New Zealand
MINERALS
COUNCIL

17 April 2026

Re: Reefton Resources Pty Limited Auld Creek Project Fast-track Approvals Referral Application

To whom it may concern,

Attached please find a submission from the New Zealand Minerals Council in support of the above application, outlining the mining industry in New Zealand and contextualising this application within that.

This project has significant regional and national benefits for New Zealand and will make a valuable contribution to meeting the goals of the New Zealand Government's minerals strategy.

Yours sincerely,

Josie Vidal
CEO
New Zealand Minerals Council
s 9(2)(a)

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Submission from the New Zealand Minerals Council On the Reefton Resources Pty Limited Auld Creek Project Fast-track Approvals Referral Application 17 April 2026

Introduction

1. The New Zealand Minerals Council is the industry association representing mining in New Zealand. It is a not-for-profit organisation, funded by members in the minerals and mining sector.
2. Members include mining companies, explorers, researchers, and service providers that support the extractives industry.
3. No AI was used in the writing of this submission, and the minerals council is happy to discuss any aspect of it.
4. This submission will outline the big picture of mining in New Zealand and its valuable contribution to communities and the economy. This is to contextualise the contribution the Auld Creek Project and Reefton Resources Pty Limited (hereby referred to as Rua Gold) will make in a region with a rich history of mining, as well as to the wider New Zealand economy.
5. We do not intend to submit on detailed technical aspects of the project. We will, however, make some references as to how Rua Gold follows normal mining practices and engagement.
6. It is important to note that the Auld Creek Project is managed by experienced, qualified and well-credentialed experts in exploration and underground gold mining.

Mining in New Zealand

7. To contextualise the contribution the Auld Creek Project will make, it is important to understand mining in New Zealand.
8. Almost every aspect of our modern lives relies on mined minerals or mineral products. Mining is a key part of the primary production sector in New Zealand. If we do not mine what we have in New Zealand, we lose the opportunity to generate jobs and earn export receipts.
9. In January 2025, the New Zealand Government released A Minerals Strategy for New Zealand to 2040 and A Critical Minerals List for New Zealand.
10. This critical minerals list was the first of its kind for this country and it lists 37 critical minerals, including gold and antimony. Gold is used for electronics, telecommunications, and in medical diagnostics, as well as jewellery, and as a store of value. Antimony is used in flame retardants, batteries and energy storage, electronics and semiconductors, medical and chemical applications, and defence and security.

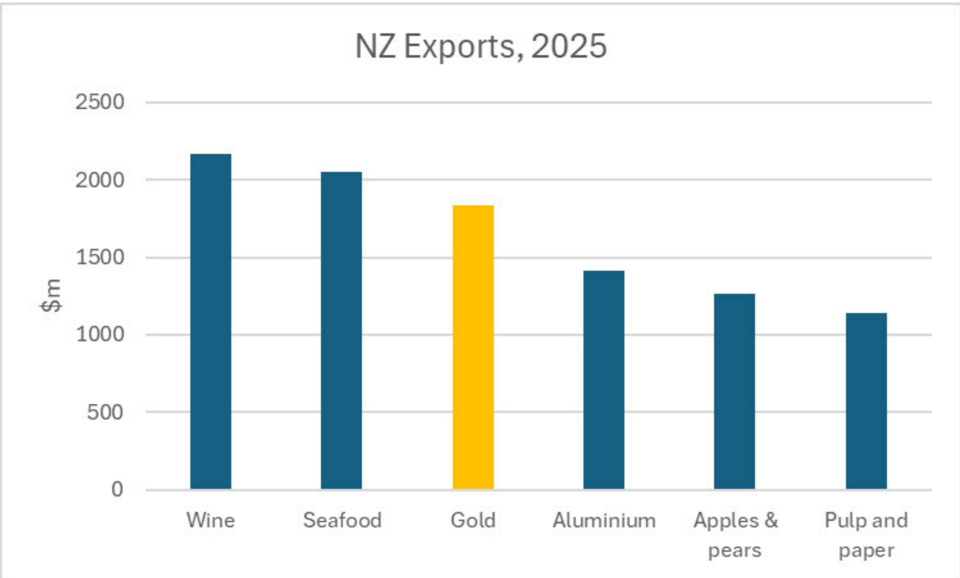
11. The strategy projects an export-led growth pathway for mining towards a goal of doubling annual mineral exports to $3 billion by 2035. Doubling exports will likely come from a combination of the high value of minerals mined and new production, such as the Auld Creek Project.
12. Given the interest in mining in New Zealand from investors, we believe this goal is not only achievable, but that it can be bettered.
13. The New Zealand Government sees mining as an important contributor to the economy, with potential for growth and as a consequence, about 2,000 more high paying jobs in the next five to 10 years.
14. New Zealand has one of the most regulated mining jurisdictions in the world and that is a good thing. In a world where consumers are increasingly interested in the provenance of their purchases, mining has an impressive story to tell. We have some of the strictest employment and health and safety standards in the world, and some of the most stringent environmental standards.
15. Most human activity has some kind of footprint and in mining, environmental impacts are managed by an effects-based approach. This starts with avoiding impacts where possible, and extends through minimising, remedying, offsetting, and compensation.
16. Mining is temporary. When projects are completed, the land is returned to a restored, or enhanced, state. Often the restoration is undertaken through the life of the mine, transforming areas as they are finished with for mining. Planning for mine closure is part of the permitting process.
17. An example is the remediated OceanaGold Globe Progress mine site near Reefton on the West Coast of the South Island. This has been turned into a public recreation area including 22km of cycling and walking tracks, showcasing recent mining heritage. This is Department of Conservation (DOC) land and has been handed back to DOC as a community asset. You can read DOC's announcement about it here. OceanaGold explains the project here.

