Your written comments on a project under the Fast Track Approvals Act 2024

Project name	FTAA-2604-1206 Auld Creek Project

Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

All sections of this form with an asterisk (*) must be completed.

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	Buller District Council		
***First name**	Simon		
***Last name**	Bastion		
Postal address	PO Box 21, Westport 7866		
***Contact phone number**	s 9(2)(a)	**Alternative**	0800 807 239
***Email**	s 9(2)(a)		

2. Please provide your comments on this application
Written comments are provided on Pages 1-5 of the attached feedback.
If you need more space, please attach additional pages. Please include your name, page numbers and the project name on the additional pages.

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

Managers signoff

Simon Pickford Date: 27 May 2026

Chief Executive Officer - Buller District Council

Simon Bastion Date: 27 May 2026

Group Manager Regulatory Services - Buller District Council

BULLER DISTRICT COUNCIL
Te Kaunihera O Kawatiri

Westport office
6-8 Brougham Street, PO Box 21
Westport 7866, New Zealand
Freephone 0800 807 239
Phone 03 788 9111

Reefton Visitor & Service Centre
67-69 Broadway, PO Box 75
Reefton 7851, New Zealand
Phone 03 732 8821
Phone 03 732 8391

27 May 2026

Fast-track Referrals
Via Fast-track portal

FTAA-2604-1206 Auld Creek Project Referral Response

Thank you for the opportunity to provide comments on the referral application for Reefton Resources Pty Limited's Auld Creek Project (the 'Project').

Overview
Buller District Council (BDC) is satisfied that the applicant has engaged with Council on relevant aspects of the proposal.

BDC supports referral of the Project, recognising that the benefits associated with the project are 'significant' in the context of the West Coast Region.

In response to the 8th of May 2026 invitation to provide comments, BDC's responses to specific questions on the referral application are as follows:

<u>Question 1</u>
Under section 17(3) of the Act, BDC must provide comments advising on the following matter:

1. *Any applications that have been lodged with the Council that would be a competing application or applications if a substantive application for the project were lodged. If no such applications exist, please provide written confirmation.*

Council Response:
Based on a review of Council records, I confirm that no competing applications have been identified.

<u>Questions 2 and 3</u>
Please ensure any comments you choose to provide are specific to this particular referral application, and linked to the Minister's decision making criteria as set out in sections 21 and 22 of the Act. In this regard we are particularly interested in comments you might have on the following matters:

2. *Whether you consider the project may involve an ineligible activity, and if so, why (as defined in section 5 of the Act)*

3. *Whether you consider any of the reasons to decline a referral application may be applicable to this application, and if so why (under section 21 of Act).*

Council Response:

Ineligible Activities

Based on the referral application documentation, the Project does not involve any ineligible activity as defined under section 5 of the FTAA.

In particular, the application identifies that the Project is not proposed on Schedule 4 Crown Minerals Act land, Māori customary land, protected customary rights areas, or other categories of land or activities identified as ineligible under section 5 of the FTAA. BDC has no information at this stage that would suggest otherwise.

Grounds to Decline Referral

Sections 21(3), (4) and (5) of the FTAA set out when the Minister may/must decline a referral application. With respect to these criteria and based on the information provided, BDC does not consider that any of the grounds to decline referral apply.

In particular, the information provided is considered adequate to inform a referral decision on the consenting aspects of the proposal and Council has not identified any reason why the resource consents sought should not be considered under the FTAA process.

The adverse effects of mining activities are well understood, notably there is a similar underground mining operation located approximately 17km south of the Auld Creek Project (Snowy River Mine). While BDC does not have sufficient information to determine the level of any actual or potential environmental effects for the Project, it is anticipated, with appropriate design and conditions, that the effects can be managed to appropriate levels in relation to any consent approvals. A full effects assessment will need to be addressed as part of a substantive application.

Notably, a project of this scale has the potential to generate significant workforce accommodation demand in and around Reefton. Given existing housing supply constraints within the township, there is potential for increased pressure on residential accommodation, rental availability, visitor accommodation and local infrastructure unless these matters are appropriately planned for and managed. While Council anticipates that such effects are capable of being addressed through detailed assessment and mitigation measures, any substantive application should clearly demonstrate how workforce accommodation demand and associated social effects will be managed.

Referral Assessment Criteria

Sections 22(1) and (2) of the FTAA set out the criteria for the Minister for accepting a referral application. BDC has considered these criteria with comments provided below:

Does the project have significant regional or national benefits?

The referral application demonstrates that the Project is of a nature and scale and capable of delivering significant regional and national benefits, particularly in relation to regional employment, economic activity, mineral development, and contribution to New Zealand's critical minerals sector.

Would referring the project facilitate its delivery in a more timely and cost-efficient way than under normal circumstances?

The referral of the project would likely facilitate delivery in a more timely and cost-efficient manner than standard approval pathways. BDC notes that where a hearing is required, consents of this nature can take approximately 12-18 months to process, which is significantly longer than the FTAA process is expected to take.

The proposal requires a broad range of approvals across multiple statutory regimes. The integrated nature of the FTAA process appears well suited to coordinating these approvals, reducing duplication across separate approval pathways, ensuring timely decision making and a cost effective process.

Is the referral unlikely to materially affect the efficient operation of the fast-track approvals process?

The Project is unlikely to materially affect the efficient operation of the fast-track approvals process.

In BDC's view, the economic benefits of the proposal have been adequately demonstrated, and mining activities and the associated potential adverse effects are well understood forms of development within the West Coast region. Council notes the application is supported by a broad suite of technical reports and identifies that further detailed assessments will accompany any substantive application.

Has the project been identified as a priority project in any central government, local government, or sector plan or strategy, or a central government infrastructure priority list?

The Auld Creek Project has not been identified as a priority project within a local authority plan or strategy and the proposal does not involve an infrastructure project in terms of any central government priority list.

However, Council notes that the proposal aligns with the Government's Minerals Strategy for New Zealand 2040 objectives, including with respect to development of New Zealand's mineral resources, increasing export value, and supporting the critical minerals sector.

Will the project deliver new or support existing regionally/nationally significant infrastructure?

No. The Project does not relate to regionally or nationally significant infrastructure.

Will the project increase housing supply, address housing needs or contribute to well-functioning urban environment?

No. The Project does not contribute to housing supply and is not located in an urban environment in terms of the National Policy Statement on Urban Development.

Will the project deliver significant economic benefits?

Yes. BDC considers the Project is likely to deliver significant economic benefits at both a regional and national scale.

The referral application identifies substantial projected export earnings, employment generation, economic activity and broader economic multipliers associated with construction and mining operations. Council considers these benefits are likely to be particularly significant within the Buller District and wider West Coast region.

Will the project support primary industries (e.g. aquaculture)?

Yes. Council considers the Project would support New Zealand's mining industry, which is recognised as a primary production industry in terms of the National Planning Standards 2019.

The proposal would contribute to continued investment and employment within the minerals sector and support associated industries and service providers within the Buller District and the wider West Coast region.

Will the project support development of natural resources (e.g. minerals, petroleum)?

Yes. The Project directly relates to the development and extraction of mineral resources; specifically gold and antimony deposits located near Reefton.

It is noted that gold and antimony are identified on the government's Critical Minerals List, being minerals essential to New Zealand's economy and technological needs, including clean energy and international trade.

