



REEFTON RESOURCES PTY LIMITED

AULD CREEK PROJECT

Fast-track Approvals Referral
Application

17 April 2026

EXECUTIVE SUMMARY

Reefton Resources Pty Limited (hereby referred to as “**Rua Gold**”) is seeking referral of the Auld Creek Project (the “**Project**”) under the Fast Track Approvals Act 2024 and the Fast-Track Approvals Amendments Act 2025 (“**FTAA**” or “the **Act**”). The FTAA holds the purpose to fast-track development with significant regional and national benefits. This Project is consistent with this purpose as it enables access to New Zealand’s largest known antimony deposit (as well as gold), strengthening resilience for a critical mineral in an increasingly constrained global market.

The Auld Creek Project is an underground mining operation with the key objective to develop the Auld Creek gold and antimony deposit located 3 km south of Reefton in the West Coast Region of New Zealand. The Project proposes to use modern underground narrow-vein mining techniques and includes the on-site processing of gold and antimony concentrates, ensuring processing benefits are retained in New Zealand.

Independent economic analysis indicates the Project will average exports of about \$217 M per year (gold) and \$67 M per year (antimony) over the eight years of production. This totals \$2.269 B in export revenue and \$1.636 B net present value (NPV). The total GDP contribution is expected at \$403 M per year across the production period. Over the full Project life, GDP contribution is expected at \$3.627 B with a NPV of \$2.462 B.

The regional payoff is significant with both economic and employment benefits, including a total \$46 M per year expected to the Buller District GDP and a further \$29 M GDP contribution to the wider West Coast Region. The Project will generate 200 long-term jobs rising to 267 at peak production, and 771 total roles supported locally (both directly and indirectly) during peak production. These positions will include higher-skill and higher-wage underground mining jobs, offering increased career opportunities.

The Auld Creek project is directly aligned with the Government’s Mineral Strategy 2040. The Project directly supports the development of critical minerals (both gold and antimony) with the Auld Creek deposit being specifically identified in the Mineral Strategy as the country’s most significant antimony deposit. Antimony is increasingly acknowledged for its role in defence and advanced manufacturing, highlighting the potential benefits of enhancing local production to ensure supply chain stability. Consequently, advancing the antimony resource in New Zealand can contribute positively to the country's economic resilience.

Rua Gold has actively engaged technical experts and conducted comprehensive consultations with local iwi, councils, and the Department of Conservation from the Project's early stages. This early engagement with relevant stakeholders and experts has shaped the Project to minimise its surface footprint, thereby reducing adverse effects from

the start and aligning with local and regional strategic objectives. A suite of technical assessments accompanies the following application; these assessments acknowledge the expected and known adverse effects on the environment and conclude these effects are well understood and can be managed through standard, proven controls (consistent with comparable underground operations in the West Coast region). This consultation and engagement will continue throughout the Project's development.

Rua Gold is finalising a suite of Preliminary Economic Assessment ("**PEA**") level documents which cover mining and processing, a draft version of the mining PEA report is provided with this application. The finalised PEA document will be provided to Government and released to market in early May 2026. Rua Gold is currently undertaking 19,000 m of drilling to inform resource modelling and a Pre-Feasibility Study ("**PFS**") level study which will be provided to the Government with a substantive application.

The FTAA provides a streamlined approvals pathway for the Auld Creek Project. Given the 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) before different regulators; the fast-track process will enable a significantly faster and more cost-effective outcome than standard consenting pathways.

Without referral of this Project \$2.3 B in exports will not be realised and 200 high-value jobs will not be created. It is clear the Auld Creek Project will provide strong economic and strategic benefits at both the regional and national level directly aligning with the purpose of the Act and therefore should be accepted for referral.

TABLE OF CONTENTS

1.	Applicant	1
1.1	Applicant Details	1
1.2	Agent Acting on Behalf of the Applicant	1
1.3	Correspondence	2
2.	Referral Application Summary	3
2.1	Project Name	3
2.2	Project Description and Location	3
2.3	Ineligible Activities	24
2.4	Exemptions from Requirements to Provide Agreement	25
2.5	Ministerial Approval	25
2.6	Appropriateness for Fast-track Approval Process	25
3.	Project Details	42
3.1	Approvals Required	42
3.2	Staging of the Project	55
3.3	Alternate Project	55
3.4	Adverse Effects	55
3.5	Persons Affected	71
3.6	Legal Interests	79
3.7	Other Matters	79
3.8	Specific Proposed Approvals	82

