Attachment A: Te Nehenehenui Comments on Ōparure Quarry South-Western Pit FTAA-2606-1251

1. Refinement of the Proposal

Proposal	TNN Comment	Suggested way forward
The applicant proposes to reduce the original 88 ha footprint to 59.6 ha, principally to avoid the northern catchment which drains into the upper Mangawhitikau cave and stream system. The revised proposal confines the pit to the southern catchment, which drains through the subterranean Camelot Stream system and discharges via Pōtea and Pumphouse Springs into the lower Mangawhitikau Stream.	In our submissions to WRC and WDC in May 2025, TNN specifically sought clarification of: • When the Mangawhitikau catchment would be delineated and the Camelot Cave buffer zone established, particularly whether this would occur before works commenced. • How adverse effects on the Mangawhitikau catchment and Camelot Cave system would be avoided, remedied or mitigated. • What monitoring thresholds would prevent quarrying from commencing in areas where adverse effects had been identified.	Te Nehenehenui (TNN) supports the reduction in the proposed quarry footprint, which reduces the potential for adverse effects on the ecologically sensitive upper Mangawhitikau cave and stream system.

2. Proposed Ecological Betterment

Proposal	TNN Comment	Suggested way forward
The applicant proposes that at least 21 cave entrances will be protected from stock and enhanced by planting and pest control. The combined floor area of the caves selected for protection will be at least 224 m^2 and the cave entrances to be protected must be within 10 km of the site. • The applicant proposes 6.7 hectares of planting between and around existing SNAs. This comprises approximately 2.5 ha of planting to connect existing native vegetation remnants and improve habitat connectivity and 4.5 ha of additional adjoining pasture to be fenced and planted (totalling 7 ha). A 0.5 ha lizard release area will be established within the 2.5 ha connecting corridor.	We note that preventing sediment from entering the karst system is generally more effective than trying to manage its effects after it enters the underground stream network. • WDC draft condition 24(b) says not less than 6.7 hectares of planting between and around SNAs. It is our preference that these areas are fenced (as indicated by the applicant) and this is stated in the condition. • Appendix U7 states that the total area proposed to be fenced is 10.4 ha, and within this, 9.4 ha will be planted (excluding existing areas of bush/vegetation). WDC draft condition 24(c) requires sediment control improvements over at least 9.4 ha of pastoral	Subject to addressing our comments on specific conditions in the adjacent column, TNN is supportive of the proposed ecological betterment measures intended to reduce sediment entering the wider catchment. In a karst environment we also support any measures aimed at reducing sediment at source. We request that the Panel consider whether minimum planting survival rates/standards are appropriate as part of the condition set. We suggest that consent conditions require the applicant to invite Ōparure Marae and TNN to participate in the five-year review of the Plant and Animal Pest Management Plan. The review should consider monitoring results, the effectiveness of pest control measures and whether ongoing management is

• The applicant proposes to improve sediment control by planting 9.4 ha of steeper pastoral land within the Mangawhitikau Stream catchment. • The applicant proposes not less than 11.8 hectares of riparian planting or enhancement of existing native vegetation in the Camelot Cave Stream catchment. • Pōtea Spring is where the subterranean Camelot Stream resurfaces after travelling beneath the proposed quarry. The applicant proposes planting within an indicative 20 m buffer around the springhead, replacing exotic vegetation with native species over a five-year period. This location is already excluded from stock access.	land but does not require the 9.4 ha to be planted or require the 10.4 hectares to be fenced. Our preference is that this requirement is included in the consent conditions. • WRC draft condition 36(b) requires the Ecological Betterment Plan to address native planting and maintenance around Gate (Pōtea) Spring. Appendix U7 proposes native planting within an indicative 20 m buffer around the springhead and the progressive removal of exotic vegetation over five years. It is our preference that these specific commitments are included in the consent conditions. In our submissions to WRC and WDC in May 2025, TNN supported the recommendations of ecologist Gerry Kessels that a 25 m radius of planting around each cave entrance was preferable to the 10 m radius proposed by Graymont. Appendix U7 proposes a 10 m planting radius around each of the 21 cave entrances selected for protection and enhancement with extension of planting to a 25 m radius where there is no surrounding native vegetation. WDC draft condition 24(a) requires the protection and enhancement of at least 21 cave entrances but does not specify either a 10 m or 25 m planting radius. • It remains our preference that the protected and managed area around each of the 21 cave entrances extends to at least 25 m, whether that area comprises existing indigenous vegetation or new planting, and that this is specified in a condition. • The applicant proposes that at least 21 cave entrances will be protected from stock by fencing. It is our preference that this is included in a condition.	required to maintain the ecological betterment outcomes.

	• If possible, we would prefer a site-by-site schedule showing the mapped protection area for each cave entrance. TNN specifically requested pest control for the operational life of the quarry in its May 2025 submissions, adopting the recommendation of ecologist Gerry Kessels. The applicant proposes a five-year pest animal and weed management programme, with review to determine whether further management is required. Given the potential for reinvasion and the need to consider adaptive management methods as environmental conditions change over time, we suggest a way forward in the adjacent column.	

