10-8.7.3.12) and determined the application was not contrary to the objectives and policies.
208	The proposed measures do not adequately mitigate effects on frogs and lizards. The concession and wildlife approval activities have the potential to adversely affect	Terrestrial Ecology		Refer to the statement provided by Mr Dylan van Winkel, appended as **Appendix D.** Refer to the statement provided by Mr Brian Lloyd, appended as **Appendix J**.

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	conservation values, including the likely disturbance and killing of threatened and at risk fauna.			Refer to the statement provided by Ms Katherine Muchna, appended as **Appendix K.** Refer to the statement provided by Dr Graham Ussher, appended as **Appendix M.** Refer to the statement provided by Ms Helen Blackie, appended as **Appendix N.**
209	Should consent be granted Forest & Bird agree with DOC's recommendation to include a condition to achieve the avoidance of any at risk or threatened species found within the sites	Terrestrial Ecology		Complete avoidance of all threatened species is not possible at all sites. Where possible, OGL has included avoidance measures. The site selection protocol and salvage translocation process has been assessed as adequately protective by the applicant's technical experts. Refer to the statement provided by Ms Cassandra McArthur, appended as **Appendix Q**. Refer to the statement provided by Ms Katherine Muchna, appended as **Appendix K.**

Comments from HNZPT

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213	Heritage New Zealand Pouhere Taonga (HNZPT) state they have no objection to the approval of the Resource Consent application and that it be approved in accordance with B.49, B49.a-B49.b and the updated proposed resource consent conditions.	Historic and Archaeological Background	-	-
214	HNZPT note that OGNZL have used the CVA/CIA reports to guide their processes with the project in implementing cultural advice with some iwi with exception to NPKH) writing their support for the proposal with OGNZL committed to engagement to accommodate traditional practices and adverse effects are avoided.	Cultural	-	-
215	The project area does not contain any sites entered on the New Zealand Heritage List/Rārangi Kōrero or sites contained on the Schedule of Historic Heritage Inventory with it needed to be noted that the proposed activity is in close proximity to Martha Mine and associated historic heritage features.	Terrestrial Ecology	-	-
216	HNZPT comment on three of the proposed conditions (HDC Condition 89, TDC Condition 47 and WRC/HDC Condition C29) referencing heritage matters and suggest retaining the conditions as worded)	Historic and Archaeological Background	-	No changes to these conditions are sought by the applicant.

Comments from the Martha Trust

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
217	Martha Trust in accordance with Clause 8.2 of the Martha Trust Deed, the Trustees have resolved to await any formal requests from Hauraki District Council and Waikato Regional regarding potential recommendations for amendments to the Trust Deed.	N/A	-	-

Comments from NZTA

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
218	NZTA confirm following previous consultation in 2021 and 2022 and suggested measures that OGNZL have addressed and incorporated previous feedback in their application regarding transportation related matters.	Transportation	-	-
219	NZTA supports the TIA recommendation to consider additional benching or batter cutting along State Highway 25 to improve visibility (sight distances) while maintaining safety for the services trench corridor.	Transportation	-	-

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
219a	Agrees with ITA's assessment of anticipated traffic volumes and vehicle movements.	Transportation	-	-
220, 230a, 230b	NZTA agrees that given the speed environment and vehicle movements along State Highway 25 that a Right Turn Bay is warranted and agrees that the intersection shall be upgraded (to the satisfaction of NZTA – Combined Condition 72 along with a specified timeframe of when this must occur). NZTA has proposed an amendment to proposed Combined Condition 73 to link in additional requirements for the intersection (including street lighting, pavement edges, shoulder treatments and tie ins, protection or relocation of Powerco poles and chipseal requirements or alternative treatment, stormwater and drainage details and geometric re-alignment of the State Highway).	Transportation	-	Some amendments have been made to the conditions in response to this.
220a	Agrees a formal left-turn lane is not warranted based on modelled volumes and sight distance issues.	Transportation	-	-
221	NZTA seek an advice note that the consent holder is legally required to apply to NZTA for a corridor access request that must be approved for works within the State Highway corridor.	Transportation	-	This has been linked into the conditions.
222	NZTA seek a Temporary Traffic Management Plan 40 days prior commencement within Proposed Conditions.	Transportation	-	Some amendments have been made to the conditions in response to this.
223	NZTA comment that the technical assessments do not provide confirmation or adequate investigation into effects of the Access Tunnel and associated works on NZTA infrastructure which is vital given the substantial works proposed to suitably inform NZTA and further protect their assets.	Transportation	-	The tunnel passes at depth beneath SH25 in andesite rock. Mining in andesite rock has been undertaken successfully at similar depths beneath Waihi East since the mid 2000's without damage to buildings or roading infrastructure. Surface settlement monitoring is in place along SH25 currently and will continue to be reviewed as part of the Dewatering and Settlement Monitoring Plan.
224	Mining and tunnelling operations near State Highway 2 and State Highway 25 may induce surface pavement deformations and dewatering of surface features and tunnels, mechanical settlement from drill and blast operations of Access Tunnel are key drivers in subsequent impacts on NZTA infrastructure.	Transportation		Refer to response provided to Comment 223.
225	NZTA understands the identified mitigation measures within the EGL Settlement Report will be proposed and given effect to as part of future works.	Transportation	-	-
226	NZTA support the dewatering and settlement monitoring plans within the Proposed Conditions and agree with the purpose stated within Condition C44 to prevent dewatering and settlement adversely affecting NZTA infrastructure.	Transportation	-	-
227	NZTA seek amendment of proposed Condition C46 relating to reporting of the dewatering and settlement monitoring plan with NZTA seeking effects and risk to NZTA infrastructure that have been identified should be provided to NZTA, infrastructure and building owners adversely affected.	Transportation	-	Some amendments have been made to the conditions in response to this.
228	NZTA support independent peer reviews of assessments, mitigations and monitoring undertaken by technical specialists as prescribed by Conditions C50-C58.	Transportation	-	-
229	NZTA notes additional settlement markers and piezometers have been proposed by the Applicant for structures not owned by Applicant. If installed within the vicinity of a State Highway it is considered that this location should be reviewed and approved by NZTA and if within a State Highway Corridor a CAR is applied for and approved. An advice note has been proposed regarding CARs.	Transportation	-	Some amendments have been made to the conditions in response to this.
230	NZTA comment that the services are to be installed via horizontal thrusting should have a minimum 1.5m cover from the top of the services to ground level as stated within the application and a CAR is required for this work.	Transportation	-	The services trench has been approved separately to the Fast-track application with an associated CAR obtained. As such this comment is not relevant to this application.
231	NZTA seeks the Panel include its proposed conditions and advice notes to ensure that NZTA is suitably informed and NZTA assets are suitably protected and welcomes further discussion with OGNZL regarding the upgrades at SH25 and Willows Road.	Transportation	-	-

