

5. CONSULTATION AND ENGAGEMENT

5.1 OVERVIEW

In accordance with section 29 (1)(a) and (b), Schedule 5 (clause 6 (1)(e)), Schedule 6 (clause 3 (1)(k)), Schedule 7 (clause 2 (1)(n)) and Schedule 8 (clause 2 (1)(i)) of the Act, this section provides details of the consultation and engagement undertaken by MGL with relevant administering authorities, iwi and other stakeholders.

Section 1.7 of this report sets out MGL's approach to consultation and engagement. MGL initiated consultation with key stakeholders and the community on various elements of the project when exploration commenced. As the project has developed into a commercial discovery, MGL has sought to continue consultation with these stakeholders and the community whilst the technical assessments were still being scoped and prepared, to allow adequate time for stakeholders concerns to be identified, accounted for, and addressed in the relevant technical assessments.

An important part of the extensive consultation programme has been building positive relationships with iwi, key stakeholders and the community. It is these relationships that MGL are looking to maintain and enhance for the duration of the BOGP.

MGL has utilised a range of methods to support the consultation, including:

- > Meetings to discuss the BOGP, provide updates and discuss the scope and status of technical assessments;
- > Community group presentations about the project;
- > Holding drop-in sessions and attending various community events to provide information on the project and respond to any questions or concerns;
- > Operating a community email inbox to receive and respond to questions about the project;
- > Site tours with nearby landowners, interested parties, education providers, and relevant recreation groups; and
- > Monthly radio interviews on Radio Central, which is a local station which covers the entirety of Central Otago and the Wakatipu Basin.

A summary of the consultation undertaken, and key concerns raised during consultation, is outlined in full in the Engagement Report provided in **Part F** to these application documents and summarised in the sections below.



5.2 LOCAL AND ADMINISTERING AUTHORITIES

5.2.1 Overview

Section 29 of the Act requires applicants for substantive applications to consult with the relevant local and administering authorities prior to lodging an application with the Environmental Protection Authority (“**EPA**”). In the case of the BOGP, the applicable local and administering authorities are:

- > Central Otago District Council (“**CODC**”);
- > Otago Regional Council (“**ORC**”);
- > Department of Conservation;
- > Ministry for Culture & Heritage and Heritage New Zealand Pouhere Taonga (“**HNZPT**”);
and
- > Ministry for the Environment.

Details of the consultation with these parties is provided in the sub sections below.

5.2.2 Central Otago District Council

MGL recognises the importance of working with the local community to create opportunities, build resilience and leave a positive, long-lasting legacy well beyond the mining lifecycle. To achieve this, it was paramount that CODC (as the consent authority, a relevant landowner for several roads within the Project Site and a roading authority) was involved with project development from the outset.

MGL has established a strong working relationship with CODC representatives and has endeavoured to keep these communication channels open throughout the pre-lodgement consultation period.

A number of meetings have been held with CODC, including:

- > Project overviews and updates, including regular monthly meetings where matters such as access routes and early works were discussed;
- > A site visit to understand location, scope, and visibility of the BOGP within the district;
and
- > The circulation and discussion of a draft rules assessment with CODC to provide details on what activities would be permitted, and why, and what land use consents would likely be triggered by the project that will be sought to be approved under the Act.



During these meetings, CODC raised the following matters:

- > Lack of accommodation within the surrounding areas to support the housing influx required to construct and operate the BOGP;
- > The capacity to review technical documentation within the timeframes prescribed by the Act; and
- > The importance of community engagement.

MGL have worked to share technical assessments with CODC as they are finalised to enable early peer review ahead of the application lodgement. Following this, MGL have been working with and providing information in response to CODC's review of the technical assessments, a process which is on-going.

MGL provided formal written notice to CODC on 27 May 2025 of MGL's intention to apply for all approvals necessary to authorise the BOGP under the Act (a copy of which is provided in **Part F** to these application documents). This letter included a request for written notice from CODC that there are no existing consents to which 124C(1)(c) or 165ZI of the RMA would apply if the BOGP were to be applied for as a resource consent under the RMA (as per Section 30(3) of the Act).

Written notice was provided by CODC on 19 June 2025, confirming that there are no existing consents to which 124C(1)(c) or 165ZI of the RMA would apply (provided in **Part F** to these application documents). Subsequent to this, on 29 September 2025, an updated letter was sent to CODC where they were asked to re-confirm that in accordance with section 30(3) of the Act, there are no existing consents to which sections 124C(1)(c) or 165ZI of the RMA would apply if the BOGP were to be applied for as a resource consent under the RMA. CODC has since replied on 10 October 2025 confirming that to be the case.

5.2.3 Otago Regional Council

MGL recognises the importance of designing the BOGP in a way that promotes the protection, preservation, conservation and enhancement of air, water, soil and ecosystems, as well as the natural character of the Inland Otago area. To achieve this, it was paramount that the ORC was kept informed of the BOGP development from the outset.

MGL has held regular meetings with members of the ORC to provide information on the project, and to inform their understanding of the work to be carried out and potential mitigation methods.