Will the project support climate change mitigation (e.g., reduce/remove greenhouse gas emissions)?

No. However, Council notes the application identifies that antimony is used in a range of technologies associated with renewable energy systems and energy storage applications. To that extent, the Project may indirectly contribute to broader climate related objectives.

Will the project support climate change adaptation or recovery from natural hazard events?

No. The Project will not directly support climate change adaptation or recovery from natural hazard events.

Will the project address significant environmental issues?

No. The Project will not address any significant environmental issues.

Will the project promote competition in the grocery industry?

Not relevant to the Project.

Is the project consistent with local or regional planning documents (e.g. spatial strategies)?

BDC's preliminary high-level assessment, is that the Project is broadly consistent with the relevant regional and district planning framework, including the proposed Te Tai o Poutini Plan (TTPP), operative Buller District Plan (BDP) and West Coast Regional Policy Statement. Mining activities are an established industry within the Buller District and wider West Coast region, and the relevant planning documents contain objectives and policies recognising the importance of mineral resource development while seeking to appropriately manage adverse environmental effects.

The Project is located partly within sensitive environments, including conservation land and areas with indigenous biodiversity values. Detailed assessment of the Project’s consistency with relevant statutory planning documents is expected to accompany any subsequent substantive application.

Summary

BDC does not consider that the Project involves any ineligible activity and can identify no reasons to decline the referral application.

Simon Bastion

Group Manager Regulatory Services
Buller District Council

Your written comments on a project under the Fast Track Approvals Act 2024

Project name	Auld Creek REQ003278W4T5

Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

All sections of this form with an asterisk (*) must be completed.

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	West Coast Regional Council		
***First name**	Rachel		
***Last name**	CLARK		
Postal address			
***Contact phone number**	s 9(2)(a)	**Alternative**	
***Email**	s 9(2)(a)		

2. Please provide your comments on this application
Please see attached letter

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

Managers signoff

Steven May

Consent Manager Date 22/05/2026

WEST COAST
REGIONAL COUNCIL

388 Main South Rd, Paroa
P.O. Box 66, Greymouth 7840
Phone (03) 768 0466Toll free 0508 800 118
Email: info@wcrc.govt.nz

18 May 2026

Fast-track Referrals
Via Fat-track portal

FTAA-2604-1206 Aul Creek Project Referral Response

Thank you for your invitation to provide written comments, dated 8 May 2026.

Under section 17(3) of the Act, the West Coast Regional Council (WCRC) advises that there have been no applications lodged that could be considered competing applications to this project, should a substantive application be lodged.

Furthermore, there are no existing resource consents to which sections 124C(1)(c) or 165ZI of the Resource Management Act 1991 could apply.

The WCRC does not consider that the Auld Creek Project involves any ineligible activity and can identify no reasons to decline the referral application.

Matt Smith
Group Manager – Regulatory & Policy

Hon Nicola Willis

Minister of Finance
Minister for Economic Growth
Minister for Social Investment

25 MAY 2026

Hon Chris Bishop
Minister for Infrastructure
Parliament Buildings
Wellington

REQ-0032819

Dear Chris

Thank you for the opportunity to comment under the Fast-track Approvals Act 2024 (the Act) on referral application Auld Creek Gold–Antimony Project, FTAA-2604-1206. I am providing comment in my capacity as Minister for Economic Growth, focusing on whether the application is likely to deliver significant economic benefits under section 22(2)(a)(iv) of the Act, based on the information provided.

Auld Creek Gold–Antimony Project, FTAA-2604-1206

The proposal is to establish and operate a new underground gold and antimony mine approximately three kilometres south of Reefton in the Buller District, in the West Coast Region. This application is to develop New Zealand's largest known antimony deposit alongside gold production using modern underground narrow-vein mining methods. The application seeks approvals for a mining permit, related access arrangements, resource consents, and Wildlife Act approvals, with construction proposed from 2027 and mining operations commencing from late 2028 for an estimated six-to-eight-year production period.

The economic assessment provided by the applicant estimates total capital investment of approximately \$631 million, with around 90 per cent funded offshore. During operations, the project is estimated to generate average export revenue of approximately \$284 million per annum from gold and antimony exports, with total export revenue of approximately \$2.3 billion over the mine life. The assessment estimates an average total GDP contribution of approximately \$403 million per year during production, with material regional impacts, including an estimated increase in Buller District GDP of around \$46 million per year on average (equivalent to six per cent of current district output).

The project would support around 200 direct jobs on average during operations, rising to approximately 267 direct jobs at peak production, with wider indirect and induced employment effects across the West Coast and nationally. The primary economic benefits are the increased export earnings, foreign direct investment, and ongoing operational activity, rather than short-term construction effects. The project would allow domestic antimony production, a mineral on New Zealand's Critical Minerals List, strengthening supply-chain resilience.

Private Bag 18041, Parliament Buildings, Wellington 6160, New Zealand | +64 4 817 6801 | n.willis@ministers.govt.nz

On this basis and having regard to the information provided by the applicant, the proposal may be assessed as having the potential to deliver significant regional and national economic benefits under section 22(2)(a)(iv) of the Fast-track Approvals Act.

Yours sincerely

Hon Nicola Willis
Minister for Economic Growth

Hon James Meager

Minister for the South Island
Minister for Hunting and Fishing
Minister for Youth
Associate Minister of Transport

2 9 MAY 2026 JMITC - 53

Hon Chris Bishop
Minister for Infrastructure

By email: infrastructure.portfolio@parliament.govt.nz

Fast-track Approvals Act referral application – Auld Creek Project – FTAA-2604-1206

Dear Minister Bishop,

Thank you for the opportunity to comment on Auld Creek Project's referral application under the *Fast-track Approvals Act 2024* (FTAA 2024) for the Auld Creek Project.

Rua Gold, through its wholly owned subsidiary, Reefton Resources Pty Limited, has applied for fast-track approval to develop the Auld Creek Gold-Antimony Project in Reefton.

The proposal is for a mining development with the objective to bring New Zealand's largest known antimony resource into production. The applicant is seeking authorisations for the integrated development of the deposit, together with associated infrastructure and mining activities. The project is currently planned in two phases. Phase one includes the development of infrastructure on Crown land to access and mine the top of the deposit. Phase two includes access to and mining of the remaining deposit through Ngāi Tahu Forestry land. The development also includes a processing plant and related surface infrastructure to process gold and antimony into a mineral concentrate for further processing off site.

The Auld Creek deposit is located beneath Victoria Forest Park, approximately 3 kilometres south of Reefton on the West Coast. Supporting infrastructure is proposed to be located on top of or adjacent to the mine itself. The development would support the New Zealand Minerals Strategy to 2040 by scaling up antimony development. Antimony is identified in New Zealand's inaugural Critical Minerals List, released in January 2025. It will also support the strategy by expanding gold exports and domestic processing.

Rua Gold has provided an economic assessment to support its application for the Auld Creek Project:

a. Over the life of the project, the total gross domestic product (GDP) contribution from the mine's New Zealand-based spending averages \$403.00 million per year across the production period. Over the full project life, the total GDP contribution reaches \$3.63 billion, with a net present value of \$2.46 billion.
b. Based on a range of assumptions, estimated export revenue is expected to be \$217.00 million and \$67.00 million for gold and antimony, respectively. Total export revenue over the production period is estimated at \$2.27 billion, with a net present value of \$1.64 billion. This well exceeds the \$100 million annual threshold the Minerals Strategy identifies as the benchmark for a significant mining operation.
c. Once operational, the development is expected to contribute an average of \$46 million annually to the GDP of the Buller District, equivalent to 6 per cent of the district's current output. The project is forecast to sustain 200 direct full-time employees, rising to 267 at peak production in 2028-2029.