Comments from Parliamentary Commissioner for the Environment

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
232	Parliamentary Commissioner for the Environment (PCE) notes that in order for Panel to determine whether the significant regional or national benefits are greater than the costs the project might impose including social and	Procedural/Economics	-	Refer to statement provided by Mr Shamubeel Eaqub, appended as **Appendix B.**

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
	environmental effects, the panel needs a robust and reliable assessment of benefits and costs (cost-benefit analysis).			
233	The Parliamentary Commissioner for the Environment advises the Expert Panel to be wary of solely relying on an applicant's economic analysis given the incentives to overstate benefits and underestimate costs noting OGNZ's economic analysis appears to be based on a multiplier model which requires further clarification because of their known limitations and propensity to overestimate impacts regionally and nationally.	Economics	-	Refer to statement provided by Mr Shamubeel Eaqub, appended as **Appendix B.**
234	As a result of the multiplier effects being of limited value in demonstrating benefit because of the diversion of resources from other economic activities, the Parliamentary Commissioner for the Environment recommends the Panel only consider direct economic benefits created by the project which is 197 jobs and 192 contractors.	Economics	-	Refer to statement provided by Mr Shamubeel Eaqub, appended as **Appendix B.**
235	If the Panel is minded receiving a more accurate estimate of benefits at a national level the Parliamentary Commissioner recommends a computable generalized equilibrium model.	Economics	-	Refer to statement provided by Mr Shamubeel Eaqub, appended as **Appendix B.**
236	The Parliamentary Commissioner notes the applicant's analysis completely overlooks environmental costs which should be set out in full with biodiversity impacts and loss of ecosystem services from the entire mine area should be included in the economic analysis.	Terrestrial Ecology/Freshwater Ecology	-	Refer to statement provided by Mr Shamubeel Eaqub, appended as **Appendix B.**
237	The PCE suggests using the Total Economic Framework to demonstrate environmental costs with stated preference techniques also could be used to estimate the value society attaches to the existence of particular species in the area.	Terrestrial Ecology/Freshwater Ecology	-	Refer to statement provided by Mr Shamubeel Eaqub, appended as **Appendix B.**
238	The PCE recommend the Panel given its powers to seek additional information advice and expertise commission a detailed assessment of costs of the project given the shortcomings of the applicant's cost-benefit analysis.	Economics	-	Refer to statement provided by Mr Shamubeel Eaqub, appended as **Appendix B.**
239	PCE encourages Panel to consider how and to what extent costs are managed through setting of appropriate conditions and is clear on the points at which monitoring converts into action in these conditions specifically stating what effects might trigger a need for the applicant to change or cease its operations with clear responsibility for who is responsible for compliance.	Procedural/Planning	-	Refer to statement provided by Mr John Kyle and Ms Abbie Fowler, appended as **Appendix H.** Some amendments have been made to the conditions in relation to this.
240	The PCE cautions the Panel on relying on offsets and compensation for managing effects especially for biodiversity.	Terrestrial Ecology	-	Refer to the evidence of the various consultant ecologists, including that of Dr Graham Ussher, appended as **Appendix M.**

Comments from Coromandel Watchdog

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
241	The application fails to meet the section 85 threshold and should be declined in full or in part.	Legal	-	Refer to statement provided by Mr Stephen Christensen, appended as **Part 1.**
242	Concern there is no cyanide management plan provided with the application.	Hazardous Substances/Geochemistry	-	Refer to statement provided by Mr Robert Van De Munckhof, appended as **Appendix A.**
243	Oceana Gold is not a signatory of the International Cyanide Management Code.	Hazardous Substances/Geochemistry	-	The applicant report on the RGMPs each year and are assured externally against this. Principal 8.3 requires alignment to the requirements of the cyanide code - https://oceanagold.com/wp-content/uploads/2021/12/OceanaGold-Statement-of-Position-Cyanide-Management.pdf
276	"Although OceanaGold has never stated a commitment to comply with the International Cyanide Management Code, but without the third-party audits that would be required by becoming a signatory, it has been my experience that companies with such commitments do not comply with the actual International Cyanide Management Code, but with their own version of the code."	Hazardous Substances/Geochemistry	-	The applicant are committed to implementing and conforming to the Responsible Gold Mining Principles and are externally assured against our alignment to the RGMPs. As above, the RGMPs require alignment to the cyanide code.
244	OceanaGold has not committed to the Responsible Gold Mining Principles of the World Gold Council.	N/A	-	As above, the Applicant is committed to implementing and conforming with, the World Gold Council's (WGC) Responsible Gold Mining Principles (RGMPs) to embed responsible gold mining practices in our operations and annually disclose the status of OceanaGold's conformance with the RGMPs.

