



BENDIGO-OPHIR GOLD PROJECT

To: Bendigo-Ophir Gold Project Panel

Via: Environmental Protection Authority: bendigoftaa@fasttrack.govt.nz

Statement of Suze Keith on behalf of Sustainable Tarras Incorporated

Date: 7 September 2026

Introduction

We have reviewed the following three documents supplied by Santana Minerals in response to RFI 11:

- GHD Bendigo Ophir Gold Project Social Impact Assessment, 17 October 2025
- Just Add Lime Bendigo Ophir Gold Project Social Impact Assessment Addendum, July 2026
- MGL Bendigo Ophir Gold Project Community & Stakeholder Engagement Update Report, October 2025 – July 2026

Below we review the methodology and conclusions in the three documents. Our review is underpinned by our original comments (April 2026), the current material before the Panel, including the expert effects assessments and personal statements from affected residents, and our insights into the real-life experience on the ground in Bendigo-Tarras over the past three years.

GHD, Bendigo Ophir Gold Project Social Impact Assessment (SIA), 17 October 2025

Summary

1. The SIA assesses the project's social impacts as overall low-negative during mining (assuming mitigation is implemented successfully). Of its principal social-impact categories, livelihood is the only one assessed as producing a net benefit. Post-closure, effects are assessed as moderate positive (assuming rehabilitation and benefits from a new access road and improved recreation facilities). Effects are not evenly distributed across the communities of the district.
2. Sustainable Tarras (ST) highlights the SIA's finding of overall low-negative during mining, but also notes that it has several shortcomings, relating to the level of Project understanding by those interviewed, the author's assumptions of mitigation/rehabilitation success and on mitigations not proposed by MGL, and the level of generality at which impacts are assessed. We consider that impacts would likely be assessed as moderate to high negative (and for some impacts, extreme negative), if based on current assessments (taking into

account updated and new information available to the Panel) and with a more granular assessment.

3. ST notes that because the SIA was not submitted by MGL until very recently, it has not informed the work of the planners in developing conditions. Consequently there has been no evolution of understanding the social impacts through the development of the BOGP to inform its design.

Level of Project understanding of those interviewed for the SIA

4. When the SIA was produced in October 2025, little was known about the BOGP within the Tarras-Bendigo community nor further afield. The substantive application had yet to be submitted, and the information shared at MGL's drop-in sessions was very high level. MGL was unwilling to share the reports they had completed at the time (according to announcements to the Australian Stock Exchange) when requested.
5. ST wrote to MGL's chief executive in June 2025, where we asked a range of questions which the Tarras-Bendigo community wanted answers to. The questions referenced international mining standards, best practice approaches, research and data. MGL didn't answer the questions. ST then made a series of Official Information Act and Local Government Official Information & Meetings Act requests to the Department of Conservation, Central Otago District Council and Otago Regional Council. Some of these requests were responded to, so the ST members who were interviewed for the SIA did have a significantly higher level of understanding of what the mine entailed than they would have otherwise had, and certainly higher than many other members of our community.

Assumptions of mitigation success means social impacts are underestimated

6. Across all the sub-categories, 26 rated a negative impact, 9 positive, 6 neutral, and 2 were not assessed. However, those ratings reflect the information that the author had at the time:
 - a. In rating the impact of the mine post-mitigation, the author has assumed that all mitigations proposed by MGL are implemented and are successful during construction, operation and closure. However many of the mitigation methods are now accepted by all experts as having an uncertain outcome, and the effectiveness of other mitigations is disputed by experts. As a result, the SIA is over-reliant on early and untested information to reach the conclusions it has. Ongoing iterations of the SIA through the evolution of the BOGP would have been preferable to fully understand the social impacts and the community's knowledge of what it entails matured.
 - b. In other places, mitigation is relied on that is not supported by experts as mitigating an impact. For example, in Section 8.2.6 Overview of impacts to amenity and character, a neutral rating is given to construction impacts on mining artefacts and on the dark skies of Tarras-Bendigo. The SIA author assumes that interpretive signage highlighting where heritage features used to be results in a neutral outcome, when that finding is not supported by archaeological evidence. Similarly the mitigations to address dark sky values also achieve a neutral rating, when those impacts remain in dispute between the experts.