I have considered the information provided and its alignment with the priorities of my South Island portfolio. Given the scale of the projected economic benefits, including raising export values, GDP growth, job creation and regional investment, I consider the project will deliver significant regional and national economic benefits.

The application has clear implications for regional economic development, and commentary from the Economic Growth, Regional Development and Resources portfolios may also be relevant in assessing the strategic importance of the project.

Yours sincerely

Hon James Meager
Minister for the South Island
Minister for Hunting and Fishing
Minister for Youth
Associate Minister of Transport

Hon Tama Potaka

Minister of Conservation
Minister for Māori Crown Relations
Minister for Māori Development
Minister for Whānau Ora
Associate Minister of Housing

27 May 2026

By email: infrastructure.portfolio@parliament.govt.nz

Tēnā koe Minister Bishop,

Invitation to comment on the Auld Creek project under the Fast-track Approvals Act 2024

Thank you for the invitation to comment on the **Auld Creek** project under section 17 of the Fast-track Approvals Act 2024.

I have considered the application and its alignment with my portfolios as Minister for Māori Crown Relations: Te Arawhiti and Minister for Māori Development.

I support the application progressing and I encourage the applicant and the panel to have due regard to:

- relevant Treaty settlement legislation and instruments; and
- any feedback received from relevant Māori groups, as set out in the Treaty settlements and other obligations (Section 18) report prepared by the Ministry for the Environment.

Nāku noa, nā

Hon Tama Potaka
Te Minita mō Te Arawhiti me Te Minita Whanaketanga Māori
Minister for Māori Crown Relations: Te Arawhiti and Minister for Māori Development

Hon Shane Jones

Minister for Oceans and Fisheries
Minister for Regional Development
Minister for Resources
Associate Minister of Finance
Associate Minister for Energy

2 June 2026

Hon Chris Bishop
Minister for Infrastructure
Parliament Buildings
Wellington

Fast-track Approvals Act 2024 – Auld Creek Project referral application (FTAA-2604-1206)

Dear Chris,

Thank you for the opportunity to comment on this referral application under the Fast-track Approvals Act 2024 (FTAA 2024).

The FTAA 2024 has been established to provide a regime that makes it easier and quicker for regionally and nationally significant infrastructure projects to gain the approvals needed for development, in support of this Government's economic growth objectives.

I have considered the application and its alignment with the priorities of my Regional Development and Resources portfolios. My comments are attached as Annex One.

Yours sincerely,

Hon Shane Jones
Minister for Regional Development
Minister for Resources

Annex One – Regional Development and Resources comments

Project overview

1. The Auld Creek Project application is for the integrated development of New Zealand's largest known antimony deposit, in Victoria Park (approximately three kilometres south of Reefton on the West Coast), together with associated infrastructure and mining activities over approximately 1009 hectares. The project also includes a processing plant and related surface infrastructure to process gold and antimony into a mineral concentrate for further processing off site.

2. The applicant Reefton Resources Pty Limited (Rua Gold) has provided an economic assessment of the project. Estimated benefits of the project include:

   a. A total increase in GDP averaging $403 million per year over the eight-year life of the mine.

   b. Annual additional export revenue of $217.00 million for gold and $67.00 million for antimony.

   c. Creation of 200 direct full-time jobs, rising to 267 at peak production in 2028-2029.

   d. Lift Buller District's annual GDP by an average of $46.3 million, or six per cent, and provide a further $29 million additional GDP to the rest of the West Coast region.

3. According to the economic assessment provided by the applicant, the average income per worker in the Buller District (where the project is located) is $66,000 per annum, whereas mining wages average well above $100,000.

Regional Development comments

4. Based on the economic assessment provided, I consider that the project will have significant regional economic benefits, in particular due to its GDP contribution to Buller District and the West Coast, and the number of local high-wage jobs created.

Resources comments

5. The Government's Minerals Strategy for New Zealand to 2040 sets a clear objective of doubling minerals export revenues to $3 billion annually by 2035, recognising the importance of the minerals sector to economic growth, regional development and export diversification.

6. Rua Golds Fast-track Approvals Referral Application and Economic Evidence report projects the mine will generate an average of $284 million in exports of gold and antimony annually, over the eight-year life of the project. Based on this, the project could make a nationally significant contribution to export receipts and materially support progress toward the Minerals Strategy's export growth target.

7. In January 2025, New Zealand published its first Critical Minerals List, which identifies minerals that are economically important to New Zealand and/or in demand by our international partners and are vulnerable to international or domestic supply disruptions. Both gold and antimony are on New Zealand's Critical Minerals List.

8. Antimony is used in flame retardants, batteries (including for electric vehicles), and in defence applications. The project is estimated by the applicant to produce up to 2,050 tonnes of stibnite (a mineral containing approximately 70 per cent antimony) each year. Production of antimony is highly concentrated in a small number of countries, which makes supply vulnerable to shocks. In this context, the project could contribute to diversifying global antimony supply outside of the current major producers.

9. Gold is also included on New Zealand’s Critical Minerals List, reflecting both its direct economic contribution and the way in which gold mining operations can underpin broader exploration activity and future development of minerals like antimony. Gold mining remains one of New Zealand’s most established and internationally competitive mineral activities, with a strong export focus and a demonstrated ability to attract international capital investment.

Your written comments on a project under the Fast-track Approvals Act 2024

Project name	Auld Creek

Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

All sections of this form with an asterisk (*) must be completed.

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name	Department of Conservation (DOC)		
***First name**	Bridgette		
***Last name**	Munro		
Postal address			
***Contact phone number**	s 9(2)(a)	**Alternative**	
***Email**	Fast-track@doc.govt.nz;		

2. Please provide your comments on this application
Comments follow overleaf.

Manager's signoff

Jenni Fitzgerald

29th of May 2026

Director-General of Conservation s17 comments

Project name	Auld Creek
Applicant name	Reefton Resources Pty Limited
Application number	FTAA-2604-1206
Project summary details	The Auld Creek Project ('the Project') is for the phased development and operation of a new underground mine for the extraction of gold and antimony for approximately 6-8 years from the Auld Creek deposit. The mining permit is proposed for a duration of 30 years. The Project area encompasses multiple sites covering an area of approximately 1,009 hectares ('ha') around three kilometres ('km') south of Reefton, within the Buller District of the West Coast Region. The Project area is accessed from Quigleys Road, south of State Highway 7. The Project is to be situated between a number of active and historic mines, including the OceanaGold Globe Progress Mine and the Endura Snowy River Mine. The Project will lie to the east of Devils Creek. The Mine Site includes Victoria Forest Park as Public Conservation Land ('PCL') administered by DOC and Forestry Land owned by Ngāi Tahu. The Surface Infrastructure Site is located on privately owned flat farmland and pasture. The Applicant seeks the following approvals under the fast-track approvals process to authorise the Project: • Resource consents under the Resource Management Act 1991 ('RMA'); • Concessions under the Conservation Act 1987; • Wildlife approvals under the Wildlife Act 1953; • An approval, a dispensation, or an authorisation for a complex freshwater fisheries activity under the Freshwater Fisheries Regulations 1983; • An initial access arrangement under the Crown Minerals Act 1991 ('CMA') and • A mining permit under the CMA.