What we mine

18. In New Zealand primarily we mine:
    - Gold
    - Thermal coal
    - Coking coal
    - Ironsands
    - Limestone
    - Silver
    - Mineral sands
    - Rock and sand (aggregates)
19. There are two gold hard rock mines in production, a gold mine close to production (Endura's Snowy River mine on the West Coast of the South Island), and several smaller alluvial gold mines.
20. Mining can take place on private land, or on Crown Land. Essentially, it must take place where the minerals lie, and it must be economically viable to mine those minerals.
21. Unlike many of the mines in Australia which operate with a fly-in fly-out (FIFO) workforce, New Zealand's mining workforce tends to live within easy travelling distance of the mines they work in. They are part of local communities and that's where they spend their wages.

Economics

22. Mining in New Zealand contributes **$2.07 billion** to the Gross Domestic Product (GDP) (Shamubeel Eaqub, economist).
23. Mining is 16.6% of the Buller District's GDP (Infometrics Regional Economic Profile Buller District 2025) second to Agriculture, forestry and fishing on 17.9%.
24. Mining is one of the most productive sectors of the New Zealand economy. **$458,952** is the value of what is produced per full time equivalent worker, compared with **$174,045** across the whole economy. (Infometrics Sector Profile 2025, Mining and Exploration).
25. The extractives sector employs **5,870 people** (2024) (MBIE data).
26. 23% of the mining and exploration workforce is Māori - a is much higher proportion than for Māori in the workforce as a whole (14%). (Infometrics, Māori Sector Profile 2025, Mining and Exploration) The annualised median income of Māori in mining is **$122,200**, compared with the **$66,560** Māori earn in all sectors. (Stats New Zealand)
27. Women make up 14.8% of the mining and exploration workforce. (Infometrics Sector Profile 2025, Mining and Exploration)
28. Gold and metallurgical coal are our main exports from mining, so they are critical to the Government's goal of doubling the value of our mineral exports to $3 billion by 2035. Gold exports were **$1.8 billion** in 2025 (Stats New Zealand) and gold is the number one goods export to Australia.
29. The graph below shows how gold compares with other New Zealand exports. Mining exports in total now exceed wine and seafood.



Royalties, rates and taxes

30. Mining companies make a number of payments to the Government including royalties, as the Crown effectively "owns" the minerals. In 2025, **$19.6 million** was paid in royalties.
31. New Zealand uses a dual royalty system based on two percent of the net sales revenue of the minerals obtained, or 10 percent of the accounting profits. This is paid into the New Zealand Consolidated Fund for general Government spending.
32. More significant than royalties are the taxes paid by mining companies – corporate income tax (28 percent), PAYE, GST, and ACC; fees to access and use Crown land; and fees paid to New Zealand

Petroleum and Minerals for permits. Considerable fees are paid for resource consent applications and to the Environmental Protection Authority (EPA) for fast-track applications.

33. Mining companies also pay significant rates to local authorities and whatever other fees such local authorities agree on. They are often among the largest ratepayers in provincial districts.