- c. There has been no update of the SIA taking into account current expert assessments of physical impacts (we address the Addendum below - it is not an update of the SIA). We consider that the author had minimal insight into the effects of the project and the likely success or otherwise of the mitigations at the time of undertaking the assessment. If the various components had been able to be better understood (including through discussions with the directly affected community), the author would have had to recognise the varying levels of confidence in management responses and we expect the follow-on assessment of adverse social impacts would have arrived at a more negative outcome.
- d. As the deliberations have continued and the challenging nature and high uncertainty of numerous mitigations has become clear through the Panel's process, the effects during construction, operation and closure could be seen to be closer to moderate negative or high negative. Some residual effects could rate extreme negative if it is found that elements of the proposal are too difficult or expensive to mitigate¹ applying the SIA scoring criteria.
- e. One of the areas that received a 'high positive' rating related to opportunities for MGL to invest in social infrastructure via a Social Investment Strategy. This has not been done, nor has it been proposed in the draft consent conditions to date.

Social impacts are assessed at a high level of generality

- 7. A comment on this assessment, which also carries over into the Just Add Lime Addendum, is that while there is minimal reference to people living close to the mine site, there is also little analysis of the specific impacts on these people, as compared to the generalised district-level impacts. There are no recommendations or mitigations made to address the highly adverse impacts local people will experience if the proposal is to go ahead. We do not understand this to be best SIA practice.

Tarras Community Plan is undervalued as a statement of community aspirations

- 8. The SIA references the Tarras Community Plan once², highlighting that local residents want to have a say in the future of Tarras. We consider that the Community Plan should have been used as a lens for understanding what the community aspires to in terms of environmental, social and economic outcomes and forms of development.

Just Add Lime, Bendigo Ophir Gold Project Social Impact Assessment Addendum (the Addendum), July 2026

Summary

- 9. Although this is presented as an "Addendum" to the SIA, it appears to be more in the nature of an advocacy document which omits significance methodology and provides unverified claims. It does not update the original SIA assessment based on more recent information. We note that it was completed in 3 weeks with only one interview and was prepared under a tight scope which excluded the assessment of impacts at an individual, household, or property-specific level.

¹ P.21 BOGP Social Impact Assessment, October 2025 for scoring criteria and definition, p.21

² https://www.fasttrack.govt.nz/_data/assets/pdf_file/0008/33020/654d3ff2531af18729fbe68da9837078d256c265.pdf p.28

Significant flaws in methodology and “effects assessment”

10. ST questions the methodology used for the Addendum (Section 1.2, p.1) and, as a result, its assessment of social impacts (in as much as there is such an assessment in this document). Issues include:

- a. There is no significance methodology in the Addendum and no effects assessment. Section 3 is headed “Update to potential Social Impacts”, but the author expressly states: “it does not assess individual impacts” and says that it does not replace any part of the original SIA. That is borne out by the document. There is virtually no assessment of impact significance even at a general level. Rather the Addendum substitutes management measures for an effects assessment. For example, workforce travel and behaviour “may affect safety, rural amenity, trust, and social cohesion”, particularly for nearby landowners and occupiers. But the report then says MGL’s management measures provide an “appropriate basis for managing these impacts” (p.12), relying on policies, speed restrictions, managed accommodation, buses, complaints procedures and the Community Liaison Group. What is the level of unmitigated social effect? How effective is each proposed measure likely to be? What residual effect remains? These matters are not assessed.
- b. The author comments that there was a review of the SIA, new information and a targeted review of social impact areas. Under the limitations in section 1.3 (p.2), the author notes that no new engagement was undertaken except for one interview. It also appears that reviewed material was limited to that provided by MGL, except for unidentified ‘publicly available data’ (p.2). There are sections which combine the feedback from the Community Liaison Group (CLG), Local business and stakeholder engagement and Landowner and occupier engagement, but no section specifically summarising information that has been provided in comments from invited Section 53 parties. It would have been helpful to consider the views of those closest to the Project, now that such information has been made available, with those most engaged in the Fast Track process and therefore likely most affected.
- c. The review of engagement undertaken since the SIA and incorporated in the Addendum appears to rely on MGL’s own reporting of its engagement sessions and CLG meeting notes prepared by MGL.
- d. ST declined to join the CLG because the group charter offered was unacceptable and we provided reasons in writing to MGL which was shared in our community comments³. While MGL states that the invitation remains open and the Addendum also notes this, the author makes no statement as to why the invitation was declined despite our comments being publicly available. There has been no willingness on MGL’s part to adapt the group charter to provide a more equitable engagement structure. As it currently stands, the CLG falls short of good practice in relation to the local community. For example:
 - The first MGL-selected Tarras community member on the CLG resigned in March 2026 after 3 meetings, publicly describing it as “just window