1 General comment

1.1.1 The application was lodged 18 April 2026. As the Project includes approvals under the Conservation Act 1987 (including the Freshwater Fisheries Regulations 1983), the Wildlife Act 1953, and the Crown Minerals Act 1991 (as the Project area includes Crown land administered by DOC and the appropriate Minister for the relevant land is the Minister of Conservation), the Applicant was required to notify DOC in accordance with section 11 of the Fast-track Approvals Act 2024 (‘FTAA’).

1.1.2 In relation to this Project, the Applicant took steps to consult with DOC prior to lodging its Referral Application. DOC and the Applicant met to discuss the Project in mid-April 2026. DOC was unable to provide written feedback to the Applicant before it lodged its application only a matter of days later.

1.1.3 While DOC does not have sufficient information to determine the level of any actual and potential environmental effects, DOC considers that it is likely that with the appropriate design and conditions, effects can be managed to appropriate levels. If that is not possible, a Fast-track Panel would have the ability to decline the application if impacts were considered to be out of proportion to the Project’s benefits.

2 Minister’s decision on referral application

2.1.1 FTAA sections 21 and 22 set out matters to be considered in determining whether a referral application should be accepted.

2.1.2 DOC notes that other agencies are better placed to comment on most matters, including those in section 22. Comments below are limited to sections where DOC has specific interests or information relevant to the Minister’s decision.

2.1.3 For completeness, DOC has considered the criteria in section 22 and has not identified anything it considers the Minister should take into account that has not already been acknowledged by the Applicant in its referral application.

2.1.4 DOC has the following comments on sections 21(3) and (4), and section 22:

Section	**Criteria**	**Comments**
21(3)(b)	Does the project involve an ineligible activity	DOC has considered section 5(1) (f), (h), (i), (j) and (k). DOC has not identified any aspect of the Project that would be ineligible under these sections.
21(3)(c)	Is there adequate information to inform a decision	DOC considers the information adequate in terms of a referral decision.
21(4)	Are there any other reasons not specified	DOC has not identified any other reasons why the project should not be referred.

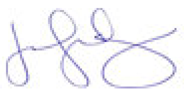
Section	Criteria	Comments
21(5)(a)	Is the project inconsistent with: • a Treaty settlement; • Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019; • Marine and Coastal Area (Takutai Moana) Act 2011.	DOC has not identified any inconsistency with any relevant settlement or other obligation. Relevant Treaty Settlement Acts are: • Ngāi Tahu Claims Settlement Act 1998.
21(5)(b)	Would it be more appropriate to deal with the proposed approvals under another Act(s)	DOC has not identified any reason why the approvals required for this Project should not be dealt with under the FTAA.
21(5)(c)	Would the project have significant adverse effects on the environment	Based on the level of information provided in the Application, it is not possible to determine the scale of effects, however, due to the scale and nature of the development proposed for the Project site, DOC considers the Project will have significant adverse effects on ecological values. However, based on: • our knowledge of the existing environment and species expected to occur on the site, • our understanding of the Project and mining methods proposed to be employed, and • our experience of the kinds of design measures and conditions that could be implemented DOC considers that, subject to appropriate conditions, it could be possible to achieve a project that does not have significant adverse effects on the environment. Consideration will need to be given to potential flooding and subsequent damage to Soldier's Road after diversion closer to Devils Creek. DOC uses this road regularly to access a newly built predator proof fence for the Threatened - Nationally Critical Alborn's skink. DOC needs to continue to be able to access the site quickly to repair any damage to the fence after weather events.
21(5)(d)	Does the applicant(s) have a poor compliance history under a specified Act	DOC has not identified any issues with the Applicant's compliance history. It is noted in the Referral Application, however, that on the 31st of May 2019, the Applicant underwent a change of control within the meaning of the Crown

Section	Criteria	Comments
		Minerals Act 1991 ('CMA'), for which the Minister's consent was not sought or obtained. This constituted a breach of the CMA because the Applicant was, and is, the permit operator for a Tier 1 exploration permit (EP 60491). The Referral Application goes on to note that on the 26th of February 2020, the Applicant received a warning letter from New Zealand Petroleum and Minerals, in relation to the breach. The warning letter confirmed the Minister did not intend to revoke the Applicant's exploration permit or prosecute the Applicant for the breach.
21(5)(g)	Would a substantive application have any competing applications	There are a number of applications associated with Victoria Forest Park, given this, there may be competing applications associated with the Project. The following is a list of pending applications associated with the Victoria Forest Park Project area. In the time available we have been unable to ascertain whether any applications relate directly to the same location within the Forest Park. Holder: Charlie Rowe Limited ID: 126061-AIR Status: Pending Primary Service: Recreation Description: Helicopter landings – scenic landings, pick up / drop off of recreationalists, hikers, hunters, fishermen Holder: Outdoor Education New Zealand Limited ID: 125928-GUI Status: Pending Primary Service: Recreation Description: Outdoor Education / Instructional Trips Holder: Sidetracks Limited ID: 117337-GUI Status: Pending Primary Service: Recreation Description: Guided day and overnight walks
22(1)(b)(i)	Would referring the project to the fast-track process facilitate the project, including in a way that is more timely and cost-	The Project requires a range of approvals that would otherwise need to be applied for under several different legislative processes (e.g. resource consents, wildlife permits, mining permits and associated access arrangements, and concessions). Given this, there may

Section	Criteria	Comments
	effective than under normal processes?	be cost and efficiency benefits for the Applicant in terms of consideration of the approvals being combined and given the different decision-making framework under the FTAA.
22(2)(a)(ix)	Will this project address significant environmental issues?	No.
22(2)(a)(x)	Is the project consistent with local or regional planning document, including spatial strategies?	The following DOC Statutory Planning documents are relevant to the Project: • Conservation General Policy 2005 (CGP); • West Coast Te Tai Poutini Conservation Management Strategy. At a high level, no inconsistency with these documents has been identified but the Project will need to consider them if it proceeds to a substantive application.
22(b)	Any other matters the Minister may consider as relevant?	Within the Application it is noted that underground geotechnical conditions are anticipated to be challenging, particularly when mining close to surface. This will need to be carefully considered, not least from a health and safety perspective.

3 Matters for the Minister to specify (s27)

3.1.1 With regard to s27(3)(b)(ii), DOC considers that information (including geotechnical and seismic information) confirming the Applicant's ability to safely undertake the underground mining operation proposed, should be provided.



Jenni Fitzgerald
Fast-Track Applications Manager
Acting pursuant to delegated authority on behalf of the Director-General of Conservation.

Date: 29th of May 2026

Note: A copy of the Instrument of Delegation may be inspected at the Director-General's office at Conservation House Whare Kaupapa Atawhai, 18/32 Manners Street, Wellington 6011

MINISTRY OF BUSINESS, INNOVATION & EMPLOYMENT
HĪKINA WHAKATUTUKI

File Ref: FTAA-2604-1206

29 May 2026

Hon Chris Bishop
Minister for Infrastructure
Via submission to the Fast-track Portal

Auld Creek project referral application – New Zealand Petroleum & Minerals comments

New Zealand Petroleum & Minerals (**NZP&M**) is the part of the Ministry of Business, Innovation and Employment responsible for the minerals permitting regime under the Crown Minerals Act 1991.