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
245	Concerns there is a risk of other chemical elements in the local environment beyond what is projected due to cyanide mobilization.	Hazardous Substances/Geochemistry	-	Refer to statement provided by Mr Ian Jenkins, appended as **Appendix C.**
277	Although the application emphasizes the high arsenic, antimony and mercury contents in the ore body and the tailings, there is no consideration of the ability of cyanide to mobilize those elements and, thus, increase the arsenic, antimony and mercury concentrations in the tailings pond and tailings pore water.	Hazardous Substances/Geochemistry	-	Refer to statement provided by Mr Ian Jenkins, appended as **Appendix C.**
277a	In paragraphs 22 to 25 of Mr Emerman's statement, he paraphrases sections of the Geochemical Assessment relating to trace elements elevated in the GOP, which include antimony, arsenic and mercury. Mr Emerman then goes on to state that the application does not recognise "the ability of cyanide to extract" these trace elements, going on to conclude that the concentrations in tailings porewater have therefore been underestimated.	Geochemistry	-	Refer to statement provided by Mr Ian Jenkins, appended as **Appendix C.**
246	Concerns that mercury has been identified as being immobile in groundwater.	Groundwater/Geochemistry	-	Refer to statement provided by Mr Ian Jenkins, appended as **Appendix C.**
247	Concern there is no plan to address the risk of mercury transfer from the project site in the event of following or tailings dam collapse.	Geochemistry	-	The risk of a tailings dam collapse is discussed in the statement provided by Mr Trevor Matuschka, appended as **Appendix S.**
248	Concern the chemical impacts of unplanned release of mine tailings has not been addressed for downstream waterbodies, aquatic life and groundwater.	Hazardous Substances/Geochemistry/Freshwater Ecology	-	Mr Zac Woods has advised: Detailed site specific erosion and sediment control plans and the implementation of the SSESCP, monitoring and maintenance will mitigate these risks.
278	The Pre-Feasibility Study (OceanaGold, 2024) does not describe a plan for the destruction of the cyanide in the tailings pore water prior to deposition of the tailings in TSF3.	Hazardous Substances/Geochemistry	-	Refer to statement provided by Mr Ian Jenkins, appended as **Appendix C.**
279	Based on the high precipitation and the past history of sulfide-ore mining, the release of acid mine drainage and the contamination of groundwater and downstream waterways should be an expected outcome of the Waihi North Project.	Hazardous Substances/Geochemistry/Groundwater	-	Refer to statement provided by Mr Ian Jenkins, appended as **Appendix C.**
280	Concern over lack of knowledge as to how much PAF material will exist and the existence of sufficient NAF material to cap the PAF material.	Contamination	-	Refer to statement provided by Mr Ian Jenkins, appended as **Appendix C.**
281	The proposal for a permanent water cover on TSF3 is not recommended by the mining industry because of its detrimental impact on the physical stability of the tailings dam.	Geotechnical	-	Refer to statement provided by Mr Trevor Matuschka, appended as **Appendix S.**
282	The application provides no information regarding how the permanent water cover will be maintained.	Geochemistry	-	Refer to statement provided by Mr Trevor Matuschka, appended as **Appendix S.**
284	Concerns that based upon mining industry guidance, it should be assumed that the eventual collapse of the tailings dam at the proposed Waihi North Project (regardless of perpetual maintenance) with the release of the confined tailings into downstream waterway is inevitable.	Geotechnical	-	Refer to statement provided by Mr Trevor Matuschka, appended as **Appendix S.**
283	The application does not include any plan for perpetual maintenance of the water cover. On that basis, it could be assumed that, eventually, the water cover will dry up and the exposed sulfidic tailings will be converted into sulfuric acid.	Geochemistry/Hazardous Substances	-	Refer to statement provided by Mr Trevor Matuschka, appended as **Appendix S.**
285	The overall problem with the closure plan for the tailings storage facility at the Waihi North Project is that there is no plan for long-term monitoring, inspection, maintenance and review of the facility.	Geochemistry/Hazardous Substances	-	Refer to statement provided by Mr Trevor Matuschka, appended as **Appendix S.**
286	The lack of any mineral reserves and thus a mining plan means that it is impossible to meaningfully assess the environmental impact of the proposed Waihi North Project at the present time.	N/A	-	Refer response to 286a.
286a	There is no mining plan for the Waihi North Project because OceanaGold still does not know whether there is anything worth mining.	N/A	-	Oceana Gold published a Waihi District NI43-101 Technical Report, supported by a Feasibility Study, declaring 4.1Mt of probable reserve equating to 1.2Moz of Gold (Au) at an average grade of 9.2g/t Au of the Wharekirauponga Underground Mine (WUG). The feasibility study includes details of the geology and mineralisation, the mine design, including tunnelling to the resource, mineral processing, surface and underground infrastructure, capital and operating costs and a financial evaluation.
286b	OceanaGold (2024) did not report any measurable resources for any of their mining areas.	N/A	-	Measurable Resources is not a recognised standard definition under Committee for Mineral Reserves International Reporting Standards (CRIRSCO) international reporting standards. If reporting to a Measured Resources, the highest confidence resource category typically only achieved in an Epithermal Ore body

