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Buller Plateaux Continuation Project Fast Track Approval Act Application

PEER REVIEW OF SOCIAL IMPACT ASSESSMENT

Prepared by Julie Boucher

April 2026

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Executive Summary

1. My name is Julie Boucher and I am a Certified Social Impact Assessment Practitioner and Principal – Social Sustainability and Planning at Just Add Lime Limited.
2. I have undertaken an independent peer review of the Social Impact Assessment (SIA) prepared for the Buller Plateaux Continuation Project (BPCP).
3. In my opinion, the SIA is of a good standard overall. It broadly follows recognised good practice as it has substantial regard to the New South Wales Social Impact Assessment Guideline and is generally consistent with international SIA principles. It is framed within the New Zealand statutory and cultural context and the requirements of the Fast Track Approvals Act 2024 (FTAA). I consider the methodology to be appropriately impartial, transparent and rigorous.
4. The SIA has been prepared using a clear and credible assessment framework. It draws on mixed social science methods, uses both primary and secondary data, includes stakeholder and community engagement, establishes a social baseline, and assesses impacts across the project lifecycle. It also applies a significance matrix and social risk assessment and assesses the Project against a “no project” scenario, being mine closure in March 2027 which provides a basis for understanding and comparing the likely social consequences of the Project proceeding, or not proceeding.
5. The SIA is generally sound in its identification and description of social impacts. It identifies a range of direct and indirect, positive and negative effects, reflects the perspectives of those engaged in the SIA. I agree with the SIA note that there is potential bias in the selection of stakeholders for engagement and views of opposing, vulnerable, and marginalised groups have not been fully explored in engagement. Engagement feedback used in the SIA is also based on views about the existing Stockton mine operations generally and did not specifically address potential social impacts or mitigation measures of the BPCP.

6. Impact identification and assessment is less developed in relation to how impacts may differ for vulnerable groups such as low-income households, renters, older people, disabled people, solo parents or others with limited resilience to disruption.
7. The prediction and analysis of social impacts has been undertaken to a good standard overall. The SIA identifies significant positive social impacts associated with continuation of existing employment opportunities, income, community resilience as a result of community contributions made by the project, and maintenance of community stability from employees' and their families contribution to the community through employment and volunteering. These impacts are expected during the operation phase of the BPCP.
8. It also identifies significant negative social impacts which are expected to result from effects on the physical environment and include impacts on recreational use, people's ability to engage with values associated with sense of place, and health and wellbeing benefits.
9. The SIA is weaker in impact management, mitigation and measurement. While a range of mitigation and management measures are already being implemented via existing operation of the Stockton Mine and the SIA recommends additional management and mitigation measures, the SIA does not provide a robust social impact management framework. It does not consistently set out indicators, targets, triggers, responsibilities, monitoring frequencies or reporting requirements. Many measures are described at a high level or deferred to other technical reports, future consultation, conditions or later plans.
10. In my view, the SIA is reasonably strong in identifying what needs to be managed and how, but weak in explaining how that management will be monitored, evaluated and adapted over time.
11. I support the recommendations made by the SIA for the BPCP to manage social impact/social risk and in to those I recommend the BPCP consider:
 - (a) Establishing a system that allows reporting of complaints (including confidential and/or anonymous complaints), maintains a complaints

register, and reports the subject and outcome of investigations resulting from complaints to be published on the website quarterly or six-monthly.

- (b) Developing a strategic community investment plan that supports employees and the local community over the duration of the BPCP to prepare for their eventual transition away from economic dependence on mining.
 - (c) Preparing a Social Impact Management Plan (SIMP) that includes all mitigations and enhancement measures with a framework for how these will be managed, monitored and reported, at least annually, to ensure the risk of social impacts is managed over the life of the project.
 - (d) Providing additional information on the website on a regular basis, reporting implementation of mitigation and management measures, progress with remediation/rehabilitation, monitoring results, and status of impact indicators to improve the transparency of activities.
12. Subject to continuing existing mitigation measures, implementation of the recommendations in the SIA, and adoption of the additional recommendations set out in this review, I consider it likely that the social impacts identified in the SIA can be managed in ways that are reliable, effective and trustworthy.