³ https://www.fasttrack.govt.nz/_data/assets/pdf_file/0013/23512/c6f447f5340d4c002aae551479aee9bdc4c504.pdf

dressing” and “a box ticking exercise by MGL so it can claim it has done community consultation.” The Addendum omits this resignation and its stated reason entirely, while still citing the CLG as evidence of functioning Tarras representation.

- A second MGL-selected Tarras representative has been listed as an apology in four of the Santana published minutes for the five meetings held, and is not in attendance at the fifth.
- According to the minutes of the CLG⁴, current membership is weighted towards individuals who are also members of the Otago Goldfield Heritage Trust⁵ who are organising the World Gold Panning Championships⁶, which has received \$60,000 in sponsorship⁷ from MGL. There is no reference to this conflict of interest in the meeting minutes.

11. Despite the Addendum being prepared in July 2026, it does not:

- a. Reflect MGL’s updated assessments of long-term environmental effects or other parties’ assessments of those matters.
- b. Assess the social effects on those people most directly affected by BOGP, as identified throughout this process, for example the Kearsleys, Mr and Mrs Calder and Mr Reinecke. They have advised the Panel that they have still have had no engagement with MGL. The Addendum does not specifically consider effects on them, or ways to mitigate those effects. For example, Mr Reinecke gave specific evidence about a drop in his property value. The Addendum refers to “perceived impacts” including “concerns regarding reduced property values”, but recommended mitigations do not address that social impact at all. It is the same for the effects identified by the Kearsleys – no assessment and no mitigation. This appears to be due to the limitations of the Addendum, which note that it does not assess impacts at an individual, household or property-specific level. Comments from Panel members at the Cromwell hearing regarding the local neighbours being collateral damage seem accurate here.

12. Under 3.2 Community wellbeing, social cohesion, local identity (p.11) the author notes that people express “concerns” about safety and environmental risk, which is deemed ‘largely perceptual’. This not only diminishes the concerns expressed, but also fails to take account of the expert evidence now available to the Panel which describes risks that experts are struggling to fully assess due to a lack of data and/or possible mitigations, and impacts that will remain significant even if mitigated to the extent possible.

13. The author of the Addendum perpetuates the assumption made by the author of the original SIA, which is that the mitigations are not only implemented, but are done effectively and successfully. Again the new information and evidence presented over the last 5 months has indicated otherwise.