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
				during mining and following lateral development prior stoping when geological continuity is confirmed at high resolution. Indicated Resources may be Converted to a Probable Mineral Reserve, as detailed Waihi District NI-43-101 Technical Report published 11 December 2024.
286c	OceanaGold (2024) did not report any measurable resources for any of their mining areas (see Fig. 1a), no proven reserves for any of their mining areas (see Fig. 1b), and not even any probable reserves for either the MOP (Martha Open Pit) or the GOP (Gladstone Open Pit).	N/A	-	Ore is converted to proven reserve equivalent during mining and immediately preceding production, but this is immaterial to the company Reserve and Resource Statement with only small relative quantities available at any given time.
286d	Mining plans are developed based upon the sum of probable reserves plus proven reserves. OceanaGold (2024) confirms, "Mineral Resources that are not Mineral Reserves do not have demonstrated economic viability".	N/A	-	Yes, this is correct. Since there must be "reasonable prospects for eventual economic extraction," the conversion of an ore body into a commodity cannot be only a theoretical possibility. In other words, the estimation of resources must be based upon a particular cut-off grade with an assumed commodity price, along with many other factors. Conceptual mine design constraints and cut-off grades are stated in footnotes to the resource table. E.g. *Mineral Resources are reported at a gold price of $1,950/oz, Mineral Resources estimate for WUG is reported within a conceptual underground design at a 2.10 g/t Au cut-off grade.*
286e	The conversion of resources into reserves is based upon "Modifying Factors," which may include "mining, processing, metallurgical, infrastructure, economic, marketing, legal, environmental, social and governmental factors" (CIM, 2014).	N/A	-	The Waihi District currently mines remnant areas within the Martha Underground (MUG), providing strong factual basis for the local assessment of reasonable prospects for eventual economic extraction. The WUG resource has an average grade (taking into account the modifying factors) of almost 3 times that of MUG (3.8g/t Au (MUG) vs 9.2g/t Au (WUG)) and therefore is approximately 3 times more valuable than MUG.
286f	Mineral resources and mineral reserves	N/A	-	The applicant protects the investor and maintains fair and balanced reporting of uncertainty at WUG by using appropriate Indicated Resource and Probable Reserve classifications in alignment with CIM and international best practice. This allows confidence and risk to be considered appropriately by the market. In practice, high resolution data informing final design and mine planning analogous to that required for Measured Resource classification is gathered during Grade Control processes (Drilling, Face Sampling, Mapping, ore drive development) during mining and preceding final stope design within the short term planning cycle. Given the frequent turnover of this material, and small quantities of potential Measured Resource available at any given relative to the Indicated and Inferred resource, it is considered immaterial to the Resource and Reserve statement and therefore is reported as Indicated Resource.
287a	The absence of any mineral reserves and, thus, the absence of any mining plan means that the most basic information is missing.	N/A	-	Reserves clearly outlined in NI43-101 and the table 1b referenced by Mr Emerman. Mineral Reserve is established from Indicated Resource by Pre-Feasibility Study which, at the time of reporting, demonstrates that extraction could be reasonably justified.
287b	It is impossible to evaluate the above claims when there is no information as to how much low-mercury NAF waste rock will be available or whether there will be any low-mercury NAF waste rock.	N/A	-	Mercury and other deleterious elements are routinely assayed, modelled and estimated to inform material type classifications. I.e. we good data, the analysis of which are externally reviewed, and the results considered in materials balance studies. In the instance of GOP, the applicant had collected multi-element assays including Hg, As, Sb on all drilling and thereby has data density equivalent to the Au estimate. While differences in geostatistacal properties mean the Au confidence classification cannot be directly applied, it is largely analogous. I.e. at GOP, ~80% of the material is supported by a data density *"sufficient to assume geological and grade continuity between points of observation"* with the remaining 20% *"sufficient to imply but not verify geological and grade continuity".* High resolution material classification including NAF and mercury modelling would be undertaken during grade control processes preceding mining.
287c	The current application for the Waihi North Project is premature and should be paused until OceanaGold has established the existence of mineral reserves and developed a mining plan (sometimes called the general plan of operations).	N/A	-	Reserves <u>are</u> established and supported by the Waihi District NI-43-101 Technical Report published 11 December 2024, as referenced by Mr Emerman, who additionally presents the Reserves table as Figure 1b. The Technical Report is a 215 page Pre-Feasibility Study level report and detailing all pertinent information necessary to support reserve declaration including Mineral Reserves and Resources, Mining Methods, Recovery Methods, Infrastructure, Environmental Studies, Permitting, Social and Community Impact, Costs and Economics.
287d	Mineral Resources that are not Mineral Reserves do not have demonstrated economic viability (Figure 1a).	Economics	-	Correct. This footnote explicitly states this so as to leave no room for confusion by the investor. Demonstration of economic viability takes place via currency of Pre-Feasibility or Feasibility studies. Not all resources are currently subject to this, and hence reserves are not declared on MOP, GOP. All of this is entirely in adherence to the reporting code. Refer to statement provided by Mr Shamubeel Eaqub, appended as **Appendix B.**
249	Concerns that plans to manage the terminal life of highly toxic chemicals have not been provided.	Hazardous Substances/Geochemistry	-	Refer to statement provided by Mr Ian Jenkins, appended as **Appendix C.**