Introduction

13. My full name is Julie Boucher. I am the Principal - Social Sustainability and Planning Consultant at Just Add Lime. I have over 25 years' experience in engagement, planning, project management and social impact assessment in New Zealand and Australia.
14. This technical assessment addresses the draft Social Impact Assessment proposed for the Buller Plateaux Continuation project and provides an independent review of the social impact aspects of the Project.

Qualifications and experience

15. I have the following qualifications relevant to this assessment:
- (a) Master's Degree in Social Sciences (Geography);
 - (b) Postgraduate Diploma in Resource and Environmental Planning.
16. I am a full member of the New Zealand Planning Institute (MNZPI) and a Certified Environmental Practitioner - Social Impact Assessment (CEnvP-SIA), accredited by the Environment Institute of Australia and New Zealand (EIANZ). My certification (No. SIA90003) is current to October 2026 and requires continuing professional development and compliance with the EIANZ Code of Ethics.
17. I have also been involved in the development of Social Impact Assessment (SIA) policy and guidelines in New Zealand and Australia, the development of the CEnvP SIA Accreditation Scheme, and the development of a Social, Environmental and Economic Assessment framework for a state transport agency in Australia.
18. I am a licensed trainer with the Engagement Institute, delivering IAP2 Certificate training across New Zealand and Australia, and until March 2026, when my tenure ended, I was a Director on the International Board of IAP2 representing Australasia.
19. I am a member of:
- (a) The New Zealand Planning Institute (NZPI)
 - (b) The International Association of Public Participation (IAP2)
 - (c) The Environment Institute of Australia and New Zealand (EIANZ)
 - (d) The International Association for Impact Assessment (IAIA).
20. I have worked in transportation, resources, defence, aviation and education sectors within both New Zealand and Australia. I have both led and contributed to Social Impact Assessments and the development of Social Impact Management Plans for a range of projects including

transport corridors; proposed coal, gold and rare earth mines; railway and electricity corridors; marine farming operations; and wastewater treatment optioneering.

21. My recent experience includes the following relevant projects:
- (a) Preparation of the Social Impact Assessment for the Mill Road Stage 1 Project
 - (b) Guidance in the preparation and peer review of a Social and Economic Impact Assessment for Rio Tinto's New Zealand Aluminium Smelter
 - (c) Guidance in the preparation and peer review of the Social Impact Assessment for the MACH Energy Mt Pleasant Mine in NSW
 - (d) Preparation of the Social Impact Assessment for Auckland Light Rail
 - (e) Preparation of the Social Impact Assessment for the Airport to Botany Rapid Transit Project
 - (f) Preparation of the Social Impact Assessment for the Takaanini Level Crossings Project.

Code of conduct

22. I confirm that I have read the Code of Conduct for expert witnesses contained in the Environment Court Practice Note 2023. This assessment has been prepared in compliance with that Code, as if it were evidence being given in Environment Court proceedings. In particular, unless I state otherwise, this assessment is within my area of expertise and I have not omitted to consider material facts known to me that might alter or detract from the opinions I express.

Purpose and scope of assessment

23. The purpose of this assessment is to provide an independent review of and comment on the Social Impact Assessment for the Buller Plateaux Continuation Project.

Assumptions and exclusions in this assessment

- 24. No other technical reports or impact assessments for this project were supplied for review, including those referred to in the SIA.
- 25. Because the cultural values assessment has not been completed and stakeholder engagement is ongoing, this review considers the SIA as it is presented and assumes that information regarding social impacts and management/mitigation measures gained in future engagement and assessment will be appropriately integrated into the Project and mitigation planning and implementation.
- 26. The SIA acknowledges that there may be or have been some actual or perceived selection bias with respect to identifying some of the parties involved and notes this is a limitation of any sample-based research method.

The Buller Plateaux Continuation Project

- 27. A description of the Project is provided in Section 5 of the AEE. I do not repeat it in my assessment.

Methodology for this Review

- 28. My approach has been to review the documents provided including the project description and SIA Report to develop an understanding of the likely social and environmental effects of the project across its lifecycle (construction, operation and closure), consider whether the extent and nature of the effects have been correctly and fully assessed, documented and addressed, and determine whether the proposed management (including if applicable offset/compensation measures) appropriately address the impacts of the construction, operation and closure of the project.
- 29. The report reviewed is the Social Impact Assessment, Buller Plateaux Continuation Project Fast Track Approval Act Application, dated 24 March 2026, prepared by Dr Mark Sargent.