This letter is in response to the request received by NZP&M on 8 May 2026 to provide comments for the Minister for Infrastructure (the **Minister**) on the referral application made by Reefton Resources Pty Limited (the **Applicant**) for its Auld Creek Project (the **project**).

Our comments focus on matters relevant to the proposed mining permit which will form part of the Applicant's substantive application should its referral application be successful.

Overview of our comments

To assist, we briefly summarise the key themes from our comments below, with our detailed comments appended.

The project may generate significant export revenue from production of a key critical mineral

In addition to producing gold, the Applicant intends to co-produce significant quantities of antimony which has been identified as a key mineral on New Zealand's critical minerals list. The Applicant has forecast significant mineral export revenues arising from this project.

Forecasts in the referral application differ to those reported to the market

The Minister should be aware that the forecast economic returns discussed in the referral application do not align with the current classified Mineral Resource Estimate (**MRE**) and results of the Preliminary Economic Assessment (**PEA**) that the Applicant's parent company, Rua Gold Inc., has announced to the Toronto and New Zealand Stock Exchanges (**TSX** and **NZX**).

NZP&M notes there are also some material differences between the PEA results included with the referral application and as summarised and presented to the TSX and NZX on 6 May 2026. We understand, from the Applicant, that these differences have arisen through the subsequent correction of an error in the economic model.

Significant work is underway to collect information required for a substantive application should the Applicant's referral application be successful

The Applicant has advised NZP&M that it continues to work at pace to compile the necessary information to upgrade its MRE and advance details of mine planning. It expects to be able to release an updated MRE and Pre-Feasibility Study (**PFS**) by mid-September 2026. That target timeframe coincides with the Applicant's intended submission of a substantive application, if referred.

The PFS will be an important pre-requisite to support a strong mining permit application

The Applicant is working towards an ambitious timeframe to submit a substantive application. A PFS prepared in accordance with NI 43-101 (the Canadian standard for disclosure of mineral project information) will be essential for NZP&M to effectively and efficiently assist an expert panel with its consideration of the mining permit requirements.

If the Minister's decision is to accept the project for referral into the fast-track system, NZP&M recommends imposing a condition, in accordance with section 27 of the Fast-track Approvals Act 2024 (the **Act**), along the lines of the following:

> *The substantive application must be accompanied by an NI 43-101-compliant pre-feasibility study and associated economic model.*

NZP&M considers that such a condition would assist the Minister to be satisfied that the requirement of section 22(1)(b)(ii) of the Act is met – i.e. that referring the project to the fast-track approvals process is unlikely to affect the efficient operation of the fast-track approvals process.

We have not identified any eligibility criteria issues

NZP&M has not identified any matters that would make the project ineligible for acceptance into the fast-track approvals process. For completeness, we have provided some commentary on selected eligibility-related matters we have turned our mind to.

Ongoing engagement

NZP&M will continue to engage constructively with the Applicant on matters relating to the proposed mining permit application.

Should you wish to clarify any aspect of NZP&M's comments, we would be happy to discuss or provide further information.

Nāku noa, nā

John Buick-Constable
National Manager, Petroleum, Minerals and Offshore Renewable Energy
Resource Markets

NZP&M comments on the referral application by Reefton Resources Pty Limited for the Auld Creek Project (FTAA-2604-1206)

The Auld Creek Project may see significant economic activity driven by the production of critical minerals

1) This project will result in the extraction of gold and antimony. Both minerals appear on New Zealand's Critical Minerals List.[1] Antimony was identified as having the 10th highest supply risk score of all critical minerals when the list was being developed.[2] There is currently no mining of antimony occurring in New Zealand.

2) The Applicant estimates that about 9,000 tonnes of antimony would be produced over an initial 8-year mine life. For context, the total historic production of antimony ore in New Zealand is about 3,900 tonnes from intermittent mining between 1874 and 1907.

3) From its forecasts, the Applicant estimates export revenues from gold and antimony will average NZ$284 million per annum over the current projected mine life.

4) In this regard, the project aligns well with aspects of the Fast-track Approvals Act (the **Act**)[3] and the New Zealand Minerals Strategy. [4]

5) NZP&M's comments below are for completeness and do not detract from the overall merits of the project. The comments reflect caution about the current economic case, given the early stage of the project and the fact that the supporting information is still developing. NZP&M recognises that the information base is evolving rapidly and that the economic case may improve as further drilling, resource updates and technical studies are completed ahead of any substantive application.

Context for the current level of Mineral Resource Estimate and technical study for the Auld Creek Project

6) The Applicant's parent company, Rua Gold Inc. (**Rua Gold**), is listed on the Toronto Stock Exchange (TSX: RUA) and New Zealand Stock Exchange (NZX: RGI).

7) As a dual-listed company, Rua Gold must ensure its public statements around exploration results, mineral resources and reserves and technical studies, including commentary on forecast production and revenue, are reported in accordance with the Canadian National Instrument on the Standards of Disclosure for Mineral Projects, **NI 43-101**.

8) In early March 2026, Rua Gold reported a Mineral Resource Estimate (**MRE**) in accordance with NI 43-101 for its Reefton-based exploration projects, including for the Auld Creek Project.

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[1] A Critical Minerals List for New Zealand

[2] Final Wood Mackenzie Report on the Development of a Critical Minerals List for New Zealand

[3] For example, in accordance with section 22(2)(vi) of the Act, the project "will support the development of natural resources, including minerals and petroleum".

[4] For example, the project would contribute towards:
- the stated goal of doubling the value of New Zealand's mineral exports to $3 billion by 2035, and
- the stated objective to "support strategically important critical mineral developments, facilities and capabilities".

9) The MRE for the Auld Creek deposit reported a total contained resource of 110,000 ounces (oz.) of gold and 13,000 tonnes of antimony. Approximately 70% of the resource is classified as lower-confidence Inferred Resource,[5] with the remainder classified as the higher-confidence Indicated Resource [6] (see Table 1, below). For ease of reporting, the combined gold-antimony resource is sometimes discussed or reported in terms of gold-equivalent grades and quantities as shown in the final two columns.

Table 1: Mineral Resource Estimate for the Auld Creek deposit, with an effective date of 27 February 2026.