These meetings included:

- > Project overviews and updates, including regular monthly meetings;
- > A site visit to understand location, scope, and visibility of the BOGP from surrounding areas;
- > Presentations to discuss the GIS software (Felt) that was used to design the BOGP; and
- > The circulation and discussion of a draft rules assessment to provide details on what activities associated with the BOGP would be permitted, and why, and what regional consents would likely be triggered by the project that will be sought to be approved under the Act.

During these meetings, ORC raised concerns regarding the timeframes available for reviewing technical documentation under the Act process. In response to this, MGL has proactively shared reports with ORC to enable early peer review and facilitate informed input ahead of lodgement.

MGL provided formal written notice to CODC on 29 May 2025 of MGL's intention to apply for all approvals necessary to authorise the BOGP under the Act (a copy of which is provided in **Part F** to these application documents). This letter included a request for written notice from ORC that there are no existing consents to which 124C(1)(c) or 165ZI of the RMA would apply if the BOGP were to be applied for as a resource consent under the RMA (as per Section 30(3) of the Act).

Written notice was provided by ORC, confirming that there are no existing consents to which 124C(1)(c) or 165ZI of the RMA would apply (provided in **Part F** to these application documents).

5.2.4 Department of Conservation

MGL has been open and transparent with the Department of Conservation with respect to its intention to apply for the necessary authorisations required to develop the BOGP and undertake several activities within land administered by the Department of Conservation (noting none of these activities are for mining operations).

MGL has held meetings with the Department of Conservation regional team to obtain exploration drill permits - and ensure that the disturbance and associated rehabilitation is compliant - as well as providing information on the BOGP as it has been developed and confirmed.



With respect to the BOGP itself, the following engagement has been undertaken with the Department of Conservation:

- > Regular meetings with the Department of Conservation regional team to discuss project updates, site activity and regulatory matters;
- > A site visit with Department of Conservation to monitor disturbance and rehabilitation activities associated with exploration drilling;
- > Regular email correspondence to provide updates on the site reporting and the progress of the current disturbance applications, and subsequent updates through presentations;
- > Invitations to the resource management team and technical experts to introduce the BOGP;
- > The circulation of technical reports to enable early peer review of the application;
- > A pre-lodgement meeting to address matters relevant to the Department of Conservation's role in the Act process and discuss alignment with the information requirements under the Act;
- > Further meetings to discuss wildlife, terrestrial invertebrates and lizards; and
- > A meeting regarding the scope of the concessions and other applications within the Department of Conservation's administrative jurisdiction that will be applied for as part of this substantive application under the Act.

MGL provided formal written notice to the Department of Conservation on 29 May 2025 of its intention to apply for all approvals necessary to authorise the BOGP under the Act (a copy of which is provided in **Part F** to these application documents).

The Department of Conservation will be involved in the fast-track approvals process at several points post the lodgement of the substantive application, including:

- > The EPA's completeness assessment (section 46 (1) of the Act) and subsequent functions in the processing of the substantive application (section 90 of the Act);
- > The Convener's decision to fix any non-default timeframe for the issue of the Panel's decision documents (section 79 (2)(c) of the Act);
- > Reports for the Panel as specified in the Act (section 51 of the Act) or that the Panel considers necessary (section 67 of the Act);
- > Comments on the substantive application (section 53 (2) of the Act); and
- > Comments on conditions (section 70 of the Act).



5.2.5 Ministry for Culture and Heritage and Heritage New Zealand Pouhere Taonga

MGL engaged with HNZPT to provide an overview of the BOGP, which included a meeting with the Otago / Southland Office of HNZPT in May 2024. Following this meeting, a progress meeting and subsequent site visit was undertaken with MGL.

MGL provided formal written notice to the Ministry for Culture and Heritage and HNZPT on 28 May 2025 of its intention to apply for all approvals necessary to authorise the BOGP under the Act (a copy of which is provided in **Part F** to these application documents).

The Ministry for Culture and Heritage and HNZPT will be involved in the fast-track approvals process at several points post lodgement of the substantive application, including:

- > The EPA's completeness assessment (section 46 (1) of the Act) and subsequent functions in the processing of the substantive application (section 90 of the Act);
- > The Convener's decision to fix any non-default timeframe for the issue of the Panel's decision documents (section 79 (2)(c) of the Act);
- > Reports for the Panel as specified in the Act (section 51 of the Act) or that the Panel considers necessary (section 67 of the Act);
- > Comments on the substantive application (section 53 (2) of the Act); and
- > Comments on conditions (section 70 of the Act).

MGL offered the Ministry for Culture and Heritage and HNZPT the opportunity to receive a briefing on the BOGP prior to the lodgement of the substantive application. The Ministry for Culture and Heritage confirmed that a pre-lodgement briefing for the BOGP was not required. They noted that they defer to HNZPT as the agency responsible for administering the archaeological authority under the HNZPT Act and encouraged that MGL continue to work closely with HNZPT.