30. The SIA Report states that it is guided by the NSW Government SIA Guideline, but prioritises the requirements under the Fast Track Approvals Act 2024 (**FTAA**). Accordingly, this review considers the FTAA requirements while providing opinion in line with objectivity, transparency, and robustness standards as per the NSW guideline.
31. Schedule 5, Section 7 of the FTAA requires the following matters to be covered in an assessment of environmental effects in relation to effects on people and communities: (emphasis added):
- 7(a) any effect on the **people in the neighbourhood and, if relevant, the wider community, including any social, economic, or cultural effects**:*
- 7(d) any effect on natural and physical resources that have **aesthetic**, recreational, scientific, historical, spiritual, or cultural value, or other special value, for present or future generations:*
- 7(g) any risk to the **neighbourhood, the wider community**, or the environment through natural hazards or hazardous installations.*
32. A SIA undertaken in accordance with recognised guidelines is considered an appropriate assessment to meet the above requirements.
33. Publicly available information about the project, the community, and the industry has been sourced and considered in this peer review.

Comment on the SIA Methodology

34. I consider the methodology to be appropriately impartial, transparent and rigorous.
35. The SIA has been developed with reference to the NSW Government SIA Guideline and follows the process outlined in that guideline including the significance methodology for assessment. The SIA describes the methodology, primary and secondary data sources, and limitations of these. The SIA also acknowledges that requirements under the FTAA were the prevailing consideration for this SIA.
36. Reference to the NSW Social Impact Assessment Guideline is supported as a supplementary good-practice framework because it provides a clear

and contemporary method for identifying, assessing, mitigating and monitoring the social impacts of major extractive projects. It is particularly relevant to coal mining because it has been developed in a jurisdiction with substantial experience of mining-related social effects, including cumulative and long-duration community impacts. In the SIA the NSW guidance is not treated as determinative. It is used alongside international SIA principles and New Zealand practice, and has been adapted to the New Zealand statutory, cultural and community context.

37. The SIA is based on a combination of social science research methods, including primary and secondary source research and modelling of different project outcome scenarios. Secondary source material includes demographic data and other supporting material in relation to defining the social areas of influence for the Project, explaining the application of social impact assessment practices and presenting supporting evidence from relevant sources.
38. The research also included several programs of engagement with a range of Westport, BPCP Buller primary and West Coast secondary regional area stakeholders, and specific interested stakeholder groups. The engagement methods used included structured and unstructured interviews, workshops, and community 'drop in' information sessions. Project-specific engagement was also undertaken with various stakeholder groups, representing a broad range of interests in the Project.
39. It has been appropriately acknowledged that there may be or have been some actual or perceived selection bias with respect to identifying some of the parties interviewed.
40. A range of social science research methods were used in undertaking the SIA including interviews and surveys, workshops and focus groups, modelling of different scenarios, comparative studies and trend extrapolation.

Community Engagement

41. The extent and nature of engagement activities are reported in annexure 6 of the SIA and reflect a range of methods used with a range of

stakeholders and community representatives with the intention for each to contribute to a collective, representative view of how parts of the community view Bathurst, including:

- (a) Bathurst workforce
- (b) West Coast Regional Council and its three constituent territorial authority areas
- (c) Other infrastructure and service providers
- (d) Iwi representatives
- (e) Development West Coast
- (f) Community organisations eg heritage groups
- (g) Potentially affected landholders
- (h) Business community representatives
- (i) Representatives of interest groups such as regular users of the Plateaux
- (j) Environmental groups such as the Environmental Defence Society.

42. While the SIA includes feedback from engagement with environmental groups and notes ongoing engagement with iwi, the views of opposing, vulnerable, or marginalised groups have not been fully explored in engagement. The SIA acknowledges that there may be or have been some actual or perceived selection bias with respect to identifying some of the parties involved and this is a limitation of any sample-based research method.

43. A statistical summary of matters raised in stakeholder interviews is included and references to stakeholder feedback are included throughout the report.

44. It is noted that the purpose of stakeholder interviews was to investigate Stockton Mine operations generally and interviews did not specifically

address the BPCP or its potential impacts on people or communities. Where stakeholder feedback is considered in identification, description, and assessment of impacts, it is based on the current operation and does not include impacts resulting from any new or changed activities on new or changed sites for the BPCP.