Investment

34. Getting from prospecting to mining is a long and expensive process. Mining is New Zealand is an attractive investment because we have relatively stable government and rules, regulations, and laws that provide suitable safeguards.
35. The level of capital required does not sit in New Zealand which is why most large-scale mines have overseas investors/owners.
36. However, it is incorrect to say that as a consequence of that investment model, all the returns flow offshore.
37. Generally, most of the revenue generated by the mine stays in New Zealand in the form of payments to suppliers, wages, contractors, royalties, taxes, rates and spend on plant and machinery and in some instances, housing for miners. After these expenses, profits, which are a relatively small proportion of gross revenue, are retuned to shareholders, many of whom reside in New Zealand.

Environment

38. Mining does not have to be at the expense of the environment.
39. In fact, mining companies often work with conservation groups and the Department of Conservation to protect and enhance indigenous biodiversity on mine sites.
40. Mining companies employ environmental managers/ecologists to ensure they meet all the rules, regulations, and laws they must abide by through the life of the mining project.
41. The mining sector supports New Zealand's high environmental standards and neither wants nor sees the fast-track legislation as undermining these.
42. Members of the New Zealand Minerals Council – of which Rua Gold is one – sign up to a charter, the purpose of which is:

    Enable socially and environmentally responsible mining, providing minerals for a sustainable and resilient future and enduring value for all New Zealanders.

43. The charter also includes reference to the environment:

    New Zealand Minerals Council members aim for a net positive impact on the environment. We recognise that our activities make a mark on the land, and we look for methods and management approaches to realise a net environmental benefit.

44. Negative perceptions about mining's environmental impacts are often based on mining's past, or mining in jurisdictions where there is little oversight of working and environmental conditions and are not supported by evidence.
45. Things have changed as society's/the community's standards have risen and with the use of continually improving science and technology, modern exploration and extraction of minerals in New Zealand are undertaken with care and responsibility, bound by many rules, regulations and laws.
46. Miners will continue to spend hundreds of thousands of dollars on predator control to protect indigenous biodiversity, run breeding programmes for kiwis, protect wildlife on and around mining

sites, spend millions of dollars on planting the right plants where they have previously mined, protect waterways with innovative water management, and generally, quietly go about excellent environmental management of mines.

47. Let's also not pretend that mining is the only industry that has an impact on the environment and on freshwater. In fact, mining is possibly the most regulated in that regard and any water that leaves a mine site and enters a waterway must meet appropriate regulations which are monitored by local authorities. If it doesn't, there are consequences, including fines.
48. One of the many environmental safeguards are mine closure plans. You cannot just mine and walk away. Mining companies here spend millions of dollars restoring mine sites close to a pre-mining state and sometimes to become community assets, as the OceanaGold Globe Progress mine rehabilitation example above explains. Those dollars are spent on conservation, predator and pest control, and restoring biodiversity throughout the life of the mine. This is, in fact, one of the many conditions of mining permits.

Water treatment

49. Examples of New Zealand mining's international excellence in environmental management, specifically water management, can be found on many mine sites and here are examples of two water treatment options developed here.
50. OceanaGold's passive water treatment option employed in its Globe Progress mine closure was the subject of a research presentation at the 2022 International Mine Water Association conference. This video explains how it works.
51. A low-tech water management system employed at a number of mines recycles discarded mussel shells for the passive treatment of acid mine drainage (AMD) using an up-flow mussel shell reactor. This was detailed in a research presentation at the 2022 International Mine Water Association conference. This video explains how it works.

Processes

52. The primary law governing mining is the Crown Minerals Act.
53. As per this act, miners must obtain permits from New Zealand Petroleum & Minerals, which sits within the Ministry for Business, Innovation and Employment. There are different permits, with different sets of conditions, for the three phases of mining, that is, prospecting, exploration, and minerals mining.

Community engagement

54. There is a long time between getting the first permit and setting up a mine. Responsible mining companies start engaging with the communities around their potential mine early in the process (prospecting/ exploration).
55. Part of this will be regulated, but mostly it is to ensure miners understand the views / perspectives of the communities and communities understand the opportunities and potential issues that will come with development in their area.
56. In New Zealand, we also have obligations under the Treaty of Waitangi. Mining companies understand the importance of engaging with relevant iwi and hapū.

57. Mines bring high paying jobs and significant opportunities to their local communities. As employers of mostly local people, mining companies are invested in the community and often make significant and ongoing contributions to community assets and projects.