⁴ <https://www.santanaminerals.com/community-1>

⁵ <https://register.charities.govt.nz/Charity/CC24302>

⁶ <https://www.goldfieldstrust.org.nz/worldgoldpanningchampionship>

⁷ https://www.fasttrack.govt.nz/_data/assets/pdf_file/0020/15563/A.08-Section-1-Introduction.pdf

14. An example here are the proposed emergency preparedness plans. The nature of the risks to human health are not described, however the author describes the approach to the plan development and says “engagement is being used to update and strengthen” the plans (p.12). The Cromwell hearings heard from Jonny Trevathan, whose property is downstream from the mine site. He and his father learned that their land was exposed under a series of emergency scenarios, such as tailings dam failure, only by reading MGL’s Fast Track application. There was no direct engagement with the Trevathans that would enable them to understand what the risk means to them and their farming operations, nor what measures might be effective for ensuring that harm is minimised in the case of an event. MGL contacted the Trevathans 2-weeks prior to writing this RFI response, offering a technical expert to meet with them.
15. Vulnerable groups are identified, and the importance of assessing effects on people in these groups is acknowledged, but effects on them are not actually identified, assessed or quantified. For example “Landowners and occupiers near the site may be particularly affected. Management measures proposed by MGL provide an appropriate basis for managing these impacts” (p.12).
16. Under 3.9 Vulnerable and sensitive populations (p.15-16) the author provides a more detailed list of who might fit within this categorisation. There is no deeper investigation into the scale of their vulnerabilities, nor the extent of these impacts on them. The only management measures proposed are social investment and closure planning. As mentioned above, there is no Social Investment Plan. Closure planning does not mitigate the social impacts of 14 years of construction and operation on these people and groups. The only social impact-related conditions proposed in Condition C137 (Mine Closure Plan requirements) is that “a strategy has been implemented that manages impacts of mine closure on the workforce”, which is much narrower than the recommendations in both the original SIA and the Addendum. The SIA and Addendum also refer to closure impacts on local businesses and the community and measures to mitigate this. The Addendum specifically refers to the need to consider vulnerable groups in closure planning (not just MGL’s workforce).
17. The scale used for economic benefits is inconsistent with the scale at which adverse social effects occur. The report emphasises that direct mine employment is only 0.7% of existing Inland Otago employment, which makes adverse service and workforce effects appear small. At the same time, it emphasises \$360 million annual GDP, 351 direct jobs and wages 104% above the Inland Otago average when describing benefits.

Addendum is a non-independent advocacy statement

18. Illustrations of the non-independent “advocacy” nature of the Addendum are:

- a. The statement that: “Where opposition exists, local feedback points to people and organisations outside the district as the main source, but this has not been validated.”⁸ This statement appears intended to discredit opposition as coming from non-locals. It is clearly a controversial statement. A professional assessment would not include this type of material without verifying it. Verification would have been straightforward, based on material already before the Panel, such as comments and hearing presentations from ST and affected landowners and water

⁸ Addendum, 2.4 (“engagement feedback”) p.8.

users, or by directly contacting opposition groups to ask about their members' connections to the district. At no time has ST been contacted by the Addendum author to verify this statement. ST rejects this statement as incorrect.

- b. The contrast between the approach to opposition groups and the assessment of “community support”, for which the cited evidence is that “the Santana Mine Supporters Facebook page has approximately 14,000 members, of which 13,000 are reported to be **New Zealand based (not verified)**. This shows support among local communities and businesses” (our emphasis). A professional assessment would not treat a non-verified assessment of “New Zealand based” Facebook group members as evidence of community support while at the same time discounting opposition on the basis it comes from “people and organisations outside the district”.
- c. When referring to the CLG (which is given significant weight in the Addendum’s description of feedback themes), the Addendum states that “Sustainable Tarras has an open invitation to join but has not taken this up.” There is no context for that statement, despite ST having explained in its comments why the CLG does not provide a true community voice, and why it is currently not part of the Group (as explained again above).

