

IN THE MATTER of the Fast-track Approvals Act 2024 (the
Act)

AND

IN THE MATTER of an application made under the Fast-
Track Approvals Act 2024 by Matakanui
Gold Limited (Santana Minerals)

STATEMENT OF EVIDENCE OF SANDRA MCINTYRE (PLANNING) ON
BEHALF OF KĀTI HUIRAPA RŪNAKA KI PUKETERAKI, TE RŪNANGA O
MOERAKI, TE RŪNAKA O ŌTĀKOU, AND HOKONUI RŪNANGA (KĀ
RŪNAKA)

7 SEPTEMBER 2026



HOLM | MAJUREY

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INTRODUCTION

1. This evidence responds to the proposed conditions as circulated 28 August 2026.

CONDITIONS REVIEW PROCESS

2. In July and August this year I participated, on behalf of Kā Rūnaka, in conditions review workshops arranged by Matakanui Gold Ltd (**MGL**).
3. The workshops discussed versions of the proposed conditions that had been revised to incorporate amendments made as a result of earlier conferencing and hearing processes. Between the first and last workshops further revised versions of the conditions were circulated, and these, together with MGL responses to RFI 11 and Minute 40, formed the basis of the later workshops. The timing of information circulation and workshops is set out in **Attachment 1**.
4. The usefulness of the workshops depended on the need for the parties involved to absorb the substantial volume of information in the condition sets, as well as updates to this information and the additional material provided by MGL in response to RFI 11 and Minute 40.
5. In the later stages of the process, the short time available between circulation of the information and the commencement of workshops to discuss that information made it challenging to absorb and assess the information. This was particularly the case for aspects where the opinion of technical advisors was needed to confirm the appropriateness of conditions.

Statement on limitations of the process

6. Kā Rūnaka participated in good faith in the workshop process to assist the panel despite reservations regarding tight timeframes, the outstanding information requests and its potential impact on the drafting of conditions. My comments on the proposed conditions below should be seen in the context of the following significant limitations on the outcomes of the process:
 - (a) The focus of the workshops was on improving the effectiveness of conditions for monitoring and compliance

purposes. The scope did not include discussion of larger concerns about the merits of the proposal or the appropriateness of the proposed outcomes. The significant concerns of Kā Rūnaka about the failure of the proposal to address cultural effects remain.

- (b) Given the volume and complexity of the information provided during the workshop process, including the applicant's response to RF11, and the limited time available to review it, we have not been able to fully consider all proposed changes to conditions. This is particularly the case for the Schedule One Common Conditions relating to ecological rehabilitation and terrestrial ecology.

PROPOSED CONDITIONS

- 7. Overall, I consider that the amendments made through the workshop process have improved the clarity and certainty of the conditions. In particular, the environmental outcomes and the "bottom line" standards and requirements to be achieved by the suite of management plans are more clearly stated and identified gaps in these have been addressed.
- 8. The intent of these changes has been to ensure that the focus in the management plans is clearly directed by the conditions, rather than the content of the management plans directing the content of the conditions. In my opinion this is crucial to ensure that the consent authorities can carry out their certification responsibilities effectively.
- 9. I note that due to the timeframes for review, our ability to check that the key requirements from the management plans are included in the conditions has been very limited.
- 10. The need for provision of significant volumes of information at this stage of the process to clarify and/ or address gaps is concerning for a project on this scale and presents a key risk to the effectiveness of conditions in managing the effects on te taiao. The feedback provided by the technical advisors of all parties will be important in assisting the Panel to assure themselves that remaining gaps and uncertainties have been addressed.

11. The memorandum from the applicant's planning consultant filed with the revised conditions refers to there being "only a relatively small number of outstanding matters remaining" in dispute in the conditions. This statement must be seen in the context of the limitations on the condition review process I have highlighted above. As previously expressed by Kā Rūnaka, there are significant cultural and environmental concerns that arise from the design of the project itself, and that cannot be addressed by conditions and management plans.

Mana Whenua Conditions

12. Kā Rūnaka considered that the conditions originally proposed by MGL, which were formulated without input from Kā Rūnaka, were inadequate and inappropriate. I drafted alternative conditions which were endorsed by Kā Rūnaka with the qualifier described in the memorandum provided to the Panel on 21 August. I can confirm that these conditions have been accepted in full by MGL, except for an agreed change to the name of the Group that is provided for in the conditions.
13. A further amendment was discussed and agreed in the final conditions workshop to ensure that the role of mana whenua in respect to any proposed species re-introductions is appropriately provided for. This is included as Condition C25(a)(iv) in the conditions filed by MGL on 28 August.

Landscape and Ecological Rehabilitation Management Plan conditions

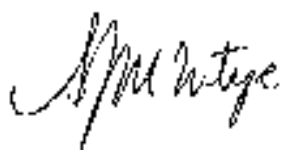
14. In reviewing the final version of the Schedule One Common Conditions, I have identified one further amendment to the landscape and ecological rehabilitation conditions to reflect the inclusion of the revised mana whenua conditions.
15. Condition C35 (Landscape Objectives) includes the following objective in clause (e): "*identify and respond to cultural values including mana whenua*". This clause is unclear. It suggests a lack of understanding of mana whenua values and a focus that is not apparent in the Landscape and Ecological Rehabilitation Management Plan. As Ms Rā and other witnesses for Kā Rūnaka have previously stated, the management plan does not respond to

mana whenua values. I recommend that clause (e) be deleted in favour of the process set out in the mana whenua conditions.

16. The mana whenua conditions include provision for a baseline cultural health assessment and development of a Cultural Health Programme. The intent of this is to start to address the gap in the MGL assessments and management plans. I consider that this will provide a more appropriate means of responding to the cultural effects of the proposal, including the ability for mana whenua to shape any such response.

SUMMARY

17. In summary, I consider that the amendments in the revised conditions filed by MGL on 28 August have improved the clarity and certainty of the conditions, particularly those relating to the suite of management plans. However due the limitations of the process, the final feedback provided by the technical advisors of all parties will be important in assisting the Panel to assure themselves that remaining gaps and uncertainties have been addressed. The conditions and management plans are also not capable of addressing the significant cultural and environmental concerns that arise from the design of the project itself.
18. The revised mana whenua provisions, while not able to address the significant concerns of Kā Rūnaka about the effects of the proposal, have been endorsed by Kā Rūnaka as providing more appropriately for an ongoing role of mana whenua in management of te taiao in the area affected by the Project.



Sandra McIntyre

Attachment 1: Timing of information and workshops

22 June	Revised conditions set
22 July	First tranche RFI 11 response (bond, long-term management, economic)
27-31 July	First condition workshop (Common conditions and CODC conditions, excluding matters awaiting RFI 11 response) – I attended full workshop, with support from Mark Pizey for discussion of bond conditions
5-7 August	Second condition workshop (ORC conditions, excluding matters awaiting RFI 11 and Minute 40 response) – I attended workshop 5-6 August
15 August	Conditions updated to incorporate amendments and re-work requested in first and second workshops (some rework incomplete)
18 August	Minute 40 and second tranche RFI 11 response
19-20 August	Third condition workshop (ORC conditions linked to RFI 11 and Minute 40 response) – I attended full workshop
21 August	DOC workshop (Wildlife authority, concessions, conditions relating to: covenant, biodiversity and heritage fund) – Matt Dale attended wildlife authority discussion; I attended discussion of conditions covenant and biodiversity/ heritage fund
22 August	Full updated conditions
26-27 August	Final condition workshop – I attended full workshop
28 August	Conditions filed