Domain	Classification	Tonnes (Mt)	Au (g/t)	Contained Au Ounces (koz)	Sb (%)	Contained Sb (kt)	AuEq (g/t)	Contained AuEq (koz)
Bonanza	Indicated	0.04	2.26	3	1.6	1	5.6	6
	Inferred	0.18	1.8	11	0.8	1	3.6	21
Fraternal	Indicated	0.26	3.30	28	1.1	3	5.7	48
	Inferred	1.07	2.0	69	0.8	9	3.7	128
Total	**Indicated**	**0.30**	**3.18**	**31**	**1.2**	**3**	**5.7**	**54**
	Inferred	**1.25**	**2.0**	**79**	**0.8**	**10**	**3.7**	**149**

Notes:

1. *The definitions for Mineral Resources of the Canadian Institute of Mining, Metallurgy, and Petroleum were followed.*
2. *The Mineral Resource is reported at a cut-off of 1.7 g/t AuEq.*
3. *Metal-equivalent grades were calculated using the following prices: USD 3,000/oz Au, and USD 25,000/t Sb and calculated using the formula AuEq = Au g/t + 2.15 × Sb%.*
4. *The Mineral Resource was assessed for reasonable prospects of eventual economic extraction by re-blocking to a regular 2.5 mW × 5 mH × 5 mL minimum block dimension, converting to wireframe solids, and generating minimum mining units, commensurate with the anticipated smallest mining-unit dimensions for a long-hole stoping operation.*
5. *Totals may vary due to rounding.*

10) The Auld Creek Project is currently studied to the level of a “Preliminary Economic Assessment” (**PEA**). This is an early-stage technical study that looks at the potential viability of a mining project, including initial capital costs, operating costs, and revenue projections, with an accuracy range of ±30-50%. The PEA and accompanying economic model were provided with the referral application.[7]

11) On 6 May 2026, Rua Gold announced the summarised findings of the PEA to the TSX and NZX and advised it would be releasing a full NI 43-101 Technical Report in the coming weeks, as is required under listing rules.

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[5] An Inferred Minerals Resource is that part of a Mineral Resource for which quantity and grade or quality are estimated on the basis of limited geological evidence and sampling. Geological evidence is sufficient to imply but not verify geological and grade or quality continuity. An Inferred Mineral Resource has a lower level of confidence than that applying to an Indicated Mineral Resource and must not be converted to a Mineral Reserve. It is reasonably expected that the majority of Inferred Mineral Resources could be upgraded to Indicated Mineral Resources with continued exploration.

[6] An Indicated Mineral Resource is that part of a Mineral Resource for which quantity, grade or quality, densities, shape and physical characteristics are estimated with sufficient confidence to allow the application of Modifying Factors in sufficient detail to support mine planning and evaluation of the economic viability of the deposit. Geological evidence is derived from adequately detailed and reliable exploration, sampling and testing and is sufficient to assume geological and grade or quality continuity between points of observation.

[7] The PEA provided is noted to be accurate to within ± 50%.

12) Work is underway to complete a more advanced mining study, a Pre-Feasibility Study (**PFS**), to test the technical and economic viability of the project using more detailed and project-specific data compared to the PEA.

The projected economic returns discussed in the referral application are different to those supported by the current classified resource and the PEA

13) The Minister should be aware that the economic projections included in the application are not based on the current classified MRE or results of the PEA.

14) Rather, the economic analysis, which is discussed on page 26 of the referral application, and detailed in Attachment 12:
    a) extrapolates revenue from a significantly larger (though unspecified) gold resource compared to the current NI 43-101 resource estimate, and
    b) appears to be informed by different capital and operating costs than the current PEA.[8]

15) For example, the referral application advises the average annual export revenues across the 8-year mine life would be NZ$217 million for gold, based on a gold price of US$4,116/oz, and NZ$67 million for antimony, based on a price of US$27,250/tonne (using NZD:USD 0.58). Across the 8-year mine life, the Applicant's economic assessment estimates total export revenue would be NZ$2,269 million with a net present value of NZ$1,636 million (discounted at 8%).

16) The above figures appear to indicate total sales of approximately 244,000 oz. of gold and 11,400 tonnes of antimony.

17) Therefore, the projected export revenue discussed at page 26 in the referral application appears to assume future extraction and sale of a gold resource that is about 2.2 times larger than the total classified resource reported to the market (currently 110,000 oz.), and about 2.9 times more gold than what the current PEA estimates would be recovered (currently 84,482 oz.).

18) The key point is that the Applicant considers it can forecast future resource production and revenues from its existing internal datasets that exceed the current MRE and PEA findings. However, the Applicant is not yet able to report those projections in a compliant manner to the market.

There are differences between the PEA included with the application and announced to the market

19) For completeness, we note that there are some material differences between the key project economic indicators in the application version of the PEA provided and the summary of the PEA as announced to the TSX and NZX on 6 May 2026.

20) A summary of those key differences identified by NZP&M is set out in Table 2, below.

[8] See "key assumptions" listed at page 11 of Attachment 12 to the Referral Application.

Table 2: Differences between key PEA findings as presented in the economic model accompanying the application and as summarised to the TSX and NZX on 06 May 2026. [Both presented for the base case of gold US$3,330/oz and antimony US$27,000/tonne]

Project metric	Accompanying application	TSX/NZX Summary
Project NPV	US$74.4M	US$42.0M
Discount rate used for NPV	7%	5%
IRR (%)	28.3%	17%
Gold produced (oz)	93,327	84,482
Antimony produced (tonnes)	11,111	8,995
All-In-Sustaining-Cost	US$1,836/oz	US$1,850/oz

21) The summarised results announced to the markets report a lower project NPV (even with the use of a lower discount rate), a lower IRR, lower production of gold and antimony, and an increased All-In-Sustaining-Cost.

22) Having raised these observations with Rua Gold, we understand these differences reflect a correction that was applied to the economic model following the lodgement of the referral application but prior to the public announcements.

Additional observations about the PEA economic model

23) For completeness, we note these additional observations about the PEA economic model:

a) The base case gold price used, US$3,300/oz, is considered by NZP&M to be on the high side. [9] The project is highly sensitive to commodity prices, and this assumption may not represent a realistic base case.

b) Corporate tax is modelled at 25% rather than 28%. Correcting this will reduce returns and delay project payback.

c) The discount rates applied (7% in the application and 5% in the public summary announcement) are considered by NZP&M to be too low for the current level of project uncertainty and risk. A lower discount rate increases returns, especially in later periods, and results in a higher estimated NPV.

24) These are matters that NZP&M will raise separately with the Applicant in our ongoing engagement.

The information base is growing rapidly, and the project information is expected to improve

25) NZP&M notes that the Applicant has been progressing exploration, appraisal and mining studies at pace. As signalled in the referral application, [10] Rua Gold is working towards completing a Pre-Feasibility Study (**PFS**) in September 2026. If referred, that PFS will form a

[9] The Referral application describes production of doré (a semi-refined gold-silver product) and an antimony concentrate, whereas the PEA refers to production of a gold concentrate and an antimony concentrate. Gold concentrate product is expected achieve a lower sale price compared to doré, which may affect revenue assumptions.

[10] Referral application, page 97

key part of the supporting information accompanying the substantive application, which is also intended to be lodged in September 2026.

26) Rua Gold advises a further 19,000m of drilling is underway at the Auld Creek prospect. A key focus of the drilling programme is to upgrade and improve the confidence in the resource estimate, and particularly to convert significant portions of the resource from Inferred to Indicated classification.

27) s 9(2)(k) [redacted]

The Applicant is working towards an ambitious timeframe

28) The Applicant's targeted September 2026 timeframe for lodging a substantive application (if referred) is very ambitious, but not impossible. There is a considerable amount of exploration, appraisal work, modelling and technical study still required to support a strong Tier 1 mining permit application.

29) From the perspective of readiness to lodge a mining permit application, the completion of an NI 43-101-compliant PFS, and the associated project economic model, will be a very important milestone.