Tarras Community Plan analysis is woeful

- 19. Section 4 of the Addendum addresses RFI 11 Question 22 regarding alignment with the Tarras Community Plan (the Community Plan). There was no reference to the Plan in MGL’s substantive application despite this being a clear and published statement of what the local residents value. ST’s comments included analysis of the Community Plan, including in Mrs Batchelar’s statement⁹ and Ms Allan’s Planning statement¹⁰.
- 20. Mrs Batchelar was heavily involved in the development of the Community Plan as a representative of the Tarras Chapter of Rural Women. Mrs Batchelar describes an evolving community with a growing diversity of residents who want to have a say in the future of their home. She sets out the Community Plan’s Vision for Tarras:

“Tarras is a strong, thriving community that is a great place to live, work and visit, set in an outstanding environment”

- 21. She explains that the Community Plan “indicates the Community’s desire for development in a strategic and planned way. To enhance the Outstanding Natural Landscape and continue to offer the benefits of the rural environment to provide for residents and visitors alike a place to relax and unwind which is beneficial for their physical and mental health” (paragraph 14). She says that the Project “does not align with the values and aspirations of Tarras which has a consensus on valuing the Outstanding Natural Landscape, rural character, lifestyle, visual amenity and a tight-knit community feel.”
- 22. Table 4 (p.17) of the Addendum assesses that the proposed mine has moderate alignment with the Community Plan overall. We note that there is no description of what the score categories mean.

⁹ https://www.fasttrack.govt.nz/_data/assets/pdf_file/0021/23538/Sustainable-Tarras-18-Bev-Batchelar.pdf p. 5

¹⁰ https://www.fasttrack.govt.nz/_data/assets/pdf_file/0020/23537/af4a429fd66bac4321b47898e74e545e4b08bc06.pdf

23. ST suggests that the Panel should look at the Community Plan itself and not rely on how it is summarised in the Addendum. The Addendum inaccurately takes a value such as “Economic Vitality” and assesses alignment as “strong”, but without analysing what the Community Plan actually says about economic development. The Community Plan includes a key value statement/objective for Economic Vitality (The economic vitality of Tarras is strong, built on great farming, quality produce and products, with a vibrant country village) and specific Actions. The BOGP does not align at all with that value statement or the Actions, and actively undermines other stated values relating to the natural environment and community.
24. The Community Plan includes a request for discussions to be held with the community (by anyone involved in changes in the area) to ensure there are opportunities identified for local people and businesses to be involved in developments. The Addendum’s author notes that “Alignment [with Economic vitality] is stronger if benefits flow to Tarras businesses, growers, tourism operators and residents rather than mainly to Cromwell, Queenstown, Wānaka and wider Otago.” However, there is no condition which requires MGL to direct investment toward Tarras-Bendigo businesses, nor does MGL’s record of interested businesses include their location (p.10). Had the author looked into the recorded notes from the Community Plan workshops in the Community Plan, she would have seen that the most highly rated comment was “Remove uncertainty regarding potential airport and mining development - don’t want an industrial zone as the gateway to Central Otago; divisive to community; don’t want local vibrant community destroyed”¹¹. This is the most direct, specific part of the Plan relating to a potential mining proposal, and it is not quoted or addressed anywhere in the alignment assessment. The Addendum’s author neglects to consider the importance of a healthy natural environment for the area’s existing economic components of farming, viticulture, horticulture and tourism. Reputational impacts, direct impacts to water quality and allocation, risks associated with the dispersal of mine-generated dust are not considered, despite evidence being available to inform an assessment. The Panel has evidence about the incomes of communities near to mines in New Zealand which shows that Cromwell is markedly more prosperous than mining support towns of Waihi and Palmerston¹² which does not inform the Addendum. Given the focus of this assessment is the economic vitality of Tarras, we do not accept the Addendum’s author’s assessment of strong alignment with the Community Plan.
25. The natural environment - “the stunning Tarras environment is maintained and enhanced for future generations” - achieves a low-moderate alignment rating. The Community Plan reports on strongly-held values such as uninterrupted vistas, dark skies, peace, quiet, rivers, wildlife and natural landscapes. The Addendum’s author relies entirely on the success of the proposed mitigations to address these impacts, many of which are in question. There is no mention of the unmitigable impacts, such as the permanently modified footprint of the mine, including the reduced conservation covenant, the two open pits and the tailings dam. ST disagrees that there is low to moderate alignment with this community value.
26. For the connected community value, the Addendum’s author rates this as low-moderate. The author makes little mention of the tension the mine has brought to the community,