5.2.6 Ministry for the Environment

MGL provided formal written notice to the Ministry for the Environment on 28 May 2025 of its intention to apply for all approvals necessary to authorise the BOGP under the Act (a copy of which is provided in **Part F** to these application documents).

The Ministry for the Environment will be involved in the fast-track approvals process at several points post lodgement of the substantive application, including:

- > The EPA's completeness assessment (section 46 (1) of the Act) and subsequent functions in the processing of the substantive application (section 90 of the Act);



- > The Convener’s decision to fix any non-default timeframe for the issue of the Panel’s decision documents (section 79 (2)(c) of the Act);
- > Reports for the Panel as specified in the Act (section 51 of the Act) or that the Panel considers necessary (section 67 of the Act);
- > Comments on the substantive application (section 53 (2) of the Act); and
- > Comments on conditions (section 70 of the Act).

MGL offered the Ministry for the Environment the opportunity to receive a briefing on the BOGP prior to the lodgement of the substantive application, however no briefing subsequently occurred.

5.3 ENGAGEMENT WITH TANGATA WHENUA

MGL has engaged with mana whenua through Aukaha since inception of the BOGP, prior to the amalgamation of several mineral exploration permits into MEP60311 in 2018. Aukaha is a mana whenua-owned organisation that delivers services across the takiwā of their Papatipu Rūnaka shareholders.

The Crown Minerals Act (“**CMA**”) and regulations set out that Tier 1 exploration and mining permit holders are required to submit an Iwi Engagement Report each year with their Annual Summary Reports (“**ASR**”). MGL has met and continues to meet this requirement for MEP60311 permit. Each year the draft of the iwi engagement report has been shared with Aukaha on behalf of iwi (in accordance with section 33C(2A) of the CMA)), providing them a reasonable opportunity to comment on the draft report before its submission. The final report is then filed including any comments provided by iwi on the draft report in accordance with section 33C(2B) of the CMA.

Subsequent to a field visit on site with mana whenua and Aukaha representatives in 2017, a Cultural Values Statement (“**CVS**”) with associated maps and protocols for accidental discovery were issued (**Part F**), for the exploration being undertaken on the freehold Bendigo Stations and Ardour Stations.

This CVS also recommended a Memorandum of Understanding (“**MOU**”) be entered into to provide a process for consultation throughout the development of the Project. In November 2018, Aukaha acknowledged that mana whenua would like to enter into an MOU and in July 2019 a draft Memorandum of Engagement (“**MOE**”) was presented. In March 2020 a Protocol of Engagement (“**POE**”) reached final draft.

Subsequently in February 2021, iwi communicated to MGL that they would prefer not to formalise the POE, but *“prefer to agree in the spirit of trust and co-operation that both parties (Kā Rūnaka and Matakanui Gold Ltd) keep the lines of communication open on the*



progression of the exploration projects". MGL accept this decision and iwi engagement since that time has been undertaken in general accordance with the POE, by keeping lines of communication open.

In 2023, engagement with iwi stepped up as technical reports on the scale of the project were published. In May 2023 a formal letter of engagement was signed by both MGL and mana whenua. In August 2023, MGL management met with Aukaha staff in their Ōtepoti Dunedin office to present the July 2023 corporate presentation that outlined the history, discovery and pathway to permitting. In person meetings were supplemented by virtual meetings. In March 2024, a further meeting in Aukaha's office was held to understand Aukaha's availability over the following weeks to visit the site while the ecological and hydrological fieldwork was underway. This site visit was undertaken in April 2024.

At the same time, engagement with nominated senior members of four runanga resulted in the drafting of a Process Agreement in August 2024 between MGL and the Seven Papatipu Rūnanga, of Te Rūnanga o Ngāi Tahu that have interests in the project: Te Rūnaka o Moeraki, Kāti Huirapa Rūnaka ki Puketeraki, Te Rūnaka o Ōtākou, Hokonui Rūnanga, Te Rūnaka o Awarua, Te Rūnaka o Awarua and Waihōpai Rūnaka, collectively known as Kā Runaka. Ka Rūnaka parties together share mana whenua status over the Ōtākou-Otago and Murihiku-Southland regions reflecting their intergenerational connections to this whenua.

The Process Agreement enabled the establishment of a steering committee (komiti) consisting of representatives of the four rūnaka of Mata-au/Clutha: Te Rūnaka o Moeraki, Kāti Huirapa Rūnaka ki Puketeraki, Te Rūnaka o Ōtākou, Hokonui Rūnanga. The komiti had oversight of Aukaha and other consultants engaged by Kā Runaka to review MGL's technical reports. Aukaha was to maintain briefings to its counterparty Te Ao Mārama, a mana whenua owned consultancy of Murihiku-Southland.

Korero with the komiti included provision of all preliminary technical reports for review and discussions around the consent application and the Fast Track Approval process. A shared platform was created to enable easy access to relevant technical documents, and communication remains active and collaborative.