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
250	Contamination of groundwater is an expected outcome and is a chemical time bomb.	Groundwater/Hydrology/Hydrology/Geochemistry	-	Refer to statement provided by Mr Ian Jenkins, appended as **Appendix C.**
252	The stream ecosystem diversion and relocation is not feasible and will result in adverse impact on the species relocated.	Freshwater Ecology	-	Refer to statement provided by Mr Ian Boothroyd, appended as **Appendix P.**
253	Offsetting does not justify the destruction and relocation of waterways.	Freshwater Ecology	-	Refer to statement provided by Mr Ian Boothroyd, appended as **Appendix P.**
254	Treatment of mine wastewater to remove pollutants is not addressed in the Boffa Miskell Report.	Freshwater Ecology	-	Treatment of mine wastewater has been undertaken by the applicant and its predecessors over more than 30 years. The applicant has a strong compliance record over this time, and aquatic ecology effects have not be recorded over this period. The same compliance limits are proposed as part of WNP.
255	Concern the vibrations from underground blasting will affect local species including the Archey's Frog.	Terrestrial Ecology	-	Refer to statement provided by Mr Stephen Christensen, appended as **Part 1.** Refer to statement provided by Mr Dylan Van Winkel, appended as **Appendix D.**
256	Concerns there will be significant adverse effects on streams and wetlands from the dewatering of groundwater and that the assessment/modelling of wetlands is limited.	Freshwater Ecology	-	Refer to statement provided by Ms Kate Feickert, appended as **Appendix T.**
257	Concerns the seismic hazard assessment is inadequate and outdated, and the seismic hazard is underestimated.	Geotechnical/Natural Hazards	-	Refer to statement provided by Mr Trevor Matuschka, appended as **Appendix S.**
	New insights (Villamor et al., 2024 and Dempsey et al.,2020) collectively suggest higher ground motions and an increased liquefaction potential for both the tailings and surrounding infrastructure than implicitly or explicitly considered by OG.	Geotechnical/Natural Hazards	-	The two reports stated will be used in the detailed design and building consent, prior to constructing the TSF.
289	The evidence presented by Oceana Gold to the Fast Track Approval Panel lacks a comprehensive assessment of land movement rates (from highly accurate InSAR data) and extent across its existing Waihi gold mining operation, including the open pit, waste dumps, and tailings dam.	Geotechnical	-	All movement withing the Martha Open Pit, Waste Rock Stacks and the two existing Tailings Dams are monitored in rea-time, with TARPs established, should there be any detected movement. The same will apply to the WNP surface infrastructure and GOP. Refer to statement provided by Mr Trevor Matuschka, appended as **Appendix S.**
288	The assertion that "a breach of the TSFs is highly unlikely" and the risk is "extremely low" requires critical re-evaluation.	Natural Hazards	-	Under the NZ Dam Safety Guideline, a breach of the TSFs is "highly unlikely" and the risk is "extremely low", determined by our independent engineer of record (Engineering Geology Ltd). Refer to statement provided by Mr Trevor Matuschka, appended as **Appendix S.**
290	Concern over the "Perfect Storm" Scenario: Compounding Natural Hazards.	Natural Hazards	-	The dam is designed for a Probable Maximum Precipitation (PMP) event (e.g., The "perfect storm").
258	Concern the assessments have not taken into account the effect of dewatering of groundwater on the habitat of Archey's and Hochstetler's frogs and the significant adverse impact this will have.	Freshwater Ecology/Groundwater/Hydrology/Geohydrology/Terrestrial Ecology	-	Refer to statement provided by Dr Graham Ussher, appended as **Appendix M.**
259	Concerned the population models for Achey's frogs are unreliable and overstated, based on irregular and limited sampling data.	Terrestrial Ecology	-	Refer to statement provided by Mr Brian Lloyd, appended as **Appendix J.**
330	The population at Wharekirauponga, behind Waihi, represents one of just two remaining strongholds. With an estimated 5,000–20,000 frogs left in total, every habitat is critical to their survival and risks to the population must not be taken.	Terrestrial Ecology	-	Refer to statement provided by Mr Brian Lloyd, appended as **Appendix J.**
260	Concerned around the ability to translocate frogs and the long-term establishment of species.	Terrestrial Ecology	-	Refer to statement provided by Ms Katherine Muchna, appended as **Appendix K.**
309	The sensitivity of frogs to noise and vibration has not been adequately addressed.	Terrestrial Ecology/Noise/Blasting and Vibration	-	Refer to statement provided by Mr Dylan Van Winkel, appended as **Appendix D.**
310	Authorisation of the mining activity will be contrary to the Convention of Biological Diversity and NZ Biodiversity Strategy.	Terrestrial Ecology/Freshwater Ecology	-	Refer to the statement provided by Mr John Kyle, and Ms Abbie Fowler, appended as **Appendix H**.
310a	Prof. Waldman asserts at paragraph 19 of their evidence that the proposed mining is incompatible with the survival of New Zealand's endemic frog species.	Terrestrial Ecology	-	Refer to statement provided by Mr Dylan Van Winkel, appended as **Appendix D.** Refer to statement provided by Mr Brian Lloyd, appended as **Appendix J.**
261	Disagreement with the effect of mining operations on frogs being "minor" capable of being mitigated.	Terrestrial Ecology	-	Refer to the statement provided by Dr Graham Ussher, appended as **Appendix M.** Refer to the statement provided by Dylan van Winkel, appended as **Appendix D.**

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				Refer to the statement provided by Mr Brian Lloyd, appended as **Appendix J**. Refer to the statement provided by Ms Katherine Muchna, appended as **Appendix K.** Refer to the statement provided by Ms Helen Blackie, appended as **Appendix N.**
262	The "Precautionary Principle" for effects on other species in the environment has not been applied where the effect is unavoidable and more than minor.	Terrestrial Ecology/Freshwater Ecology		Refer to statement provided by Mr John Kyle and Ms Abbie Fowler, appended as **Appendix H.** Refer to statement provided by Ms Kate Feickert, appended as **Appendix T.**
296	The avoidance of adverse effects (on wetlands, plant species, freshwater habitats and frogs) have not been mitigated appropriately and the redesign of avoidance would be a precautionary pathway.	Freshwater Ecology	-	Refer to statement provided by Mr John Kyle and Ms Abbie Fowler, appended as **Appendix H.** Refer to statement provided by Mr Stephen Christensen, appended as **Part 1.**
296a	Mr Kendal questions the feasibility and effectiveness of the mitigation measures for wetlands described in the Wetland Ecological Effects Assessment.	Freshwater Ecology	-	Refer to statement provided by Ms Kate Keickert, appended as **Appendix T.**
263	The pest control proposed has ignored the requirement to avoid adverse effects and substitutes pest control as a compensation matter.	Pest Animal Management	-	Refer to statement provided by Mr Stephen Christensen, appended as **Part 1.**
264	Concerns pest control will only occur for the duration of mining activities and not for a future period when the mining activities will continue.	Pest Animal Management	-	Consent conditions require the applicant to continue pest control for a minimum of 10 years, or until the completion of stoping with an additional two years after stoping finishes, whichever is greater.
265	Concerned the waterflow reductions have been assessed inadequately.	Hydrology/Freshwater Ecology	-	Refer to statement provided by Mr Chris Simpson, appended as **Appendix G.**
266	The assessment of impacts on streams is lacking in evidence to support the proposed offsetting/compensation and the avoiding of adverse effects has been given little priority.	Freshwater Ecology	-	Refer to statement provided by Mr Ian Boothroyd, appended as **Appendix P.**
267	Concerned the economic benefits are not proven, likely to be overstated and do not take into account the cost of losing natural resources.	Economics	-	Refer to statement provided by Shamubeel Eaqub, appended as **Appendix B.**
326	The social impact assessment doesn't acknowledge the impact on the community at Whangamata and doesn't discuss the social issues of the mine.	Social Impact	-	Refer to statement provided by Hilary Konigkramer, appended as **Appendix F.**
327	The mining operations causes stress to members of the community and the blasting and vibration should be designed for vulnerable people.	Social Impact/Blasting and Vibration	-	The assessment of blasting and vibration and the subsequent mitigation measures proposed are in accordance with the New Zealand Standards and are therefore appropriate.
271	Concerned the social impacts of effects such as noise, dust, blasting and vibration, damage to homes and property, mental health issues as a result of blasts have not been assessed.	Social Impact/Noise/Blasting and Vibration	-	Refer to statement provided by Hilary Konigkramer, appended as **Appendix F.**
272	The application is impacting the Waihi community and the fear of what the effects of the mining are once the mining operation ceases.	Social Impact	-	The effect of mining ceasing on the community has been assessed as part of the Social Impact Assessment. Within the 5-years prior to closure, the applicant is to prepare a Socio-Economic Impact Assessment to inform the impact of mine cessation activities on the community. Community and stakeholder participation is to inform the assessment.
273	There is an "*absence of a clear and consistent voice of support for the mining project from iwi, hapū, hāpori groups or others who represent the diverse range of interests and livelihoods of Māori*"	Cultural	-	Refer to statement provided by Mr Kyle Welten, appended as **Appendix I.**
274	Concern no Cultural Impact Assessments have been prepared at the time of submitting evidence.	Cultural	-	Refer to statement provided by Mr Kyle Welten, appended as **Appendix I.**
275	Concern the social impact specific to local maori has not been considered in the assessments.	Cultural	-	The Social Impact Assessment has considered the WNP at a whole of community level, including local maori. In addition to this, engagement has been undertaken with local iwi, refer to the statement provided by Mr Kyle Welten, appended as **Appendix I.**
312	Cultural assessments must mitigate concerns that mining will threaten whakapapa-based connections by degrading land and water systems, polluting ecosystems, and disrupting the foundations of Māori wellbeing.	Cultural	-	Refer to statement provided by Kyle Welten, appended as **Appendix I.**
314	The Climate, Energy Use and Greenhouse Gas Emissions Chapter of the Application provides inadequate data for a proper critique, there is no future modelling of emissions related to the expansion of the mines.	Climate Energy Greenhouse	**B.08 – OGNZL – Climate Energy Greenhouse Management**	It is agreed that this is not modelled, but it is discussed in application document B.08.
315	There is no data on the emissions profile of the concrete and steel use in this project including the tunnels in the WUG project and reliance on grouting in the mine.	Climate Energy Greenhouse	-	The applicant has a target for Scope 1 and 2 emissions reduction. Concrete and steel are Scope 3 which the applicant currently does not measure. In 2024, the applicant also progressed a review of our existing climate-related metrics and targets to test and assess opportunities to strengthen the foundation, systems and processes that support our interim 2030 target and approach. The applicant has maintained a 100% renewable electricity agreement for our New Zealand operations since April 2021 and plan to continue this agreement as part of a new contract which is expected to commence in May 2025. Refer to statement provided by Mr Shamubeel Eaqub, appended as **Appendix B.**