30) ***There is a risk that, if the PFS is not completed by September 2026, the Applicant may nevertheless lodge the substantive application and seek to complete the PFS during the early stages of the fast-track process.*** Given the importance of the PFS to supporting the mining permit application, NZP&M considers this would compromise NZP&M's ability to effectively and efficiently support the work of the panel convenor and expert panel.

31) This is relevant because section 22(1)(b)(ii) of the Act requires that the acceptance of a project is *unlikely to materially impact the efficient operation of the fast-track approvals process*.

32) NZP&M considers the above risk could be effectively managed by the Minister specifying, in accordance with section 27(3)(b) of the Act, that the substantive application must be accompanied by an NI 43-101-compliant pre-feasibility study and associated economic model.

Eligibility of the project

33) Our comments with respect to eligibility focus on the mining permit application aspects of the fast-track process.

34) The Applicant holds two current exploration permits under the Crown Minerals Act 1991 (**CMA**) that are relevant to the referral application:

a) Exploration Permit (EP) 60648, issued for all metallic minerals (excluding uranium) and all non-metallic minerals, and

b) EP 60747, issued for gold and silver.

35) If referred, the Applicant intends to apply for a single mining permit that would cover part of each exploration permit as illustrated in Figure 8 of the referral application.

36) While we have not identified any matters that we consider would make this project ineligible, there are three eligibility-related matters that are worth expanding on. These relate to:

   a) the mineral rights held by the Applicant under its exploration permits
   b) the expiry dates of those exploration permits, and
   c) areas of private mineral ownership.

37) None of those points appear to be directly relevant to the Minister's consideration of a referral application. However, we raise them here as they are matters that could directly impact the ability of an applicant to apply for a mining permit as part of a substantive application[11].

Mineral rights for EP 60747 and expiry of EP 60648

38) The referral application notes[12] that, at the time of applying, there were two active applications involving those permits that were under evaluation by NZP&M. Those applications were:

   a) 60747.05 – which sought to extend the existing mineral rights under this permit to include all other metallic minerals (excluding uranium). It is through this application that the Applicant was seeking to secure rights in relation to antimony on EP 60747, which would be needed for its proposed mining permit application.
   b) 60648.05 – which sought to extend the duration of the exploration permit by a further five years from 18 March 2026, which was the listed expiry date of that permit at the time of lodging the referral application.[13]

39) NZP&M confirms that both CMA applications have since been granted. Accordingly:

   a) EP 60747 now grants Reefton Resources Pty Limited exploration rights in relation to all metallic minerals (excluding uranium), and
   b) the expiry date of EP 60648 is now 18 March 2031.

Private mineral ownership

40) By virtue of section 10 of the CMA, all gold, silver, petroleum and uranium in their natural condition in land are always owned by the Crown. These are sometimes referred to as the 'statute minerals'.

41) 'Non-statute' minerals refer to all other minerals. Non-statute minerals can be owned by the Crown or privately. The Applicant's proposed mining permit would include both a statute mineral (gold) and a non-statute mineral (antimony).

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[11] Specifically, section 42(11)(b) of the Act provides that a mining permit application could only be made if the applicant holds exploration permits that apply to the relevant minerals, and the exploration permits have at least 3 months remaining before they expire.

[12] Section 3.7.2 of the Referral application.

[13] Although this initial listed expiry date had passed at the time the Referral application was submitted, the extension of duration application prevented the permit from expiring until a decision was made on that application in accordance with section 36(5A) of the CMA.

42) Mineral ownership information was provided with the application (Attachment 23). In some pockets of land within the proposed mining permit, antimony is privately owned.

43) We note that the areas of privately-owned antimony do not correspond to the Applicant's currently delineated gold-antimony resource or the areas presently identified for mining of antimony (see Figure 1). In the event the Applicant were to later delineate an antimony resource in land where the mineral is privately owned, the Applicant would need the permission of the mineral owner to mine that antimony resource.

44) We also note that those areas of private minerals do not preclude a mining permit being granted over the proposed mining permit area. If a mining permit were to be granted, the permit certificate would simply specify the land parcels for which non-statute minerals are privately-owned (and therefore not subject to the permit). This is standard practice.

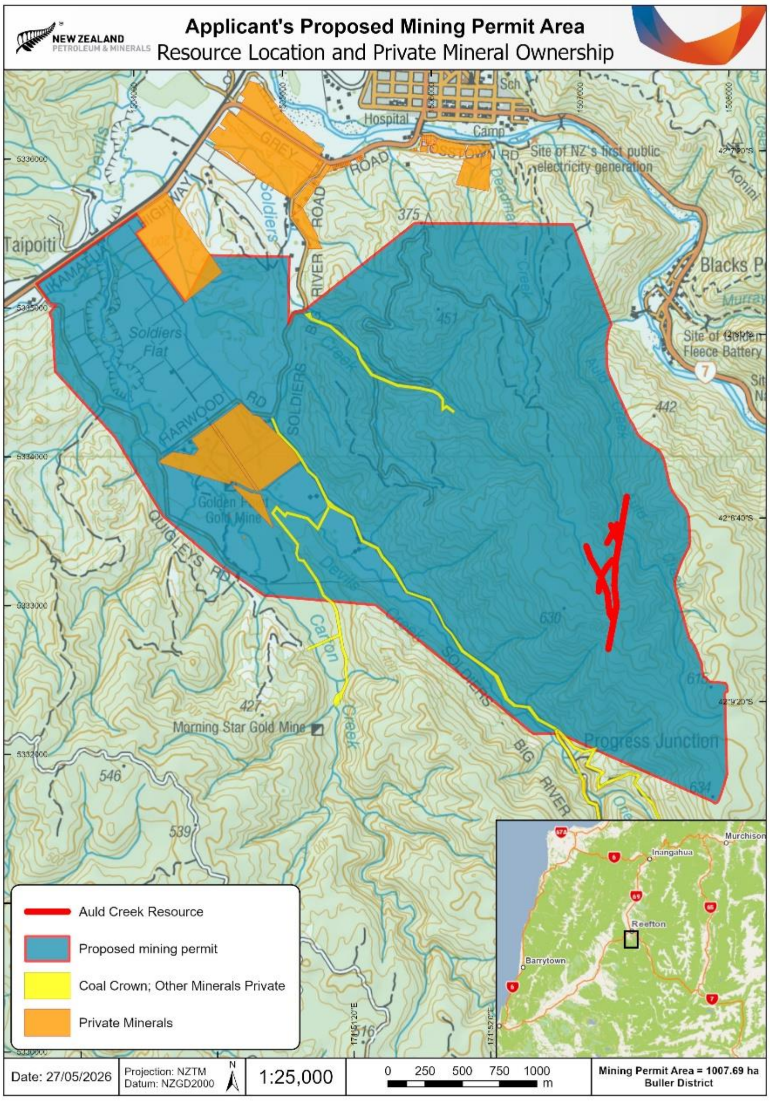

Figure 1: Private mineral ownership and approximate location of the current delineated resource within the proposed mining permit.

Additional matters

45) In accordance with section 13(4)(x) of the Act, the Applicant provided a summary in its application of a CMA-related compliance matter that was resolved in February 2020 (refer

to section 3.7.1 of the referral application for details). NZP&M agrees with the summary provided and confirms that no material compliance or enforcement matters have arisen since that time.

46) NZP&M intends to engage constructively with the Applicant to identify gaps and address any issues ahead of a mining permit application being made – whether that is through a substantive application under the Act, or through the regular process under the CMA.

