

OCEANAGOLD (NEW ZEALAND)
LIMITED

MACRAES PHASE FOUR (MP4)

EROSION AND SEDIMENT CONTROL

Evidence of Gregor McLean Regarding
Preparation of Erosion and Sediment
Control Management Plan

INTRODUCTION

1. My name is Gregor McLean
2. My role in relation to Macraes Phase 4 (“**MP4**”) has been to provide expert advice in relation to Erosion and Sediment Control. I oversaw the Erosion and Sediment Control Management Plan (“**the Management Plan**”) which is provided within *Part C – Management Plans* of the application.
3. This evidence has been prepared to accompany the Management Plan and the application by Oceana Gold (New Zealand) Limited (“**OGNZL**”) for approvals required for MP4 under the Fast-track Approvals Act 2024 (“**FTAA**”).
4. Section 4.1(h) of the FTAA Panel Conveners’ Practice and Procedure note (July 2025) says all technical experts authoring reports should include a statement regarding compliance with the Code of Conduct for Expert Witnesses. This evidence has been prepared to fulfil this requirement, and if a hearing is not held, this evidence confirms that, relative to my area of expertise the Report provides an appropriate description of the relevant environment, the proposed activities comprising the effects of the MP4 on that environment, and the way those effects are proposed to be managed.
5. My findings are set out in full in the Erosion and Sediment Control Management Plan included within *Part C – Management Plans* of the application.
6. While this application is not being considered by the Environment Court, I confirm that I have read the Code of Conduct for expert witnesses contained in the Environment Court of New Zealand Practice Note 2023 and that I have complied with it when preparing the Report. Other than when I state I am relying on the advice of another person, the Report is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

QUALIFICATIONS AND EXPERIENCE

7. I hold a Bachelor of Arts (Planning/ Geography) from Massey University and a Post Graduate Diploma in Resource Studies from Lincoln University. I am a Certified Professional in Erosion and Sediment Control (7628) and a Registered Soil Practitioner: Erosion and Sediment Control.
8. I am currently employed as an environmental consultant and have held that position since 2002.
9. My previous work experience includes

- a. Provided advice to public and private sector clients about environmental projects including erosion and sediment control, chemical flocculation and adaptive management.
 - b. Provided advice to public and private sector clients on the preparation of resource consent applications, environmental management plans, flocculation management plans and erosion and sediment control plans.
 - c. Developed and delivered International Erosion Control Association 'Approved' Erosion and Sediment Control training courses to contractors, consultants and councils throughout New Zealand since 2012
 - d. Independent erosion and sediment control expert appointed to the Board of Inquiry for the Transmission Gully project.
 - e. Co-author of the Erosion and Sediment Control Guideline's for State Highway Infrastructure for the New Zealand Transport Agency (August 2010), Scientific basis for Erosion and Sediment Control Practices in New Zealand for Tasman District Council (2016), and a contributing author of the guideline document GD05 2016/005 which is titled the Erosion and Sediment Control Guide for Land Disturbing Activities in the Auckland Region (June 2016).
10. In providing this evidence, I have considered the following matters as relevant to that topic:
- (a) The Macraes Phase 4 Project Erosion and Sediment Control Report prepared by EGL (August 2026) ("**the EGL report**").

CONFIRMATION OF CONTENTS OF MANAGEMENT PLAN

11. The EGL Report refers to the MP4 project description and provides an assessment of the effects on the environment and based on the EGL Report the Management Plan details the erosion and sediment control methodology, monitoring and future reporting requirements.
12. I confirm that in my opinion the Management Plan contains an accurate and appropriate description of the recommended actions to control and monitor potential erosion and sediment control associated with MP4
13. I confirm that in my opinion the contents of the Management Plan may be relied on in making a decision on the approvals sought for MP4, and that the Management Plan does not lead to effects which will be unacceptable and will be managed to a standard that I consider meets good practice.



Gregor McLean

Dated this 4th day of September 2026