Comment on Identification and description of social impacts

45. In considering the identification and description of potential social impacts it is expected the SIA:
- (a) describes likely social impacts from the perspectives of how people may experience them, and explains the research used to identify them.
 - (b) demonstrates the application of the precautionary principle to identifying social impacts, and consider how they may be experienced differently by different people and groups.

Perspectives

46. The SIA identifies and describes a range of impacts across social impact categories including direct and indirect, positive and negative impacts.
47. Primary and secondary data sources used to identify impacts are explained, and references to stakeholder and community feedback (both supportive and critical) is included in the description of impacts, noting that as a continuation of an existing operation, impacts are largely known and understood within the communities.
48. The perspective of local employees and small businesses of maintaining economic activity in the region is acknowledged, particularly in relation to employment and the continued viability of local services and facilities.
49. Social impacts identified and assessed in other reports such as the Recreation and Tourism Assessment and Traffic and Transport Assessment are reported in the SIA. It is important to note that the social

impacts identified in the SIA are not additive to the impacts identified in technical reports but represent stakeholder and community views on the potential effects of those impacts on them. This is an important distinction to ensure that in assessing the potential materiality of the Project's social costs and benefits, those costs and benefits are not "double counted", having been addressed in other specialist technical reports.

50. Impacts as a result of perceptions are partially addressed in the SIA and there are some limitations regarding the identification of impacts relating to different perceptions about existing and future mining operations and potential impacts, for example:
- (a) For small, relatively remote and less resourced communities, community cohesion is essential for individual and collective resilience to natural and economic events. If people perceive a lack of community cohesion, they may not ask for help when they need it, or offer help to other people in the community. This is a potential social impact of the mining operation that leaves disabled people, elderly people, solo parents and people living alone particularly vulnerable to severe weather events and/or economic hardship.
 - (b) People who support mining AND people who oppose mining in the community may experience a loss of trust or faith in community, social, and political institutions as a result of polarisation, politicisation, and perceived unfair processes, regulations, or behaviours. They may cease participating in local elections, for example, if they perceive that local campaigning has been unfair or manipulative as a result of discourses around mining and this project. This is a potential impact on people's decision making as a result of the project.

Precautionary principle

51. The SIA does incorporate the precautionary principle at a methodological level and applies it in a reasonably clear way. It expressly refers to the precautionary principle and the uncertainty principle, and states that uncertainty should not be a reason for avoiding mitigation or monitoring

where there are potential serious social impacts. It also adopts the IAIA position that project effects are not uniformly positive or negative and that costs and benefits are distributed differently across communities.

52. The SIA also recognises that social impacts may be experienced differently by different people and groups, although this is developed more strongly by place and stakeholder interest than by a detailed social equity analysis. For example, it identifies that impacts are particularly concentrated in Westport, distinguishes between local plateau users who may experience tangible impacts and more geographically dispersed groups who may experience intangible “non-use” concerns, and specifically notes the interests of Te Rūnanga o Ngāti Waewae, recreational users and heritage groups. It also identifies that a temporary construction workforce may place pressure on rental housing in Westport and recommends continued monitoring of accommodation capacity as construction nears.
53. The assessment is less developed in relation to how impacts may differ across particular vulnerable population groups, such as low-income households, renters, older people or other socially vulnerable cohorts, so its treatment of differential experience is present but not comprehensive. Impacts described in terms of change in demand, a perception, or a contribution, are describing changes to baseline conditions not impacts, which involve a change in behaviour, material circumstances, or lived experience of a person or group of people.

Comment on Prediction and analysis of social impacts

54. Prediction and analysis of social impacts has been undertaken to a good standard overall. It follows an expected formal assessment framework by including a significance matrix and social risk assessment, using mixed social science methods, and by assessing impacts against a ‘no project’ scenario being mine closure in March 2027. It also integrates specialist technical material and does not duplicate it, which is consistent with the expectation that analysis should translate environmental and economic changes into impacts on people.