¹¹

<https://www.codc.govt.nz/repository/libraries/id:2apsqkk8g1cxbyoqohn0/hierarchy/Services/Community%20Development/Community%20Plans/Tarras%20Community%20Plan.pdf> p.32

¹²https://www.fasttrack.govt.nz/data/assets/pdf_file/0015/23523/40e7fa556461ecf52c5b606eb905cd03b7d044c7.pdf

which is felt daily by the adjacent residents and has done for years now. Earlier in the assessment the author says “With the varying perspectives on the BOGP in the Tarras community, there is a risk that differences could be exploited resulting in a greater split of the community, impacting social cohesion.” (p.17). This downplays the BOGP’s impacts by attributing social cohesion effects to people responding to the proposal, rather than to the proposal itself.

27. Alignment with the Tarras voice is rated as moderate. The Addendum’s author regularly mentions ongoing and responsive engagement as an important management response throughout the report “to continue to provide Tarras with a voice” (p.17). The Addendum considers there is “moderate” alignment with the Tarras voice, noting some support and some who perceive a lack of alignment. We comment below on the matters that the author relies on for that assessment:

- a. *The CLG*: the reasons why the CLG does not represent the Tarras-Bendigo community voice are set out earlier.
- b. *Ongoing engagement*: There has been no engagement for it to be “ongoing”, or responsive. We consider that the Tarras voice is absent from MGL’s application and has only been heard through the participation in the fast track process that the Panel has made available.
- c. *MGL’s sponsorship programme and community support activities*: Of the 46 activities which are listed as having received sponsorship from MGL, four are based in Tarras (Tarras Golf Club, Tarras School (two donations) and Tarras Volunteer Fire Brigade¹³) and no targeted funds have been promoted. No consent conditions provide for/require social investment despite it being recommended in the SIA. There is a fund aimed at biodiversity and heritage outcomes but nothing aimed at social outcomes.
- d. *A contribution of \$1.25 million per annum to Central Otago District Council (CODC) for community benefit*: This is not a project contribution to the community as is characterised by the Addendum’s author. Rather it is a legal arrangement between CODC and MGL to compensate CODC for access to a public road during operations (essentially a license fee). CODC has announced that it will likely use some of this funding to pay for the development of a Local Bill to set a minimum flow rate for the Manuharekia River, a matter that is well outside the location of the Tarras community¹⁴. The contribution is therefore unrelated to the Tarras community.

28. Further detail on the experience of the Tarras-Bendigo community’s engagement experience is below, in response to the Bendigo Ophir Gold Project Community & Stakeholder Engagement Update Report, October 2025 – July 2026. It describes the significant difficulties faced by the local community to have the Tarras voice heard. ST strongly disagrees that there is moderate alignment with this aspect of the Community Plan.

¹³

<https://static1.squarespace.com/static/6643ff2fd1bac338ecafb567/t/6a6bf2c7f799a068faeb8fd/1785459399516/Community+Support+Register.pdf>

