

IN THE MATTER
AND

of the Fast-track Approvals Act 2024 (the Act)

IN THE MATTER

of an Application made under the Fast-Track
Approvals Act 2024 by Matakanui Gold
Limited (Santana Minerals)

STATEMENT OF EVIDENCE OF MARK HUGH PIZEY (MINE ENGINEERING AND
ENVIRONMENTAL MANAGEMENT) ON BEHALF OF KĀTI HUIRAPA RŪNAKA KI
PUKETERAKI, TE RŪNANGA O MOERAKI, TE RŪNAKA O ŌTĀKOU, AND
HOKONUI RŪNANGA (KĀ RŪNAKA)

7 SEPTEMBER 2026



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INTRODUCTION

1. I have reviewed the materials provided in response to RFI-11 in respect of mining and environmental issues related to proposed bonds, and also the updated conditions provided by Matakanui Gold Limited (**MGL**) on 28 August 2026.

Late provision of crucially important information

2. The potential for serious levels of concerning ground water contamination is inherent in the proposal and that a key to understanding the potential impact was a clear understanding of the shallow and deep water aquifer behaviour.
3. Whilst there were reasonable assumptions made in relation to the aquifer characteristics in earlier information (the schist bedrock would have lower permeability whilst the shallow weathered schist and alluvium/colluvium would be relatively permeable), the quantitative data available as a result of this recent work, would have provided assurance of the behaviours and potential impact. As it is, the initial assumptions have been borne out and a more rigorous design undertaken.
4. Given the scale of the proposed project and the potential environmental impact on ground water and its downstream users, it would be reasonable to expect this risk would have been more thoroughly assessed at an earlier time.
5. This work should not have been left until a question from the Panel prompted it.

Bond

6. The concept that underlies the bond is that this should not be relinquished until the closure / rehabilitation goals have been achieved.
7. In a simple situation, for example the development, operation and closure of an alluvial gold mining operation, hard and fast standards for the achievement of rehabilitation, such as a stock carrying capacity for re-established pasture can be prescribed and measured and the Regulator may relinquish the bond with confidence.

8. In a more complex situation where multiple criteria need to be met to satisfy closure, the bond may be relinquished in part, as each criteria is reached. To enable this to occur, multiple bonds may be established, each with their own closure criteria.
9. In a situation like MGL, with liabilities that are partially "in perpetuity", the bond concept is less well suited to deal with matters that are not clearly defined in scope and duration.
10. To be confident the proposed sum for the bond is sufficient, additional detailed work with full scrutiny of the financial provisions is essential.

Matakanui Trust

11. The creation of a trust entity that is separated from a local government is a preferred mechanism for the long-term management of ecological and other environmental impacts or risks associated with the large scale mining development proposed by MGL.
12. The last thing that should happen is that the community should shoulder responsibility and the financial liability for the long-term remedial work of a mining company.
13. Obviously, the quantum of the fund vested in the trust entity is absolutely critical. The logic behind any proposed figure needs to be vigorously interrogated and subject to some sort of risk assessment process to provide reassurance to potential or actual trustees and the Regulators, that adequate provision has been made.

Conditions

14. Conditions should be, as much as possible, a binary type of question where compliance can be quantitatively determined rather than through subjective assessments. The use of Management Plans as a measure of compliance removes this essential objectivity from this equation as it passes the responsibility and the degree of compliance back to the Applicant. The preparation of a management plan does not in itself ensure compliance; at best it means the Applicant has considered the issues and proposed

measures to address them if/when they occur; at worst it is a tick box exercise by the Regulator and does not secure any action in the field.

15. The problem in complex situations, such as this, is that the inclusion of detailed methodology as a Condition of consent would become so cumbersome as to be potentially unmanageable and in technically complex situations, probably beyond the capacity of the Regulator to use as a measure of compliance (or understand).
16. The specific risks that remain, without the prior creation of an appropriate vehicle to manage the site as a whole once the Applicant completes the necessary post mining work and the bond(s) are relinquished, relate to the ongoing requirements for water treatment (including ongoing monitoring system, any consumable other operating costs and periodic replacement of the passive system), overall site monitoring, management of the offsetting activities (including the maintenance and periodic replacement of predator proof fences), pest control activities and long term site stability and public safety.
17. From my review of conditions and the amended information, I can see nothing which addresses the long-term management requirements of the tailing management system as a whole. There has to be something that is in place at any early stage of the project that will give the confidence that once everyone has walked away, there is some mechanism to ensure the system's management is ongoing and is sufficiently funded. As the Application stands now, I have seen nothing that gives me the confidence that the long term management of tailings and their associated impacts is truly provided for.

Mark Hugh Pizey

7 September 2026