In August 2025, the majority of the Board of Santana Minerals Limited met with representatives of Kā Rūnaka at Tamatea Marae near Ōtepoti-Dunedin for a mana-to-mana hui. This meeting covered cultural context, environmental and cultural interests, heritage and legacy, cultural mapping, history working with mining companies and the importance of relationship building and the approach taken when assessing projects. It also covered the partnership opportunities and reinforced MGL's intention to be transparent, build understanding and acknowledge the importance of a strong relationship.



Subsequent to the hui, Kā Rūnaka has re-iterated its connection with the whenua, subsequent alienation due to actions enabled by the Crown and, through such legislation such as the Ngāi Tahu Claims Settlement Act 1998 (NTCSA), recognition by the Crown of the importance of the broader area to Kā Rūnaka through the statutory acknowledgements of the Mata-au (Clutha River) and of Wairere (Lake Dunstan). Furthermore, Kā Rūnaka believe the parts of the MGL's application under the FTAA fail to acknowledge Kā Rūnaka and their interests. MGL hold the position that they have made an extensive effort over many years for meaningful engagement and that constructive discussions with Kā Rūnaka remain ongoing.

MGL engaged Aukaha to prepare a Cultural Impact Assessment (“**CIA**”) that:

- > Provides mana whenua with an overview of the project and environmental context;
- > Enables Aukaha to assess the key information from the application and the proposed restoration or remediation plans and to provide technical advice to inform assessment of the project by mana whenua;
- > Identifies mana whenua associations, history, and values associated with the area;
- > Identifies key issues and cultural impacts of the project; and
- > Provides recommendations to address the effects and cultural impacts of the project, where that is possible.

The unendorsed, draft report was not to be seen as Kā Rūnaka approval of this project, but as a basis for ongoing engagement and discussion between Matakanui and Kā Rūnaka in the context of this Project.

Kā Rūnaka has made the following statements of their position on the BOGP in the unendorsed draft CIA, based on the four core values of mana, mauri, tapu and whakapapa, and captured during the various wānaka with whānau.

Mana

Kāi Tahu continue to practice mahika kai, despite the history of loss. We have seen a resurgence in our people re-establishing their connections to our whenua and waterways, and breathing life into long held cultural practices. It is our aspiration to re-establish habitat for taoka species and to improve water quality to support mahika kai practices. For reconnection to be successful, social and economic sustainability for whānau is also necessary as well as a healthy environment.

Mauri

The word mauri refers to the life essence found in all things, relating to its nature, appearance, and vitality. For mana whenua, the mauri of the environment is a direct reflection of the health and wellbeing of whānau and communities.



Protection of the mauri of wai māori is a significant priority for Kā Rūnaka, due to its life-giving properties and as a vital component of the living world of te taiao. The presence and health of indigenous flora and fauna is an expression of the mauri of the natural environment in an area.

Mana whenua apply the principle of utu, giving back more than is taken, as a means of protecting mauri. The right to take kai and extract resources from te taiao is balanced with the kaitiaki duty to care for, and nurture, the environment in return.

Tapu

The principle of tapu provides a guide for Kā Rūnaka to gauge the appropriateness of actions and behaviours in the context of the existing environment.

It is the position of Kāi Tahu that the Project is significantly tapu in this location, due to the location of the proposed pit lakes, waste rock storage and tailings storage in the tributaries of the Mata-au, including the diversion of Shepherds Creek to construct tailings storage.

Whakapapa

After generations of loss and disconnection from the whenua, creating opportunities to reconnect with the whenua is now more important than ever. The potential long-term risks associated with the Project to wāhi tīpuna, taoka species and wai māori risks undermining the efforts of whānau to restore the whenua and rekindle connections and mahika kai practices.

MGL has actively engaged with Kā Rūnaka and continues to negotiate on a number of cultural participation, acknowledgement, consultation and commercial requests from Kā Rūnaka which are prescribed in quantum and discussions remain in progress. There is high-level agreement in principle around matters of partnership to Deliver On a Vision of Abundance and to address in terms of the views of Kā Rūnaka, mitigation of the environmental, cultural and socio-economic effects, and compensation for any residual cultural effects.

MGL will continue work with Kā Rūnaka in good faith to ensure that the BOGP is developed and managed in a manner that is sensitive to the cultural requirements of the mana whenua.

Suffice to say that Matakanui believes it has fulfilled its pre lodgement consultation obligations under the FTA and requests that its FTA application be accepted as complete and provided to the Panel Convener on those grounds whilst discussions with Kā Rūnaka are progressed and resolved.

It is noted that, in accordance with section 53 (2)(b) and (c) of the Act, relevant iwi authorities and Treaty settlement entities have the opportunity to provide written comments on the substantive application, once it has been received by the Panel.



5.4 GOVERNMENT AGENCIES

5.4.1 New Zealand Transport Agency Waka Kotahi

MGL has engaged with New Zealand Transport Agency Waka Kotahi (“**NZTA**”) to understand the potential effects of the project on the safe and efficient functioning of the transportation network.

Stantec was engaged by MGL to assess the traffic and transportation effects associated with the BOGP, and both Stantec and MGL have directly engaged with NZTA throughout the drafting of this assessment.