¹⁴ <https://www.codc.govt.nz/your-council/news?item=id:2ybk1ea2w17q9s8ou9tg>

29. The community spaces and places values rate alignment with the Community Plan as moderate. Plan responses here note that “The community is mindful that any new development is done ‘sensitively’ to maintain the rural country village feel, and preservation of a traditional New Zealand town”¹⁵. We do not accept that the proposed open cast mine, tailings dam and processing plant are sensitive development. The Addendum’s author continues to assume that the mitigations planned will contribute to Tarras, while overlooking what is valued by the community and will be lost. She refers to specific heritage mitigations while ignoring the heritage loss that will occur. For example she notes that the paths of water races will be ‘sympathetically marked’ while making no assessment of the social impact of the water races being removed as part of the mine project. She does not assess the closure of Thomson Gorge Road as an existing valued recreational route, instead referring to the future establishment of Ardgour Rise.
30. Infrastructure and land use alignment with the Community Plan is rated moderate in the Addendum. The author comments that the project proposes to undertake road upgrades as a basis for this assessment. However, this requirement is due to the additional and significant increase in traffic that the mine will generate. The author notes that accommodation is being organised for workers, including a 48-person camp and caravan park on site to assist with housing pressures. This is not seen as an asset to the community. Rather, it is seen as a potential liability with unwanted social impacts. Had MGL considered the Community Plan, they may have thought to provide an enduring housing legacy by developing permanent workers’ accommodation near to the Tarras Village as suggested in the Community Plan. These mitigations go no way to addressing the infrastructure and land use values expressed in the Community Plan and thus the assessment of alignment with the project is not valid.
31. The Addendum’s author concludes that the “BOGP is forecast to make a substantial and enduring contribution to Central Otago” and that “progress made in developing social and environmental management measures recommended in the 2025 SIA provides a strong basis for managing potential adverse effects and supporting positive outcomes for local communities over the life of the BOGP and beyond.” (p.21). We do not understand how the Addendum’s author reached either of those conclusions. Both the SIA and Addendum demonstrate that little effort has been made to consider the nature and extent of the social impacts specifically on the most affected communities of Tarras-Bendigo. There is high level recognition that these communities will be most adversely affected, such as “health impacts due to the level of stress and sleeplessness” over “uncertainty about the Project’s future” (SIA, p.36) however there are no mechanisms recommended in either document to help address those impacts.

MGL Bendigo Ophir Gold Project Community & Stakeholder Engagement Update Report (Update), October 2025 – July 2026

32. In response to this Update, ST would like to provide the Panel an update on the engagement between MGL and the local residents and ST, including what has happened (or not happened) since the Cromwell hearings.

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<https://www.codc.govt.nz/repository/libraries/id:2apsqk8g1cxbyoqohn0/hierarchy/Services/Community%20Development/Community%20Plans/Tarras%20Community%20Plan.pdf> p.21

33. In general the Update represents a record of activities held, but notably contains no outcomes achieved (for example discussions around and modification of consent conditions, community inputs acted upon which have modified the project etc).
34. The engagement programme is based on the following principles:
- Build long term relationships
 - Provide opportunities for meaningful participation
 - Share information openly and transparently
 - Respond constructively to feedback
 - Adapt engagement approaches as community needs change¹⁶.
35. ST's comments on MGL's application summarise the effort ST went to to engage with MGL¹⁷ and MGL's effort to engage with the Tarras community. Other than the efforts made by ST members to meet with MGL and attend their presentations and drop in sessions, ST has not experienced the five principles outlined above in our efforts to engage with MGL.
36. MGL also describe a listen-respond-improve-report back approach¹⁸. While MGL appeared to have listened in the early days of our engagement, the subsequent three steps of 'respond-improve-report back' were largely absent.
37. The Thomson Gorge residents remain ignored. Despite the discussion at the Cromwell hearing in April around affected neighbours, MGL has not met with these people. In their recent letters to the Panel they express the impact of this and of the mine: "They drive past our gate every day to and from the proposed mine site. They know who we are, where we live, they know how we feel. They know we are directly affected and they choose to ignore us.". They go on to say "Our lives and homes have been thrown into turmoil. On top of that, to have our voice ignored and our safety dismissed in a withheld report is reckless."¹⁹ For these residents the negative social impacts began years ago with the proposal made public and the mining exploration traffic already taking a toll. "On our particular road (Thomson Gorge) Santana's presence and physical works have already had a negative impact and if the mine is consented to proceed it appears we will be in the collateral damage category. On a human and individual level there can be no argument it will have a seriously negative impact on our lives."²⁰
38. We estimate that the chief executive of MGL has driven past the gates of all the Thomson Gorge residents hundreds of times. We know he has been invited to drop in for a beer or cup of tea. This did not occur before the April hearings and has not occurred since. Rather MGL has spent its effort commissioning the Addendum, the scope of which intentionally excluded individual analysis (as did the SIA). We recommend the Panel review Appendices G.1 and G.2 of our comments²¹ which reinforce MGL's framing of these residents and the Tarras community as distant and relatively unaffected.