55. The assessment is stronger on geographic distribution than on social distribution across groups such as renters, low-income households, older people, children or other vulnerable cohorts.
56. The SIA provides assessment and qualitative commentary and context about likely social impacts to people and communities with reference to different phases of the project (construction, operation and post-mining)
57. The SIA identifies construction phase impacts as potential reduced availability and/or increased cost of short term accommodation as a result of the temporary workforce. An audit of local accommodation is provided, indicating sufficient accommodation exists in Westport. Additionally, the contribution of the construction workforce to the local economy is thought likely to balance any increase in accommodation cost. The SIA assumes the market will respond to any extra demand for services (eg retail/supermarkets) as a result of the temporary construction workforce.
58. During the Operation phase, livelihood impacts (impacts to employment opportunities and income) are assessed as most significant whether the BPCP goes ahead or not. The SIA analyses the distribution of both positive and negative impacts and identifies employees of the mining operation and their households as likely to experience the most benefits of the BPCP, with the wider community also experiencing the benefits of maintained economic activity, community stability, employee contributions to the community including emergency services, and resourcing for schools.
59. The SIA assesses and compares impacts of the BPCP against impacts of a "no project" scenario and finds the project will create more positive benefits than the "no project" scenario, with benefits concentrated in the Westport local and BPCP Buller primary regional area, and substantial benefits also for the BPCP West Coast Regional Council secondary regional area.
60. Positive social impacts of the BCPC found to have high or very high significance are:

- (a) Employment effects direct (375 workers) and indirect, and the social and economic stability supported by the incomes of these workers.
 - (b) Short term local and regional social and economic effects of the construction workforce
 - (c) Bathurst Community support contributions, cash and in-kind
 - (d) Employee contributions to community organisations and activities
 - (e) Regional and district emergency operations contributions
61. Negative social impacts of the BCPC found to have high or very high significance are:
- (a) Recreational use impacts
 - (b) Positive social impacts of the BCPC not proceeding found to have high or very high significance are:
 - (c) Ecological, physical, and operational impacts of mining on plateaux sites
 - (d) Long term plateaux impacts (eg post-mining final landforms and use)
62. No negative social impacts of the BCPC not proceeding were found to have high or very high significance.
63. The SIA considers relevant findings from other technical reports for the BCPC, (traffic and transport, recreation and tourism, ecology/ biodiversity, air quality, noise, visual impacts, and archaeological and historic heritage) and considers that social impacts relating to these have been addressed satisfactorily in the relevant reports. This approach is consistent with Section 85(3) of the FTAA. [CW1.1]
64. Potential cumulative positive impacts include ongoing benefits of continued employment, community contributions, community cohesion and resilience. Specific mitigation measures may also create cumulative

impacts eg supporting the development of longer term structures to manage plateaux visitation and use.

- 65. Potential cumulative negative impacts include effects on the physical environment including the final landform, and people's ability to engage with values attached to it.
- 66. Overall, the cumulative impacts of the BPCP are assessed as similar to those of the existing operation but will be experienced over the longer duration proposed in the BPCP. The SIA concludes that the net cumulative impacts will be positive at regional and national level.

Comment on Impact management, mitigation and measurement

- 67. Impact management, mitigation and measurement has been undertaken to a moderate standard overall.
- 68. It is expected that a SIA will outline management and mitigation measures for both positive and negative impacts, explain how they will be implemented, specify when and where measures apply, explain how effectiveness will be monitored and maintained, and, where appropriate, include measurable performance criteria and management objectives. Residual impacts are also expected to be monitored and managed over the life of the project, and for higher-uncertainty projects to include a SIMP framework with desired outcomes and monitoring indicators.

Mitigation and management

- 69. The SIA cites project level mitigation and management measures included in the project proposal such as continuous remediation/ rehabilitation works (including historic/legacy mining impacts) and a compensation and offset package to address residual impacts of the project. The SIA assumes this package will address the public interest and adequately reflect the scale of residual impacts in context of the benefits produced by the project.

70. Social impacts during the operational phase, including environmental effects, are said to have been satisfactorily addressed in other technical reports, ie: traffic and transport, tourism and recreation, biodiversity/ ecology, water resources, air quality, noise, and visual impacts through approval conditions structured to address specific impacts and ongoing engagement. These include access arrangements for user groups, traffic management plans, and ongoing engagement.
71. The SIA proposes a mitigation for opposition to the project is for Bathurst to continue making information publicly available about the management of effects of operations. There is no reference to a complaints management system.
72. Social impacts of the temporary workforce during the construction phase will be managed by BPCP, including monitoring adequacy of local accommodation capacity, and maintaining engagement with Buller District Council and other community stakeholders to monitor effects.
73. Based on continuation of existing impacts, the mitigations in the SIA are likely to be tangible, deliverable, durably effective, directly related to the respective impacts, and adequately delegated or resourced.
74. The SIA makes the following recommendations for the BPCP to manage social impact/social risk, which I support:
- (a) Bathurst should commit to continuing its community support activities in their various forms to maintain Social License to Operate (SLO).
 - (b) Bathurst should actively maintain the communications channels established with stakeholders during project development to facilitate communication around matters of mutual interest that may arise during the project.
 - (c) Bathurst should undertake advocacy to improve understanding about the use of metallurgical coal and its contribution to social and economic sustainability at regional and national levels.