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316	The suggestion that the Company will contribute positively to net zero/ climate zero national emissions is not substantiated. In fact the project will add to the country's emissions and is not a renewable energy success story.	Climate Energy Greenhouse	-	Refer to statement provided by Mr Shamubeel Eaqub, appended as **Appendix B.**
317	The Application does not address the increased risk of fire resulting from dewatering beneath the forest, (forest drying), as referred to in Mr Hamish Kendal's evidence.	Natural Hazards/Groundwater/ Hydrology/Geohydrology	-	Refer to statement provided by Mr Dylan Van Winkel, appended as **Appendix D.**
318	The risk of fire from dewatering is particularly heightened in drought conditions which are widely considered to be likely to increase over the coming years.	Natural Hazards/Groundwater/ Hydrology/Geohydrology	-	Refer to statement provided by Mr Dylan Van Winkel, appended as **Appendix D.**
319	Concerns around the confidence of the of the tailings dam stability long-term.	Geotechnical	-	Refer to statement provided by Mr Trevor Matuschka, appended as **Appendix S.**
320	Concern the ecological effects of subsidence on the forest has not been considered in enough detail.	Settlement/Terrestrial Ecology/Geotechnical	-	Refer to statement provided by Dr Graham Ussher, appended as **Appendix M.**
320a	Reference to the legacy of mining in the Coromandel area, two historic mine sites area mentioned and the difference in scale between these mines and the Waihi North Proposal noted.		-	Refer to statement provided by Mr Ian Jenkins, appended as **Appendix C.**
321	Concerns the information provided around the impact of the ventilation shafts on frogs and possibly other wildlife is admitted but minimised.	Terrestrial Ecology	-	Refer to statement provided by Dr Graham Ussher, appended as **Appendix M.** Refer to statement provided by Mr Dylan Van Winkel, appended as **Appendix D.**
321a	Frogs in the forest have practically no exposure to dust in their natural state and there is no data or research on what particulates containing chemicals from mine dust might do to their sensitive bodies	Terrestrial Ecology	-	Refer to statement provided by Mr Richard Chilton, appended as **Appendix L.**
322	Describing the pm10 levels only refers to size but not particulate make-up (or toxicity). Comparing the forest to an unpaved dusty road is not an appropriate comparison.	Air Discharge	-	Refer to statement provided by Mr Richard Chilton, appended as **Appendix L.**
323	There is uncertainty around some air quality effects not being addressed in the application.	Air Discharge	-	Refer to statement provided by Mr Richard Chilton, appended as **Appendix L.**
324	The proposed pest control plan lacks several crucial considerations, making it potentially inefficient, unsafe, and financially unviable.	Pest Animal Management	-	Refer to statement provided by Ms Helen Blackie, appended as **Appendix N.**
325	The pest control plan doesn't understand the pig population dynamics over time, pig control limitations, movement of pigs, size of a suitable management area and thus totally underestimates what will be required to maintain zero density. Additionally, the 1km buffer is insufficient for both goats and pigs.	Pest Animal Management	-	Refer to statement provided by Ms Helen Blackie, appended as **Appendix N.**
298	A monitoring programme is required within the pest control area including pig monitoring.	Pest Animal Management	-	Refer to statement provided by Ms Helen Blackie, appended as **Appendix N.**
299	A pig management budget is requested.	Pest Animal Management	-	Refer to statement provided by Ms Helen Blackie, appended as **Appendix N.**
300	A budget is requested to understand the effect of mice on frogs within the pest control area.	Pest Animal Management	-	Conditions of consent require the applicant to meet targets associated with the pest management plan. The applicant will be required to meet all costs associated with meeting these targets.
301	The B40 pest control plan is a high-level framework of ideas. It does not consider the practical effects of the proposed pest control on the actual biodiversity objectives and then target the management decisions and methods towards this. There is a raft of practicalities that are not in the plan which are required to resource a large pest control operation like this.	Pest Animal Management	-	Conditions of consent require the applicant to meet targets associated with the pest management plan. The applicant will be required to ensure that the plan is resourced adequately so the targets can be met.
302	The budget for pest control is significantly underfunded.	Pest Animal Management	-	No budget has been provided for implementing the pest management plan; however, the applicant will be required to adequately fund and resource the pest management to meet the proposed consent conditions. It is assumed the budget referred to in this comment is for the **Waihi North Biodiversity Project,** which is not proposed to manage effects. The scope and objectives of this project will be defined based on the budget committed to by the applicant.
303	A project of this scale must be bonded to ensure that OceanaGold does not walk away from it. The bond will need to be 150% the value of all the setup costs, ongoing management and monitoring of the project area and beyond. The project must have targets approved by DOC that are to be reached before any bond money is released.	Social Impact	-	Refer to statement provided by Mr Stephen Christensen, appended as **Part 1.**