¹⁶ https://www.fasttrack.govt.nz/_data/assets/pdf_file/0015/33018/RFI-11-Question-21-and-22-Social-Community-and-Stakeholder-Engagement-Update-Report.pdf p.5

¹⁷ https://www.fasttrack.govt.nz/_data/assets/pdf_file/0016/23542/Sustainable-Tarras-Comments.pdf p.17

¹⁸ MGL's Engagement Update Report October 2025 – July 2026, p.5, 2.2 Our Engagement Approach

¹⁹ Simon & Nicola Gibbard, September 2026

²⁰ Bruce & Sandra Calder, September 2026

²¹ [Appendix G – 1. Concerns from Tarras residents at Santana Drop-in 10 Nov 25 \(PDF, 144 KB\)](#); [Appendix G – 2. Santana Minerals letter of response to Tarras residents \(PDF, 122 KB\)](#)

39. The drop-in sessions in the Tarras Community Hall were the only Tarras-specific engagement mechanisms ST experienced that were organised by MGL. Twenty-two sessions have been held in Tarras overall. This number obscures a sharp decline rather than sustained engagement. ST recorded 18 Tarras sessions, most in 2024, tapering to three 60-minute sessions in the last nine months of 2025, before MGL closed off future Tarras engagement via a Facebook post on 6 March 2026 due to low attendance numbers - rather than asking the community what format may be more effective - and meanwhile continuing engagement elsewhere in the district. MGL then resumed Tarras-based drop-in sessions, holding one on 26 July 2026, with 4 people attending. Our view is that these “engagement sessions” are purely a box-ticking exercise.
40. The Update, the SIA and the Addendum place a high emphasis on the CLG, saying it “includes representatives for... Bendigo and Tarras residents” and that “Sustainable Tarras has an open invitation to join but has not taken this up,” without further comment. This statement is technically correct but overlooks the history and is materially inaccurate and misses critical context as described above.
41. In ST’s original community comments, we went to some length to provide MGL with recommendations to help build trust between MGL and our communities²². Unfortunately MGL’s chief planner had not read ST’s comments when questioned at the planning hearing,²³ so its comments have not informed consent conditions. Of the 15 social impact-related recommendations we made, MGL responded to 2 of them²⁴.
- a. The first of these recommendations considered the impact on property values of neighbours to the mine site and proposed compensation similar to Waihi. MGL responded with “Property values not relevant consideration”.
 - b. The second recommendation proposed ways to develop a Tarras community development agreement. MGL responded with “This comment does not provide a specific alternative condition or amendments and as such, we have not considered this matter further due to the compressed timeframes, and no changes to the conditions have been made at this time.” While ST is a community ‘lay-person’ group and may not have used planners’ terminology, we did make the effort to suggest conditions to assist MGL. Some examples are:
 - Evacuation planning and community engagement developed with the community.
 - Unfettered access to data in real time on a community-owned dashboard / website, including dust, noise, vibration, wind, water etc.
 - In addition to the independent technical advisory group, establishment of a Tarras community group.
42. We think our suggestions are reasonable and feasible and we have further developed them as proposed consent conditions for the Panel to consider.

²² https://www.fasttrack.govt.nz/data/assets/pdf_file/0016/23542/Sustainable-Tarras-Comments.pdf p.24 – Table 1 (Governance) and p.35 – Table 3 (Community development agreement and funding)

²³ https://www.fasttrack.govt.nz/data/assets/pdf_file/0010/31402/18-June-2026-Planning.pdf p.47-49

²⁴ https://www.fasttrack.govt.nz/data/assets/pdf_file/0017/24236/Part-3-03-Comments-Received-from-Environmental-Groups-17-April-2026.pdf para 47, p.47 and para 53, p.48

Ngā mihi nui,

Suze Keith
Chair
Sustainable Tarras
7 September 2026