- (d) Community sentiment monitoring should be undertaken by BPCP through established communications channels.
 - (e) BPCP should monitor impact of temporary construction workforce accommodation needs during construction phases of the BPCP.
 - (f) BPCP should adopt mitigation measures identified in other technical reports that have social impact implications.
75. In addition to the above, it is recommended the BPCP consider:
- (a) Establishing a system that allows reporting of complaints (including confidential and/or anonymous complaints), maintains a complaints register, and reports the subject and outcome of investigations resulting from complaints to be published on the website quarterly or six-monthly.
 - (b) Developing a strategic community investment plan that supports employees and the local community over the duration of the BPCP to prepare for their eventual transition away from economic dependence on mining.

Monitoring and reporting

76. The SIA does not set out a robust, clearly measurable social impact management framework. It does not include a clear Social Impact Management Plan (SIMP) framework, nor does it consistently provide defined indicators, baseline values, triggers, frequencies, responsibilities or targets for monitoring and review. Many mitigation measures are described at a fairly high level or are deferred to other technical reports, future consultation, conditions or other plans, rather than being translated into clear social management commitments within the SIA itself.
77. While the SIA is reasonably sound on identifying mitigation themes and recommending monitoring, it does not present expectations for concrete, measurable, adaptive social impact management.

78. The SIA makes the following recommendation for the BPCP regarding monitoring and reporting which I support:
- (a) Monitoring should be included as part of the mitigation proposals to ensure the risk of social impacts is managed over the life of the project.
79. In addition, it is recommended the BPCP consider:
- (a) Preparing a Social Impact Management Plan (SIMP) that includes all mitigations and enhancement measures with a framework for how these will be managed, monitored and reported, at least annually, to ensure the risk of social impacts is managed over the life of the project.
 - (b) Providing additional information on the website on a regular basis, reporting implementation of mitigation and management measures, progress with remediation/rehabilitation, monitoring results, and status of impact indicators to improve the transparency of activities.

Summary

80. I have reviewed the Social Impact Assessment, evaluated the methodology used to assess social values and likely effects, and assessed the likely outcomes of the mitigation, offset and compensation actions proposed.
81. Overall the SIA is of a good standard. It generally meets the requirements of International Guidelines and has had substantial regard to the NSW SIA Guideline.
82. The SIA is strong in adopting the NSW social impact categories, using mixed social science methods, applying a defined “project versus no project” case, and including a baseline profile, stakeholder engagement, impact prediction, a significance matrix, a social risk assessment and recommendations. It also follows the guideline’s broad expectation that SIAs should integrate with other specialist studies rather than duplicate them, with the SIA explaining that it translates effects identified in

technical reports into the social consequences for people and communities.

83. The SIA is weaker in considering distributive equity, cultural responsiveness, transparency, lifecycle focus and adaptive management, and specific attention to vulnerable groups, disaggregated analysis where groups are affected differently. There is no robust monitoring and reporting framework.
84. Based on community feedback presented in the SIA which reflects people's experience with the existing operation to date, by maintaining existing management and mitigation measures and adopting the recommendations in this peer review, it is likely that people can be confident that the social impacts assessed in the SIA will be managed in ways that are reliable, effective, and trustworthy.

