



Competing Interests and Completeness check for project under the Fast Track Approvals Act 2024

Macraes Phase 4, FTAA-2608-1288

Contact Details	
Organisation Name	Heritage New Zealand Pouhere Taonga (HNZPT)
Contact person	HNZPT Fast-track Team
Contact Number	[REDACTED]
Email	[REDACTED]

Introduction

1. Oceana Gold (New Zealand) Limited (the Applicant) have lodged a substantive application for Macraes Phase Four (the Project) with the Environmental Protection Agency (EPA).
2. On 10 September 2026 the EPA requested feedback regarding completeness to determine whether the substantive application complies with section 46(2) of the FTA Act.
3. HNZPT has also undertaken a check for competing applications to assist in determining if there are any competing applications or existing resource consents under section 47 of the FTA Act.

Consultation

4. Prior to the submission of their substantive application to the EPA, the applicant provided the draft archaeological assessment prepared by Origin Heritage to HNZPT for comment. HNZPT responded on 24 June 2026 setting out general comments on the archaeological assessment, as well as more detailed comments within the word version of the archaeological assessment draft.
5. Most of these comments have been addressed through on-going consultation and have resulted in revisions to the archaeological assessment submitted as part of the substantive application (B.43.1 Archaeological Assessment (Origin Heritage) PART ONE, B.43.2 Archaeological Assessment (Origin Heritage) PART TWO) and B43.3 Archaeological Assessment excl. Appendices (Origin Heritage) PART THREE. However, there remain outstanding issues, which are addressed below.

Completeness Check

6. HNZPT **does not** consider the application to be complete, for the following reasons:
7. While there is a description and location for each recorded archaeological site to which the application relates included in the archaeological assessment (as required in Schedule 8 Clause 2 (1)(e) of the FTAA), the description of the Chinese Miner's Camp (I41/50) is lacking a clear understanding of the extent of the site. This impacts the ability to assess how the proposed activity will modify or destroy this site and the effect it will have on the values of I41/50 (as required in Schedule 8 Clause 2(1)(g) and (h) of the FTAA)



8. HNZPT recommended during consultation prior to lodgement, and remains of the opinion that, consideration should be given to other methodologies to inform the understanding of the Chinese Miner's Camp (I41/50) including a small-scale exploratory excavation to better identify and assess the impacts of the proposed works.
9. There is an assessment of the archaeological, Māori, and other relevant values of the archaeological sites included in the application, however this is not in the detail appropriate to the proposed modification and destruction of archaeological sites as required in Schedule 8 Clause 2(1)(h) of the FTA Act.
10. Schedule 8, Clause 7(5) of the FTA Act sets out the information required for approval of a person to carry out activity set out in Schedule 8, clauses 7(1) and 2(b). Russell Cook has been identified as the proposed person. However, no evidence has been supplied to demonstrate he has sufficient skill and competency to carry out the activity under the proposed authorities. HNZPT requests that Mr Cook submits a CV setting out his experience relevant to the nature of the project as well as the proposed archaeological works.
11. HNZPT is open to further discussion with both the applicant and their archaeological consultants to clarify the points raised above, if requested.

Competing Interests Check

12. HNZPT confirms that there are no current competing archaeological authority applications under the HNZPT Act 2014 that relate to the same activity and site.