Consultation was undertaken in late 2024 and early 2025 to discuss the proposed access routes for the BOGP Project Site and any upgrades required to the SH8 / Ardgour Road intersection. Furthermore, in May 2025, NZTA were provided a copy of the integrated transportation assessment prepared by Stantec for review. Following this review, NZTA requested the following upgrades / measures be included within the transportation assessment to manage the potential adverse effects on the safe and efficient operation of SH8 at the Ardgour Road intersection:

- > Construction of a right-turn bay from SH8 into Ardgour Road;
- > Widening of Ardgour Road to ensure two-way movements of trucks can take place;
- > Roadside barrier changes, flag lighting and signage to be determined through detailed design and in consultation with NZTA;
- > Implementation of a Project Traffic Management Plan; and
- > Undertake a safe system audit as part of the proposed upgrades to the SH8 / Ardgour Road intersection.

Following the updating of transportation assessment to include these measures (refer to Stantec (2025) provided as **Part B** to these application documents), MGL will continue to engage with NZTA Waka Kotahi to ensure planned upgrades meet their safety requirements.

5.4.2 Land Information New Zealand

MGL has engaged with Land Information New Zealand (“**LINZ**”) to discuss land tenure and access matters relating to the BOGP. Engagement has been ongoing since 2017 in relation to exploration activities and an access arrangement was signed in 2019 to allow for exploration access.

Engagement with LINZ is ongoing in relation to a 15m section of the proposed Ardgour Rise access route that traverses land administered by LINZ (Run 238N).



MGL is seeking LINZ's approval for the BOGP to undertake works on the LINZ-administered section. The project team has written to LINZ requesting approval, in its capacity as land administrator, for this section of Ardgour Rise to be upgraded.

5.5 ENVIRONMENTAL GROUPS

5.5.1 Fish & Game New Zealand

MGL has engaged with Fish & Game New Zealand ("**Fish & Game**"), to provide information of the Project and to understand Fish & Games area of interest. During this engagement, Fish & Game identified interest in the downstream water quality impacts and the potential effect on the fishing experience of Lake Dunstan.

To address these concerns, Fish & Game met with the surface water and groundwater experts to understand and discuss the surface water effects of the BOGP.

5.6 OWNERS OF BENDIGO STATION AND ARDGOUR STATION

As previously discussed, the BOGP is located on private farmland within the Bendigo and Ardgour Stations. Access agreements are in place with the owners of each station, and through these access agreements the landowners of each station support the project through to the completion of mining. MGL has also obtained signed APAs from the owners of each station which provide explicit support for this substantive application and any necessary approvals required under the Act. Communication is an integral ongoing component of the access agreements with both station owners and leaseholders. Copies of the redacted access agreements and the APAs are provided in **Part F** to these application documents.

5.7 OTHER STAKEHOLDERS AND MEMBERS OF THE COMMUNITY

5.7.1 Key Consultation Events and Forums

The Consultation Report provides a comprehensive overview of the consultation undertaken by MGL in respect of the wider Central Otago community. This has included:

- > Offering a community email address for questions, enquiries, and concerns. This is promoted on the Santana Minerals website, newsletters, and all external community advertisements;
- > Presenting information about the project at various community events, including the Central Otago and Wānaka A&P shows and Wheels at Wānaka. In summary, over 200 attendees visited the MGL stall at each event and answered questions, with the majority in support of BOGP;



- > A business pulse survey to understand the sentiment, concerns and aspirations of the business community in relation to the proposed mine;
- > Community drop-in sessions within the Cromwell and Tarras communities, which has included a total of 16 sessions in Taras and 50 sessions in Cromwell;
- > Meetings with affected residents and community groups and follow up communications which were facilitated by letter drops with requests for meetings;
- > Site tours undertaken with nearby landowners, interested parties, education providers, and as requested by several local recreation groups;
- > Parliamentary visits and official Government visits; and
- > The establishment of a Community Liaison Group (“**CLG**”) to promote communication and co-operation between the community and stakeholders.

5.7.2 Engagement Materials

As part of the consultation process, MGL has produced a series of engagement material to provide the public with information about the project. This has included:

- > A Santana Minerals website to provide information on the project, the company and the project team;
- > A monthly community newsletter named the “The Prospectors Post” that provides information and updates on the project, advertises drop-in sessions, explores the history of mining in the region and introduces members of the Santana Minerals project team;
- > Weekly advertising in local newspapers, including the ‘The Central App’, the ‘Cromwell Bulletin’ and ‘The Central News’; and
- > A monthly Q&A spot on Radio Central.

Full details of these engagement materials can be found in the Engagement Report.

5.7.3 Outcome of Community Consultation

The Consultation Report notes that the overall sentiment of the Cromwell community has been positive, with over 1,000 enquiries regarding potential job opportunities, supplier opportunities and general business opportunities. However, concerns have been raised about housing and the lack of available accommodation options in the region.

The Consultation Report notes the overall sentiment of the Tarras community has been mixed, with the community generally eager to be involved in the mining operations.