Julie Boucher

April 2026

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Buller Plateaux Continuation Project Fast Track Approval Act Application

ADDENDUM TO PEER REVIEW OF SOCIAL IMPACT ASSESSMENT

Prepared by Julie Boucher

June 2026

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Purpose of this Addendum

1. This addendum has been prepared in response to the updated Social Impact Assessment (SIA) for the Buller Plateaux Continuation Project dated May 2026. It should be read together with my April 2026 peer review of the SIA dated 24 March 2026.
2. This addendum does not replace the April 2026 peer review. The May 2026 SIA includes Annexure 7 which is a response to the April 2026 peer review, and includes references to specific paragraphs in that review. In order to maintain the relevance of those references, any comments regarding the May 2026 SIA are included in this addendum.
3. The purpose of this addendum is to identify whether the changes made in the May 2026 SIA materially alter the conclusions or recommendations of my April 2026 peer review.
4. In preparing this addendum, I have considered the following documents:
 - (a) Social Impact Assessment, Buller Plateaux Continuation Project Fast Track Approval Act Application, dated 24 March 2026, prepared by Dr Mark Sargent
 - (b) My Peer Review of the Social Impact Assessment for the Buller Plateaux Continuation Project dated April 2026
 - (c) The updated Social Impact Assessment, Buller Plateaux Continuation Project Fast Track Approval Act Application, dated 26 May 2026, prepared by Dr Mark Sargent
 - (d) Cultural Impact Assessment Buller Plateaux Continuation Project prepared by Te Rūnanga o Ngāti Waewae.
5. I have not undertaken a review of the Cultural Impact Assessment prepared by Te Rūnanga o Ngāti Waewae. My comments on cultural values in this addendum are limited to how the May 2026 SIA has incorporated and responded to that assessment.

Summary of review

6. The May 2026 SIA maintains broadly the same overall structure, methodology, assessment framework and principal conclusions. The main changes relate principally to the project description and temporal assumptions, incorporation of cultural values material from the Cultural Impact Assessment, updates to the discussion of Ngāti Waewae matters, changes to the social risk assessment for cultural values, updates to cumulative effects discussion, and the inclusion of a new Annexure 7 responding to matters raised in my April 2026 peer review.
7. These changes improve the SIA particularly in relation to improved clarity of the project description, transparency of response to April 2026 peer review comments, and consideration of cultural values.
8. The changes do not materially alter my overall conclusion that the SIA is of a good standard, broadly follows recognised good practice, and provides a credible basis for identifying and assessing the likely social impacts of the Project. There is no change to my recommendations relating to impact management, mitigation and measurement.

Changes between the March SIA and the May SIA

Project description and temporal assumptions

9. The May 2026 SIA provides a more detailed description of the components of the Buller Plateaux Continuation Project and explains the role of existing and proposed infrastructure more clearly than the March 2026 version.
10. The May 2026 SIA also clarifies the relationship between the 16-year production period used for assessment purposes and the broader approximately 20-year timeframe for construction and mining operations identified in the Assessment of Environmental Effects. It further notes that decommissioning, remediation and rehabilitation would occur after the end of mining and prior to site relinquishment.

11. This further detail helps explain the SIA more clearly, but has no impact on the peer review findings.

Cultural values and Ngāti Waewae matters

12. The most significant change between the March 2026 and May 2026 versions of the SIA relates to cultural values. The March 2026 SIA noted that a Cultural Impact Assessment (CIA) was being prepared and that social impacts associated with cultural values were not fully assessed. The May 2026 SIA refers to a CIA prepared by Te Rūnanga o Ngāti Waewae and includes additional discussion of Ngāti Waewae priorities and a range of issues including ongoing engagement, cultural values, mahinga kai, biodiversity, stream impacts, rehabilitation of lands and waters, and a proposed Accidental Discovery Protocol.
13. This change improves the completeness of the SIA.
14. The May 2026 SIA also changes the risk assessment treatment of cultural values with an assessment having now been undertaken and the SIA noting a positive assessment with the Project, subject to the mitigation, compensation, protocol and engagement measures identified. This is a material improvement in the assessment record. It is however noted that there are impacts on a range of cultural values and the positive assessment does rely on the implementation of mitigation measures as outlined in the CIA.
15. In my opinion, the May 2026 changes mean the updated SIA is stronger in cultural responsiveness than the March 2026 version. However, the effectiveness of this improvement depends on whether the commitments to ongoing engagement with Ngāti Waewae, adoption of the Accidental Discovery Protocol, and implementation of practical mitigation and compensation measures are implemented, monitored and reported over the life of the Project.
16. It is noted that in Section 9 of the CIA that Ngāti Waewae “*remains of the view that provided the proposed mitigation and compensation package is implemented as intended, the project can be supported.*”