3. Camelot Cave System

Proposal	TNN Comment	Suggested way forward
WRC draft condition 14 requires the Camelot Cave Buffer Zone (CCBZ) to extend 100 metres either side of the estimated centreline of Camelot Cave. The buffer zone must be surveyed and marked on site before quarrying commences. Condition 15 establishes a 25 m no-blast zone and restrictions on blasting within 25–100 m of the cave.	In 2025 we sought assurance that the 23 m vertical separation between pit floor and cave roof would be maintained. • We note that the WRC draft conditions 14–18 are more detailed, but we are still not sure whether the vertical separation needs to be specified in a condition. • TNN supports the proposed restrictions on blasting in proximity to the Camelot Cave system. However, condition 15 does not specify whether the 25 m and 100 m distances are measured from the independently confirmed cave geometry. • The blast management plan conditions 18(e) and (f) could be strengthened to require the procedures to include a timeframe for notifying WRC of an exceedance and the protocols for corrective actions.	Noting our comments in the adjacent column, TNN is generally cautious about relying on management plans to establish substantive environmental safeguards. We request confirmation that the proposed minimum vertical separation of 23 m between the Camelot Cave roof and the quarry floor is sufficient to protect the cave system, along with clarification of how this separation will be established and maintained through consent conditions. TNN supports the proposed restrictions on blasting in proximity to the Camelot Cave system. However, we request clarification that the 25 m No Blast Zone and 100 m Blast Vibration Restriction Zone will be measured from the independently confirmed cave geometry, rather than the estimated cave centreline.

4. Water Quality

Proposal	TNN Comment	Suggested way forward
WRC draft conditions 19–21 establish continuous upstream and downstream turbidity monitoring once physical works commence within the Camelot Cave Buffer Zone or Blast Vibration Restriction Zone. The conditions prescribe an initial trigger of 2,000 NTU, with further investigation and response requirements where downstream turbidity remains more than 20% above upstream levels for periods exceeding 48 or 72 hours. These include suspension of works within the relevant protection zones where turbidity is not reducing, together with further ecological assessment and remedial measures where specified thresholds continue to be exceeded.	As noted above, in our submissions in May 2025, TNN specifically sought clarification of what monitoring thresholds would prevent quarrying from commencing (or continuing) in areas where adverse effects had been identified. • In the absence of specialist hydrological advice, TNN is unable to determine whether the proposed 2,000 NTU threshold and associated response periods are sufficiently precautionary to protect the receiving environment. • Appendix U6 and draft condition 20(a)(i) refer to the delay between sediment entering the system and a water quality change being recorded downstream.	We request clarification of the 2,000 NTU trigger and how the delay periods will be managed.

5. Indigenous Fauna

Proposal	TNN Comment	Suggested way forward
The application identifies potential direct and indirect effects on indigenous fauna, including bats, birds and lizards, arising from vegetation clearance, habitat loss and quarry operations. Species-specific management plans have been prepared to avoid or minimise these effects. The proposed quarrying activities will involve regular drilling and blasting, with associated noise and vibration effects.	TNN's submission to WDC in May 2025 queried the effects of noise and vibration on native fauna. As far as we can see, the draft consent conditions do not identify these three plans or require their implementation through specific conditions.	TNN observes the importance of avoiding adverse effects on indigenous fauna. It is our view that the key safeguards contained in the management plans should be secured through consent conditions.

6. Archaeology, Accidental Discovery Protocols and Annual Hui

Proposal	TNN Comment	Suggested way forward
The applicant's archaeological assessment reports no identified archaeological material. In June 2025, the applicant advised TNN that seven caves were inspected by trained cavers under archaeological direction.	WDC conditions 40–42 provide for mana whenua monitoring during topsoil disturbance, accidental discovery and annual hui.	TNN is supportive of WDC conditions 40–42, although we note that no monitoring of the disturbance of subsurface substrates (including the quarrying of the limestone in the pit) is proposed. Should the Panel propose any substantive amendment to cultural monitoring and discovery conditions, we request engagement with both Ōparure Marae and ourselves.

7. Cultural Monitoring Plan

Proposal	TNN Comment	Suggested way forward
WRC and WDC draft conditions 8–13 propose a Cultural Monitoring Plan (CMP).	We observe that timing and resourcing are always an issue for mana whenua. For clarity we suggest: • Amending WRC condition 8 so that WRC are notified when the invitation to Ōparure Marae is extended. • Amending WRC condition 13 as it states that the consent holder shall implement the certified version of the CMP. However, condition 9 only requires the CMP to be submitted to WRC, not certified.	Please see our comments on specific conditions in the adjacent column. TNN defers to Ōparure Marae as kaitiaki and supports the proposed CMP's recognition of mana whenua as kaitiaki, including opportunities for cultural monitoring of the Camelot Karst System and ecological betterment initiatives and the application of appropriate tikanga during monitoring.

8. Progressive Rehabilitation and Pit Closure

Proposal	TNN Comment	Suggested way forward
Both these matters were raised in our submissions in May 2025. The application proposes progressive rehabilitation. During the first 13 years, overburden from the South-Western Pit will be used to rehabilitate the existing Ōparure Pit. WRC draft conditions 86–90 require a Pit Rehabilitation Plan (PRP) which must be submitted to WRC for certification before quarry expansion activities commence. TNN and Ōparure Marae must have an	• We note some cross-referencing errors in the draft conditions. • We support the imposition of a rehabilitation bond. • The WDC draft conditions do not refer to the PRP and the WRC draft conditions do not refer to the PCP. We request that the conditions provide for coordination between WRC and WDC when these plans are prepared, certified	We support the conditions which enable TNN and Ōparure Marae to review and comment on the PRP and the Pit Closure Plan before they are submitted for certification. TNN requests that both ourselves and Ōparure Marae are provided with an opportunity to review and comment on the PRP as part of its three-yearly review process, including where no amendments are proposed.

opportunity to review and comment on the PRP before certification. WDC draft conditions 45–48 establish similar requirements for a Pit Closure Plan (PCP) and enable TNN and Ōparure Marae to review and comment on the plan before it is submitted for certification.	or amended to ensure that their requirements remain consistent.	