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
329	Request the consent conditions require a Social Impact Management Plan.	Social Impact	-	A Social Impact Management Plan is an existing document utilised by the applicant for mine operations, and such a plan is proposed with this application.
311	There are gaps in the frogs and lizards information with regard to incidental harm, salvage and the northern striped gecko.	Terrestrial Ecology	-	Refer to statement provided by Ms Katherine Muchna, appended as **Appendix K.**
308a	Mr Easton says at paragraph 2 of their evidence that suggesting no impact from vibration on leiopelmatid frogs is "nonsensical."	Blasting and Vibration	-	Refer to statement provided by Mr Dylan Van Winkel, appended as **Appendix D.**
306	The data used to inform the water management studies is outdated and does not confirm if the existing compliance matters are being met.	Water Management	-	The most up to date data available has been used in all water management studies, including monitoring data collected from OGL's current projects over 30 years.
304	There are concerns about the significant adverse impacts (and the way these are managed through consent conditions) arising from the Applicant's outlined approach to stream relocation, warm spring destruction and selenium in the Ohinemuri River.	Hydrology/Geohydrology/Water Management	-	Refer to statement provided by Mr Ian Boothroyd, appended as **Appendix P.**
304a	The impacts on the Warm Spring, the Mataura Stream, the Ruahorehore Stream, the Headwaters Gully stream, the TBI (tributary ?) at Northern Rock Stack are all matters of concern. The ability to restore these waterways to their optimum is nil.	Hydrology/Geohydrology/Water Management	-	Refer to statement provided by Mr Ian Boothroyd, appended as **Appendix P.**
304b	Dr Joy places emphasis on the impacts of selenium.	Geochemistry/Hazardous Substances	-	Refer to statement provided by Mr Ian Boothroyd, appended as **Appendix P.**
305	Concern around the use of USEPA levels that are less robust for measuring selenium.	Geochemistry/Hazardous Substances	-	Refer to statement provided by Mr Ian Boothroyd, appended as **Appendix P.**
295	Concerns that the scale of the dewatering, and the effect of this on the ecology and native species is likely to be significantly under-estimated. There are also concerns the mitigations proposed are questionable and may not be successful.	Hydrology / Freshwater Ecology / Terrestrial Ecology	**B.27 – WWLA – Wharekirauponga Groundwater Assessment, B.46 – Bioresearches – Wetland Ecology Effects Assessment**	The modelled hydrogeological data prepared by WWLA indicates that dewatering is not expected. Refer to statement provided by Ms Kate Feickert, appended as **Appendix T.**
295a	As a result of original wetland extent in the Coromandel area (2.8%) being lower than the national average remaining wetlands (approx. 10%), every small, forested wetland is even more significant in the area.	Freshwater Ecology	**B.46 – Bioresearches – Wetland Ecology Effects Assessment**	In accordance with the EIANZ guidelines (Roper-Lyndsey *et al.,* 2018) ecological values of the wetlands have been assessed against the 'Ecological District' scale rather than the national scale referenced. The applicant consider the scale utilised remains appropriate. This is discussed further in the statement provided by Ms Kate Feickert, appended as **Appendix T**.
295b	Potential adverse effects of dewatering on native frogs are grossly underestimated.	Terrestrial Ecology	-	Refer to the statement provided by Dr Graham Ussher, appended as **Appendix M.** Refer to the statement provided by Mr Dylan van Winkel, appended as **Appendix D.** Refer to the statement provided by Mr Brian Lloyd, appended as **Appendix J**. Refer to the statement provided by Ms Katherine Muchna, appended as **Appendix K.** Refer to the statement provided by Ms Helen Blackie, appended as **Appendix N.**
295c	Why is the B46 assessment limited to the 'Area of Investigation'. It is considered that impacts to wetlands may be wider than the Area of Investigation, with the Area of Investigation focusing on locations where effects were greatest.	Freshwater Ecology	**B.27 – WWLA – Wharekirauponga Groundwater Assessment, B.46 – Bioresearches – Wetland Ecology Effects Assessment**	The Area of Investigation was identified by WWLA through modelling of depth to groundwater and predicted drawdown information. Findings from modelling by WWLA show that impacts of dewatering are not expected. However, despite this, monitoring and effects management methodologies are proposed as a precaution, should any ecological impacts of dewatering be detected within wetlands. Refer to statement provided by Ms Kate Feickert, appended as **Appendix T.**
295d	That added pressure from dewatering may be impactful to swamp maire already impacted by myrtle rust.	Hydrology/Geohydrology/Water Management/Freshwater Ecology/Biodiversity	-	Refer to statement provided by Ms Kate Feickert, appended as **Appendix T.**
291	Residual effects on frogs remain uncertain and potentially irreversible.	Terrestrial Ecology	-	Refer to the statement provided by Dr Graham Ussher, appended as **Appendix M.** Refer to the statement provided by Mr Dylan van Winkel, appended as **Appendix D.** Refer to the statement provided by Mr Brian Lloyd, appended as **Appendix J**. Refer to the statement provided by Ms Katherine Muchna, appended as **Appendix K.**