Community engagement and social distribution of impacts

17. The May 2026 SIA, including Annexure 7, provides additional explanation in response to the peer review comments about engagement. In particular, it distinguishes between earlier engagement about Stockton Mine operations and project-specific engagement undertaken for the Buller Plateaux Continuation Project. This clarification improves the transparency of the engagement record.
18. The May 2026 SIA continues to be stronger in describing geographic distribution of impacts across Westport, Buller District and the West Coast Region than in describing how impacts may be experienced differently by groups with varying levels of resilience, including low-income households, renters, older people, disabled people, solo parents or others with limited capacity to absorb disruption or housing pressure. It is acknowledged that engagement has continued following completion of the SIA, and further reporting on this will be included in the BPCP AEE.
19. Annexure 7 notes that *“because the BPCP would essentially entail similar socioeconomic impacts to existing operations, it is considered as unlikely that the circumstances of any specific groups within the community would be materially, differentially impacted by the BPCP, should consent be granted.”* This may be the case, however it does not significantly change the peer review finding that the views of opposing, vulnerable or marginalised groups have not been fully explored.
20. The peer review comments on distributive equity and vulnerable groups remain unchanged, acknowledging the additional explanation provided in the May 2026 SIA.

Cumulative impacts and social risk assessment

21. The May 2026 SIA updates the discussion of cumulative impacts, including by incorporating additional material relevant to Ngāti Waewae and cultural values. The summary of cumulative impacts is also reframed as a ‘net cumulative impact assessment’. These changes better explain the interaction between positive socioeconomic effects, adverse

environmental and cultural effects, and the longer-term implications of continued mining and eventual closure.

22. The changes to the cumulative impact and social risk assessment sections do not materially alter my overall peer review conclusions. The SIA continues to identify substantial positive social impacts associated with continued employment, income, community participation, regional business activity, emergency response capacity and community stability. It also continues to identify adverse social impacts associated with environmental effects, recreation, access, sense of place, cultural values, landscape and long-term plateau effects.

Response to peer review and impact management

23. The inclusion of Annexure 7 in the May 2026 SIA provides a clear response to matters raised in the peer review and demonstrates that the author of the SIA has considered the review comments. This improves the transparency of the assessment process and assists in understanding how review matters have been addressed.
24. Annexure 7 of the May 2026 SIA comments on recommendations of the April 2026 peer review relating to impact mitigation and management, including acknowledging the recommendations made are appropriate.¹
25. Further explanation regarding the potential preparation of a Social Impact Management Plan (SIMP) is provided in response to a recommendation in the April peer review². It is acknowledged that this is usually a post-approval activity and an example of the structure of a SIMP has been provided. While this information is helpful, there remains no commitment to develop a SIMP therefore the recommendation a SIMP be developed remains, should the project be approved. This is considered best as a condition on any approval should it be granted.
26. The April 2026 peer review recommendations regarding a complaints system, strategic community investment plan and regular public

¹ Refer paragraph 75 of the April 2026 peer review

² Refer paragraph 79(a) of the April 2026 peer review

reporting should also be retained. The May 2026 SIA acknowledges these recommendations, and outlines how they are being managed at present via a range of standards and policies, some existing and some under development. Annexure 7 recommends that when complete, the standards and policies should be applied to the BPCP. This is supported. However, acknowledgement and recommendation is not a commitment, and for that reason my recommendations regarding these issues remain and these measures should be incorporated into a consent conditions should approvals be granted.

Summary

27. Having reviewed the May 2026 SIA, including the Annexure 7 response to my April 2026 peer review, I conclude that the changes made since the March 2026 version improve the SIA, but do not materially alter the conclusions of my April 2026 peer review. The most important improvement is the incorporation of cultural values material from the Cultural Impact Assessment and the revised treatment of Ngāti Waewae matters. The updated project description, timing clarification, cumulative impact discussion and Annexure 7 response to the peer review are also positive improvements.
28. Subject to the qualifications set out in this addendum, my April 2026 peer review remains current. I continue to consider the SIA to be of a good standard overall. I also continue to recommend that the Project prepare a clear SIMP or equivalent framework, supported by measurable indicators, triggers, monitoring, reporting, complaints management, strategic community investment and adaptive management arrangements. This would be a post-approval activity and therefore appropriate as a condition on any approval that might be granted.
29. These measures would provide greater confidence that the social impacts and benefits identified in the SIA can be managed, monitored and reported in a reliable, effective and trustworthy way over the life of the Project.

Julie Boucher

June 2026