Rua Gold's engagement

58. Rua Gold has been actively engaging with the community and stakeholders on the West Coast with a strong focus in Reefton.
59. From late 2025, the company has held public meetings and establishment of a monthly newsletter to stakeholders. Engagement is ongoing and includes:
    - Rua Gold is very active on social media with information videos and facts about the project. It launched the Rua Gold – Reefton Operations Facebook page in late 2025 for community updates (800 followers).
    - The company has opened a shop front on the main street of Reefton, to engage with the public when the public want to engage, with information and personnel available.
    - It has held more than 300 stakeholder engagements to date with a broad range of stakeholders in the community and iwi.
    - Rua Gold engages with mainstream media and provides briefings to local, regional and central government agencies.

Rua Gold's investment in the community

60. Since 2025, Rua Gold reports it has invested or committed to approximately $50,000 in community organisations and projects across the region. This is long before the company is at the stage of making any money. This investment includes:
    - Rua Gold was the principal sponsor of the Reefton Christmas on Broadway event in 2025 and has committed to 2026.
    - Partnership with Development West Coast for Nature Economy project.
    - Sponsor of St Johns Youth cadets, Reefton Fire Brigade, Reefton A & P show, and the Reefton Trail collective which maintains Department of Conservation pathways.
    - Sponsorship of a Masters degree student at Canterbury University focusing on water management.
    - Commitment to use Reefton / West Coast businesses to support Rua Gold's operations including leasing cars, mobile equipment, fuel, rental properties, commercial properties, signage, clothing, safety equipment, tooling, maintenance and repairs.

Fast-track law and mining

61. The fast-track law is ideal for the large-scale, complex nature of mining projects which span rules, regulations and laws across central and local government jurisdictions. It provides a one stop shop without bypassing the environment.
62. In an economy constrained by low productivity, mining is the sector with the highest productivity. This translates into high wages which are spent in local communities.
63. Mining is capital-intensive and it takes a long time to get through the myriads of processes and regulations to physically start mining and get a return on that very large investment. While it is

appropriate there are checks and balances, it should not take 10 years and cost millions of dollars to reach this stage, as time delays can turn off investors.

64. Because mining has to abide by so many rules, regulations and laws, the gold in the fast-track law is the one-stop-shop approach to considering the project holistically.
65. Allowing the suite of approvals under different legislation to be considered in one place (a one-stop shop), is the main benefit of the act for anyone working on projects with significant regional or national benefits.
66. It brings approvals and condition setting under the following acts into one place, which is more efficient and timelier. Importantly for mining, it also removes different levels of subjectivity, productivity, resourcing, and willingness to engage with mining across the various departments that implement these acts:

   - Resource Management Act
   - Crown Minerals Act
   - Conservation Act
   - Reserves Act
   - Wildlife Act
   - National Parks Act
   - Heritage New Zealand Pouhere Taonga Act
   - Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act

67. Many issues are caused by the Wildlife Act 1953 which is outdated and not fit for purpose when it comes to modern, large-scale development.
68. New Zealand Minerals Council submitted on the Fast-track Approvals Bill (as Straterra, before name change to New Zealand Minerals Council) and the Fast-track Approvals Amendment Bill.

Conclusion

69. In conclusion, the New Zealand Minerals Council advocates that New Zealand has minerals, and we should be able to mine them to meet global demand. This is done within strict employment and health and safety laws and stringent environmental regulations which we support.
70. We contend, that like many things, New Zealand does this better than most.
71. Mining is a burgeoning industry in New Zealand with investment interest and potential for modest growth – there won't be a mine on every corner. That growth should be welcomed in a country struggling with low productivity, anaemic economic growth, and high unemployment.
72. The Auld Creek Project is expected to be a great contributor to regional and national economies, as outlined in Rua Gold's application.
73. Mining gold and antimony in New Zealand stacks up in regional and national benefits, as outlined above.
74. Trading partners are keen for New Zealand to join global supply chains for critical minerals.

NGĀTI WAEWAE ARAHURA
TE RŪNANGA O NGĀTI WAEWAE

16 February 2026

Environmental Protection Authority
Stewart Dawson's Corner
366 Lambton Quay
Wellington 6011
New Zealand

Tēnā koe,

Referral application for the Auld Creek Project under the Fast Track Approval Act 2025 – information from Te Rūnanga o Ngāti Waewae

This letter is provided on behalf of Te Rūnanga o Ngāti Waewae. Te Rūnanga o Ngāti Waewae is the legally recognised representative body for Ngāti Waewae, a member of Te Rūnanga o Ngāi Tahu.