However, some members of the community have expressed concerns around water quality, potential tailings dam failure, potential landscape and visual, noise, dust and light effects and concerns around accommodation (as discussed further in Section 5.8 of this report).

5.8 SUMMARY OF FEEDBACK AND CONCERNS

The following sections provide a high-level overview of the feedback and concerns on the BOGP that have been expressed to MGL through the consultation and engagement process.

5.8.1 Accommodation

During the consultation, stakeholders often expressed concerns that the proposed increase in workforce numbers to support the project, combined with an already strained accommodation market within the area, could result in housing shortages, higher demand for rental properties, and increased living costs for existing residents.

In response to this, extensive consultation has been undertaken with local accommodation providers in Cromwell where participation proposals have been presented and investigated. As discussed throughout this report, a temporary construction workers camp is proposed to be located at the Ardgour Terrace Site for the duration of construction activities. In addition, MGL will provide transport to and from the Project Site to enable a wider range of accommodation options within an hour's drive in the surrounding towns of Wānaka, Queenstown and Alexandra.

5.8.2 Air Quality

Air Quality, and specifically dust, was raised as a potential impact of the BOGP by several stakeholders. These concerns have been responded through the commissioning of an Air Quality Report (provided in PDP (2025) in **Part B** of this application) and an associated Air Quality Management Plan (provided in **Part G**) which details the key measures that will be proposed to manage dust emissions. These measures include maintaining adequate buffer distances between large scale earthworks, ensuring adequate water supply and infrastructure for dust suppression and handling and stockpiling of material within low wind conditions wherever practicable.

As discussed in Section 6.18 of this report, PDP (2025) concludes that any adverse amenity effects on adjoining properties resulting from the discharge of dust from the Project Site will likely be less than minor and can be appropriately managed through the implementation of the Air Quality Management Plan.



5.8.3 Economics and Employment

A key theme of the consultation was who benefits from the profits generated from the BOGP. As part of its consultation, MGL has outlined that 60% of gross profits earned will remain within New Zealand, with additional revenue entering New Zealand through wages and local suppliers. This comprises of Crown and private royalties, central government corporate tax, and the fact that almost 40% of Santana Minerals shareholders are NZ residents.

As discussed in Section 6.2 of this report, further benefits not included in the 60% of gross profits will also accrue through the BOGP requiring the procurement of goods and services from across the Otago Region and wider New Zealand. Further details on the economic benefits of the project are provided in Benje Patterson (2025).

Furthermore, the project is expected to employ an average of 351 people, with an employment peak of 506 people in Year 1 as constructions activities are completed, and operations begin. Sourcing hundreds of workers will be a complex recruitment exercise, but the Inland Otago job market has previously demonstrated it can absorb such an employment lift. Workers have been attracted to Inland Otago to fill more than 18,000 new jobs over the past decade.

5.8.4 Tailings Storage

Questions were raised by stakeholders regarding the design of the TSF, specifically how the TSF will withstand an earthquake and how any ground seepage will be managed.

Some stakeholders also raised concerns with how the TSF will be built, maintained, and managed. Specifically, concerns were raised relating to the geological setting of New Zealand and any potential risks to the facilities structural integrity should a significant earthquake occur. Concerns were also raised about seepage from the TSF.

In response, the TSF has been designed in accordance with the NZ SOLD Dam Safety Guidelines and will safely contain tailings when subjected to potential future extreme earthquakes. Among a multitude of design specifications, the TSF will be designed to withstand a 1 in 10,000 year earthquake, which includes a potential rupture on the Alpine Fault or any other active faults in the region. The TSF has also been designed to manage seepage through a system of drains and structures that intercept water for reuse, including the use of seepage collection sump at the base of the TSF.

Over and above the requirements of the NZ SOLD Dam Safety Guidelines, the Project Site is arranged such that the TSF is further buttressed on its downstream face by the millions of tonnes of TZ3 and TZ4 schist to be placed in the Shepherds ELF.



5.8.5 Transportation

A number of local residents have raised concerns with potential increases in traffic movements within the road network surrounding the Project Site. These concerns also relate to heavy vehicle use, the rationale for selecting the access route, safety risks and dust generation. Concerns were also raised around the construction of roading upgrades and any associated disruption, and how resident access would be maintained.

As part of this engagement, MGL confirmed that access to properties will be maintained throughout the construction stage and residents will be escorted to their properties where required for safety purposes. In addition, MGL confirmed that all construction activities will be undertaken in accordance with a Project Traffic Management Plan (provided in **Part G** of these application documents) and any further temporary construction traffic management plans as required. Additional measures to address safety and amenity concerns include MGL requesting a reduced speed limit for Thomson Gorge Road from CODC, the implementation of company-wide vehicle speed limits and company transport (busses) to transport workers from surrounding areas.

5.8.6 Temporary Construction Camp

Concerns were raised by local residents, particularly those living along Thomson Gorge Road, regarding the proposed temporary construction camp, including:

- > The potential for drug and alcohol misuse by camp residents;
- > The possibility of anti-social behaviour; and
- > An anticipated increase in traffic volumes and vehicle speeds on Thomson Gorge Road.