Invitation to provide written comments on a project under the Fast Track Approvals Act 2024

You have been invited to provide written comments to the Minister for Infrastructure (the Minister) on an application to refer a project under the Fast-track Approvals Act 2024 (the Act) to the fast-track process.

Please upload comments directly via the portal by completing this template.

Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

Written comments must be received by MfE, on behalf of the Minister for Infrastructure, no later than the due date.

Important information

Your personal information will be held by MfE and be used in relation to the project application and process. You have the right to access and correct personal information held by MfE.

A copy of your comments, including all personal information, will be provided to the Minister and the applicant.

If you are a corporate entity making comments on this application, your full contact details will be publicly available.

For individuals, your name will be publicly available, but your contact details (phone number, address, and email) will not be publicly available.

A copy of your comments will also be published on the Fast-track website. If you believe any of the information you have provided is confidential or sensitive and should be withheld from publication, please highlight the information concerned and provide an explanation to support your request for withholding it. Your comment and explanation will be decided by the Ministry on whether to withhold the information from publication.

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All information held by MfE is subject to the Official Information Act 1982.

More information on the fast-track approvals process and providing comments can be found at Process overview | Fast-track website

Your written comments on a project under the Fast Track Approvals Act 2024

Project name	Auld Creek Project

Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

All sections of this form with an asterisk (*) must be completed.

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	New Zealand Petroleum & Minerals (part of the Ministry of Business, Innovation and Employment)		
***First name**	John		
***Last name**	Buick-Constable		
Postal address			
***Contact phone number**	s 9(2)(a)	**Alternative**	
***Email**	s 9(2)(a)		

2. Please provide your comments on this application
If you need more space, please attach additional pages. Please include your name, page numbers and the project name on the additional pages.

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

Managers signoff

John Buick-Constable

National Manager, Petroleum, Minerals & Offshore Renewable Energy

29 May 2026

New Zealand
MINERALS
COUNCIL

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.

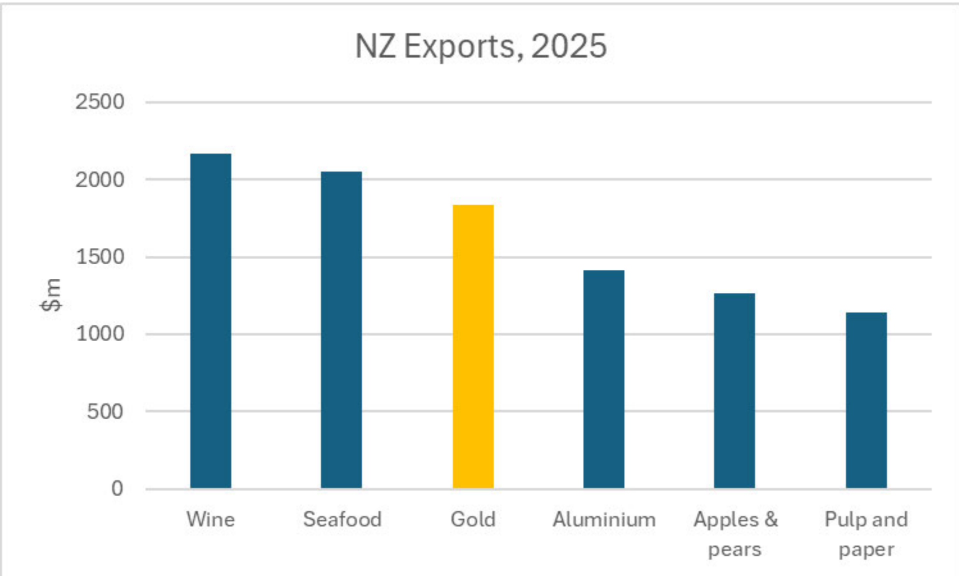
11. The strategy projects an export-led growth pathway for mining towards a goal of doubling annual mineral exports to $3 billion by 2035. Doubling exports will likely come from a combination of the high value of minerals mined and new production, such as the Auld Creek Project.
12. Given the interest 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.

Invitation to provide written comments on a project under the Fast Track Approvals Act 2024

You have been invited to provide written comments to the Minister for Infrastructure (the Minister) on an application to refer under the Fast-track Approvals Act 2024 (the Act) to the fast-track process.

Please upload comments directly via the portal by completing this template.

Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

Written comments must be received by MfE, on behalf of the Minister for Infrastructure, no later than the due date.

Important information

Your personal information will be held by MfE and be used in relation to the project application and process. You have the right to access and correct personal information held by MfE.

A copy of your comments, including all personal information, will be provided to the Minister and the applicant.

If you are a corporate entity making comments on this application, your full contact details will be publicly available.

For individuals, your name will be publicly available, but your contact details (phone number, address, and email) will not be publicly available.

A copy of your comments will also be published on the Fast-track website. If you believe any of the information you have provided is confidential or sensitive and should be withheld from publication, please highlight the information concerned and provide an explanation to support your request for withholding it. Your comment and explanation will be decided by the Ministry on whether to withhold the information from publication.

Please do not use copyright material without the permission of the copyright holder.

All information held by MfE is subject to the Official Information Act 1982.

More information on the fast-track approvals process and providing comments can be found at Process overview | Fast-track website

Your written comments on a project under the Fast Track Approvals Act 2024

Project name	Auld Creek

Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

All sections of this form with an asterisk (*) must be completed.

1. Contact Details

Please ensure that you have authority to comment on the application on behalf of those named on this form.

Organisation name (if relevant)	NZ Transport Agency		
***First name**	Nicola		
***Last name**	Foran		
Postal address			
***Contact phone number**	s 9(2)(a)	**Alternative**	
***Email**	environmentalplanning@nzta.govt.nz		

2. Please provide your comments on this application

NZTA thanks the Minister for the opportunity to comment on the referral of this application into the Fast-track approvals process.

NZTA would need to see the substantive application to be able to determine actual impacts on the state highway network, however developments of this nature usually impact the network through increased heavy vehicle movements during site development and construction, and a sustained increase in traffic volumes at the completion of the development.

As part of the substantive application, NZTA would expect to see an Integrated Transport Assessment, including a sightline analysis of the Quigleys Road/State Highway 7 intersection, prepared. The intersection of Quigleys Road and State Highway 7 will need to be upgraded in accordance with the Planning Policy Manual 2025.

Therefore, based on the information provided, NZTA has no concerns with this project, Auld Creek, being referred into the Fast-track approvals process. NZTA would welcome the opportunity to provide comments on any substantive application in due course

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

Managers signoff

Insert Fast-track logo

Nicola Foran

Date 18 May 2026

s 9(2)(a)

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Kia ora

Thank you for inviting comment from Ngati Mahaki (Te Runanga o Makaawhio), in accordance with our Mana Whakahono a Rohe.

This is to confirm that Ngati Mahaki are supportive of fast-tracking this mining project. The economic benefit is of immeasurable benefit to Te Tai Poutini (West Coast), and we are satisfied that this will be achieved in a manner that respects the environment and will actually have a minimal footprint on the landscape. If you need anything further please don't hesitate to reach out.

Heoi ano

Paul Madgwick
Chairman
Te Runanga o Makaawhio
Ngati Mahaki, Poutini Ngai Tahu
s 9(2)(a)