It is understood Rua Gold intends to file a referral application for the Auld Creek Underground Mine Project under the Fast Track Approvals Act 2025.

Ngāti Waewae holds mana whenua over Te Tai o Poutini where the Project will be located.

The purpose of this letter is to confirm that Ngāti Waewae have been engaging extensively with Rua Gold throughout the Auld Creek Project. This engagement is ongoing and has included regular meetings and discussion throughout the Projects development and refinement. In respect of the Project and the associated referral under the Fast Track Approvals Act, Ngāti Waewae supports the application.

Ngāti Waewae will continue to work closely with Rua Gold throughout the referral and approval process to ensure mana whenua views are effectively incorporated into the Project. Ngāti Waewae expect to be invited to provide comments on the application under section 17 of the Fast Track Approvals Act and work alongside the responsible agency in preparation of the report on Treaty settlements and other obligations under section 18 of the Fast Track Approvals Act.

Nō reira, mauri tū, mauri oho, mauri ora,

Nāku noa

Nā Francois Tumahai
Chairman
Te Rūnanga o Ngāti Waewae
s 9(2)(a)

Te Rūnanga o NGĀI TAHU

7 April 2026

Environmental Protection Authority
Stewart Dawson's Corner
366 Lambton Quay
Wellington 6011
New Zealand

Tēnā koe,

Auld Creek Project Referral application under the Fast Track Approval Act 2024 – information from Te Rūnanga o Ngāi Tahu.

This letter is provided on behalf of Te Rūnanga o Ngāi Tahu ("**Te Rūnanga**") in relation to the referral application by Rua Gold under the Fast Track Approvals Act 2024 ("**Fast Track Act**") to establish a new underground mine, to be known as the "Auld Creek Project" ("the **Project"**).

Te Rūnanga was created under the Te Rūnanga o Ngāi Tahu Act 1996 as the tribal servant, protecting and advancing the collective interests of the iwi. Te Rūnanga encompasses five primary hapū being and 18 Papatipu Rūnanga, who uphold mana whenua and mana moana for their rohe. Mana whenua are the only people who can describe the values and aspirations for their wāhi tapu and wāhi taonga. Te Rūnanga is responsible for managing, advocating for and protecting the rights and interests inherently held by Ngāi Tahu whānui as mana whenua.

Notwithstanding its statutory status as the representative voice of Ngāi Tahu whānui, Te Rūnanga accepts and respects the rights of individuals and Papatipu Rūnanga to make their own responses as representatives of mana whenua. On this basis, in relation to the Rua Gold Project, Te Rūnanga refers to Ngāti Waewae in relation to the proposal, ensuring that mana whenua views are incorporated into the project.

Te Rūnanga o Ngāi Tahu
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Ngāti Waewae have been engaging with Rua Gold and the expectation of Te Rūnanga is this will continue and information will be sufficient to enable mana whenua to provide comments that inform the referral application in accordance with Section 13(4) of the FTAA.

Ngā mihi

Ben Bateman

Chief Executive

Te Rūnanga o Ngāi Tahu

BULLER DISTRICT COUNCIL
Te Kaunihera O Kawatiri

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Phone 03 732 8391

16 March 2026

To whom it may concern

This letter is provided by the Mayor of the Buller District Council.

It is understood Rua Gold intends to file a referral application for the Auld Creek Underground Mine Project under the Fast Track Approvals Act 2025.

Buller District Council is the local government authority for the land where the Auld Creek project is located, near Reefton.

The purpose of this letter is to confirm that Buller District Council have been engaging with Rua Gold throughout the Auld Creek Project – at a staff and Governance level. This engagement is ongoing and has included regular meetings and discussion as the project has progressed and been refined.

Buller District Council will continue to work closely with Rua Gold throughout the referral and approval process to ensure proper briefing and incorporation of local consideration. The Council also expects to be invited to provide comments on the application under the Fast Track Approvals Act.

The Reefton gold fields play a pivotal role in Buller's economy, and the provision of new employment opportunities, both direct and indirect are important for the continuing resilience and sustainability of our region. The Auld Creek Project has the potential to contribute positively to this economic landscape, including supporting local businesses, contractors, and service industries.

In respect of the Project and the associated referral under the Fast Track Approvals Act, I as Mayor, support Rua Gold's application and look forward to the continued positive working relationship between the industry and Buller District Council.

Yours sincerely

Mayor Russell

DEVELOPMENT
WEST COAST

Te Ohu Whakawhanake o Te Tai Poutini

[redacted]

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