To manage these matters MGL incorporate measures into the planning of the construction camp to proactively address them. These include:

- > A robust Drug and Alcohol Policy that applies to all employees, contractors, and site visitors. This includes regular testing protocols to ensure compliance and a safe working environment;
- > The implementation of company-imposed speed restrictions on designated access routes, including Thomson Gorge Road, to mitigate the risk of speeding and improve safety for local road users; and
- > The development of a Construction Camp Management Policy, which will clearly outline rules around alcohol consumption, visitor access, and acceptable behaviour within the camp.



These measures aim to provide assurance to the community that the construction camp will be well-managed, respectful of the surrounding environment, and aligned with the expectations of local residents and stakeholders.

5.8.7 Tourism

The Central Otago Winegrowers Associated and Sustainable Tarras (among other parties) raised concerns regarding the potential impact of the BOGP on the tourism industry. These concerns relate to the perception of the area being used for mining and the impact it may have on the wine industry, which is a key contributor to tourism in Central Otago. Concerns centred on potential visual impacts, dust, noise, and traffic, which are addressed within other sub-sections of this report. Regarding tourism specifically, MGL has engaged in initial discussions to create a mine and wine tourism experience to integrate the two activities.

It is expected that the BOGP will become a point of interest within a region and landscape that has a long history of gold mining. Otago's mining heritage is a key element of today's tourism industry in Central Otago and the BOGP is expected to be part of the next phase of that long history.

5.8.8 Recreation

A concern raised by stakeholders is the loss of recreation while a section of Thomson Gorge Road is close during the Project. This has been addressed through the construction of an alternative public road along Ardgour Road. In addition to this, the Come in Time stamper battery will remain accessible but by a longer walking route via the Bendigo Historic Reserve.

5.8.9 Water Use

Several stakeholders have raised concerns about where water for the operational activities of the BOGP would be taken from and any effects this may have on other water users. MGL has commissioned Kōmanawa to prepare a number of technical studies to determine the level of water use required for the BOGP and the effects the water take may have on other water users. In summary, these reports have determined that there is adequate water available for use from the Bendigo Aquifer (and this is the most suitable water source) which will be stored at the Shepherds Silt Pond and various storage tanks across the Project Site. As noted in Section 3.16 of this report, the BOGP will also utilise recycled water as it becomes available from the processing plant and mining operations, with the collection and reuse of mine-impacted water eventually resulting in borefield make-up water requirements being substantially reduced.

To protect surface and groundwater quality, diversion drains will be constructed around the site to ensure clean water remains separated from mine-impacted water.



All mine-impacted water will remain within a closed water circuit, pumped back to the process plant for reuse. Water from the ELF and TSF will be recirculated to the processing plant. Clean water will only be discharged once confirmed to meet compliance standards. Ongoing compliance monitoring of groundwater will take place and surface water will need to stay within the environmental limits.

5.8.10 Lighting

The effects of artificial lighting on dark sky reserves were raised as a concern by the community. The only dark sky reserve within the Central Otago District covers Naseby, which is located approximately 40 km east of the Project Site and separated by the Dunstan Mountains, Raggedy Range and Rough Ridge Mountains. Regardless, MGL has commissioned a Lighting Report (Cosgroves (2025)) in **Part B** of this application) to assess the potential effects of exterior lighting proposed for the BOGP. Overall, the proposed lighting layouts will comply with the light spill limits set out in the District Plan and a range of methods will be utilised to reduce light spill while also providing a safely lit work area.

5.8.11 Servicing

During consultation questions were raised by stakeholder about the impact of the BOGP on power supply within the area due to the additional power requirements anticipated for a mining project of this scale.

Aurora Energy is responsible for delivering power to the BOGP and have confirmed the power demands associated with the BOGP will not cause any issues related to reliability or performance of the electricity system. This is partly because the BOGP will be fed from its own substation at the Ardgour Terrace Site directly connected to Aurora Energy's 66kV transmission network.

In addition, the supply of power to the Project Site will bring forward a major infrastructure upgrade by Aurora Energy that will increase power supply and reliability to Central Otago.

5.8.12 Noise and Vibration

Residents on the access roads and nearby Bendigo Loop Road have expressed concern over the potential noise and vibration effects from the BOGP. MGL has commissioned a Noise and Vibration Assessment (provided by Marshall Day (2025) in **Part B** of this application) and an associated Noise and Vibration Management Plan (provided in **Part G**) which details the proposed measures to mitigate noise and vibration effects. This includes through the design and location of infrastructure, including the siting of the processing plant and associated infrastructure within the Shepherds Valley to provide natural noise mitigations (as well as being visually screened by natural topography).



In addition, noise monitoring has been undertaken which determines the noise levels at the nearest sensitive receivers will comply with the relevant District Plan standards. While one property on Thomson Gorge Road will experience an increase in noise levels associated with construction phase truck movements for 2-3 months, noise from truck movements on roads are not controlled by the District Plan. Any potential vibration effects will be managed through the limits set out in the proposed conditions.