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				Refer to the statement provided by Ms Helen Blackie, appended as **Appendix N.**
292	Mitigation relies heavily on adaptive management, which is reactive, not preventive.	Terrestrial Ecology	-	Refer to statement provided by Mr Stephen Christensen, appended as **Part 1.**
293	Offsets and compensation are proposed before avoidance is demonstrated, breaching best-practice environmental hierarchy.	Terrestrial Ecology	-	Refer to statement provided by Mr Stephen Christensen, appended as **Part 1.**
297	It is not considered there is enough information provided to understand if the offsetting can mitigate the adverse effects on the frog population.	Terrestrial Ecology	-	Refer to the statement provided by Dr Graham Ussher, appended as **Appendix M.** Refer to the statement provided by Mr Dylan van Winkel, appended as **Appendix D.** Refer to the statement provided by Mr Brian Lloyd, appended as **Appendix J**. Refer to the statement provided by Ms Katherine Muchna, appended as **Appendix K.** Refer to the statement provided by Ms Helen Blackie, appended as **Appendix N.**
294	Conditions are vague, broad, and not enforceable, contrary to requirements of the FTA Act.	Planning		The conditions have been prepared in response to the adverse effects of the proposal. They are aligned with standard practice and have been prepare with input from HDC, TCDC, WRC and the Department of Conservation.
294a	Pest control may take 5–10 years to show frog population benefits. Project effects (vent discharges, blasting vibration, noise/**light**) are immediate and potentially irreversible.	Pest Animal Management	-	It is agreed that the effects of light are immediate however would suggest that once the lighting is removed the effects are also removed.
294b	Reports assess dust, vibration, noise, **lighting**, hydrology largely in isolation.	Air Discharge/Blasting and Vibration/Noise/Lighting/Hydrology	-	The effects of lighting have been assessed but we are unable to comment on the impact of stacking multiple stressors.
294c	Terrestrial ecology: describes several stressors (**lighting**; drilling/heli noise; continuous vent-raise noise) as "localised, temporary and immediately reversible upon completion of works.	Terrestrial Ecology	-	The effects of lighting have been assessed but we are unable to comment on the impact of stacking multiple stressors.
294d	Nic Coland in reference to the Wharekirauponga Hydrology report asks for a sensitivity analysis showing how 7-day MALF reductions change under the 10–20% low-flow uncertainty and under alternative calibrations for Edmonds/Thompsons and to demonstrate that predicted effects remain below ecological significance thresholds.	Freshwater Ecology/Hydrology/Geohydrology	-	Refer to statement provided by Mr Tim Mulliner, appended as **Appendix E.**
294e	Mr Conland states "If fractures in this rhyolite zone provide pathways, mine pumping could draw down shallow streams much more severely than anticipated, threatening surface flows and biodiversity well outside the mapped area".	Hydrology/Geohydrology/Water Management	-	Refer to statement provided by Mr Chris Simpson, appended as **Appendix G.**
294f	Mr Conland cites "The B.33 report states in section 7.4.2 that dewatering effects cannot be accurately predicted at the time of the application".	Hydrology/Geohydrology/Water Management	-	Refer to statement provided by Mr Chris Simpson, appended as **Appendix G.**
294g	Mr Conland's evidence and specifically his statement "experience elsewhere shows short-term localised losses through fractured rock can be severe".	Hydrology/Geohydrology/Water Management	-	Refer to statement provided by Mr Chris Simpson, appended as **Appendix G.**
294h	Mr Conland states "The proposed Water Management Plan relies on "alert and respond" triggers, meaning damage may occur before interventions kick in. Quarterly reporting is far too infrequent to detect rapid stream declines."	Hydrology/Geohydrology/Water Management	-	Refer to statement provided by Mr Chris Simpson, appended as **Appendix G.**
294i	Mr Conland states "A global less-than-minor conclusion sits beside a mapped 1.2 km area where the protective andesite cover is absent and vein–stream connectivity could occur—prompting more intensive monitoring. That is a residual risk zone, not de minimis."	Hydrology/Geohydrology/Water Management	-	Refer to statement provided by Mr Chris Simpson, appended as **Appendix G.**
294j	Mr Conland states "The proponent's own conceptual model says Warm Spring effects "cannot be accurately predicted" now, while effects reports assume predictable cessation/recovery (and even "improved" quality during mining).	Hydrology/Geohydrology/Water Management	-	Refer to statement provided by Mr Chris Simpson, appended as **Appendix G.**

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294k	Mr Conland puts a number of comments to the panel.	N/A	-	Refer to statement provided by Mr Chris Simpson, appended as **Appendix G.**
294l	Mr Conland states “Even small unanticipated leaks could drain wetlands or headwaters, with changes appearing suddenly and irreversibly.”	Hydrology/Geohydrology/Water Management/Freshwater Ecology	-	Refer to statement provided by Mr Chris Simpson, appended as **Appendix G**.
294m	Mr Conland says at paragraphs 27- 30 of his evidence that offsetting has been prioritised ahead of avoidance and that this ‘undermines ecological integrity’	Terrestrial Ecology/Freshwater Ecology	-	Refer to statement provided by Dr Graham Ussher, appended as **Appendix M.**
294n	Mr Conland says at paragraphs 31-33 of his evidence that the delay in providing benefits after impacts undermines the credibility of a ‘net gain’ position	Economics	-	Refer to statement provided by Dr Graham Ussher, appended as **Appendix M.**
294o	Mr Kendal raises or infers apparent issues with how net-gain is communicated or calculated, and whether parts of the pest management programme are additional or not.	Pest Animal Management	-	Refer to statement provided by Dr Graham Ussher, appended as **Appendix M.**