5.8.13 Visual and Landscape

Stakeholder feedback has highlighted concerns regarding the potential visibility of the proposed mine and associated infrastructure from a range of public and recreational viewpoints. These included local roads, as well as recreational trails, elevated lookouts, and aerial perspectives from tourism operators. The potential for visual impacts on visitor experiences and local amenity was a common theme, particularly in the context of Central Otago's open and expansive landscape, which is highly valued by residents and tourists alike.

In response to these concerns, MGL has commissioned a Landscape, Natural Character and Visual Amenity Effects Assessment prepared by Boffa Miskell (2025) and the LERMP to guide the rehabilitation of the landscape following mine closure. As a result of these assessments MGL has undertaken a range of measures to minimise impacts. This includes minimising the BOGP footprint, redesigning the RAS Open Pit to reduce the visibility of the pit highwall from public viewpoints, designing ELF's to reflect the natural contours of the surrounding landscape and ensuring building designs comply with the colour standards in the District Plan.

5.8.14 Property Values

Some concerns have been raised about the effect of the BOGP on property values. These concerns typically related to a possible reduction in property values, particularly for those properties in relatively close proximity to the Project Site.

Case law relating to the assessment of environmental effects has made it clear that effects on property values (positive or negative) are not relevant 'effects' for the purposes of assessing and determining a resource consent application. That said, MGL recognises that a reduction in values will likely be of concern to the affected landowner. As noted throughout this section (and in more detail in Section 6 of this report), all of the off-site amenity effects on surrounding neighbours will be within widely accepted limits. On that basis, it is difficult to conclude that there will be any adverse effects arising from the BOGP on those properties.

Conversely, the additional demand for properties as a result of the influx of people working at the BOGP and related businesses and community facilities could result in upward pressure on property values due to scarcity of supply. This could likely be the case for properties that are close to the Project Site, whereby workers at BOGP are able to live in relatively close proximity to their place of employment.

5.8.15 Heritage

As the site has historically been used for gold mining, some members of the local community expressed concerns about the loss of archaeological features and heritage values. In response to this, MGL is seeking an Archaeological Authority from HNZPT and will undertake works in accordance with an Archaeological and Heritage Management Plan. This plan outlines protocols to ensure that:

- > All archaeological features within the project area are documented to recognised best practice standards prior to any disturbance or removal;
- > Identified heritage features that are to be retained and protected will be clearly marked in the field, and buffers will be established to avoid unintentional disturbance; and
- > Site works will be conducted in accordance with relevant statutory requirements, including any authority processes under the HNZPT Act.

5.8.16 Ecology

Throughout the community engagement process, a number of stakeholders raised concerns regarding the potential ecological impacts of the Project. The primary issues expressed related to the potential disturbance of native flora and fauna within the project footprint, the risk of downstream effects on freshwater habitats and aquatic species, and the ability of rehabilitation and closure plans to restore biodiversity values following mining.

MGL commissioned an extensive suite of ecological and environmental investigations covering terrestrial, avian, herpetofauna, and freshwater ecosystems. These studies established a detailed baseline understanding of existing ecological values, identified the likely impact pathways, and informed the development of specific measures to avoid, remedy, mitigate, or compensate for potential effects. The results of these studies directly influenced the design and planning of the project.

MGL has also committed to progressive rehabilitation throughout the life of the project to minimise the extent of disturbed land at any one time. As part of the overall mitigation and enhancement strategy, two predator- and pest-exclusion ecological areas will be established, together covering approximately 66 hectares.



These fenced areas will protect remnant native vegetation and provide secure habitat for indigenous species, resulting in a measurable uplift in local biodiversity and ecological resilience.

At closure, significant portions of the site will be rehabilitated into a mosaic of wetlands, drylands, and engineered rock stacks designed to replicate natural landforms and provide diverse ecological habitats. The closure and restoration strategy has been developed in consultation with ecological experts.

As part of the residual effects management package for the establishment and operation of the BOGP, ecological restoration will be undertaken across parts of Ardgour Station, called the Ardgour Restoration Area. The Ardgour Restoration Area is made up on approximately 1,263 ha and lies northeast of the mine footprint. The objective of this area is to enhance both woody ecosystems and sustain indigenous dominated herbfield (cusionfield) ecosystems.

5.8.17 Remediation and Closure

The importance of rehabilitation and closure planning was a common theme raised by stakeholders throughout the consultation undertaken to date. This includes not only what the Project Site will look like after the mining operations associated with the BOGP are complete, but also how this will be managed financially. As set out in Section 3.21 of this report, MGL has prepared a Mine Closure Plan and the LERMP which provides a comprehensive framework for rehabilitation and closure activities to ensure the post-mining land use is predominantly ecological conservation.

MGL has also committed to a financial bond as part of the consent conditions which will ensure that the rehabilitation objectives are achieved. Further details are provided in Lane Associates (2025) provided in **Part B** of this application.