LIST OF FIGURES

Figure 1:	Auld Creek project Location	4
Figure 2:	Auld Creek Project Site Layout	7
Figure 3:	Existing Exploration Permit Areas (green) relative to the Project Site (star)	8
Figure 4:	Auld Creek Gold-Antimony Deposit	10
Figure 5:	Cross section of Auld Creek Deposit Looking North	11
Figure 6:	Proposed Underground Mine Layout (Facing East)	14
Figure 7:	Auld Creek Surface Infrastructure Components	15
Figure 8:	Proposed Auld Creek Project Mining Permit Area	23
Figure 9:	High level design of processing plant	99
Figure 10:	Process flow sheet developed by Pitch Black for the Auld Creek Project	100

LIST OF TABLES

Table 1: Existing Mining related Approvals Relevant to the Project Area

8

LIST OF ATTACHMENTS

Attachment 1:	Authorisation Letter
Attachment 2:	Indicative Site Layout Graphic
Attachment 3:	Existing Exploration Permits
Attachment 4:	Existing Access Arrangements
Attachment 5:	NI 43-101 Technical Report
Attachment 6:	Underground Preliminary Economic Assessment
Attachment 7:	Site Access Option Assessment
Attachment 8:	Map of Existing Roads and Access Tracks
Attachment 9:	Records of Titles
Attachment 10:	Mining Permit Area Maps
Attachment 11:	Antimony Fact Sheet
Attachment 12:	Economic Evidence
Attachment 13:	Consolidated Letters of Support
Attachment 14:	Landscape Assessment
Attachment 15:	Acoustics and Air Quality Assessment
Attachment 16:	Safety-Critical Roles and Ground Pre-Conditioning Memorandum
Attachment 17:	Green Road Mining Assessments Summary
Attachment 18:	Ecological Technical Memorandum
Attachment 19:	Archaeological Features Map



- Attachment 20: Consolidated Notification of Intent to Lodge Referral Application Letters
- Attachment 21: Notice of Request for Grant of Right of Access
- Attachment 22: Auld Creek Economic Model
- Attachment 23: Land and Mineral Status Reports



REPORT INFORMATION

Report Status	Final
Version Number	1
Version Date	17 April 2026

© Mitchell Daysh Limited (2026).

This report has been prepared by Mitchell Daysh Ltd on the specific instructions of our Client. It is solely for our Client’s use for the purpose for which it is intended in accordance with the agreed scope of work. Any use or reliance by a third party is at that person’s own risk. No liability or responsibility is accepted by Mitchell Daysh Ltd for any errors or omissions to the extent that they arise from inaccurate information provided by the Client or any external source.



1. APPLICANT

1.1 APPLICANT DETAILS

Person or entity making the request: Reefton Resources Pty Limited

Reefton Resources Pty Limited (hereby referred to as “**Rua Gold**”) holds exploration tenements across the Reefton Goldfield on the West Coast of the South Island, New Zealand. Rua Gold controls the Reefton Gold District as the dominant landholder with over 120,000 ha (95%) of tenements.

Rua Gold is an emerging gold exploration company headquartered in Vancouver, Canada, strategically focused on advancing projects in New Zealand’s historic Reefton and Hauraki Goldfields, which together have produced more than 17 million ounces of gold. Rua Gold’s Glamorgan Project in the Hauraki district solidifies the company’s position as a leading high-grade gold explorer. With over 150 years of combined experience in gold mining, Rua Gold have successfully taken major discoveries into producing world-class mines across multiple continents.

Organisation: Reefton Resources Pty Limited

Contact Person: Simon Delander

Job Title: Vice President

Phone: s 9(2)(a)

Email: s 9(2)(a)

Postal Address: 1 Hattie Street, Reefton 7830.

1.2 AGENT ACTING ON BEHALF OF THE APPLICANT

Organisation: Mitchell Daysh Limited

Contact Person: Claire Hunter

Job Title: Director

Phone: s 9(2)(a)

Email: s 9(2)(a)

Postal Address: PO Box 489, Dunedin, 9054

Evidence confirming the authorisation for Michell Daysh Limited to submit this application on behalf of the applicant (Rua Gold) is included as **Attachment 1**.

1.3 CORRESPONDENCE

Please direct all correspondence relating to this application (including correspondence from MfE) to:

Organisation: Reefton Resources Pty Limited

Contact Person: Leanne Houghton

Job Title: Consent Project Coordinator

Phone: s 9(2)(a)

Email: s 9(2)(a)

Postal Address: 1 Hattie Street, Reefton 7830.

2. REFERRAL APPLICATION SUMMARY

2.1 PROJECT NAME

Auld Creek Project

2.2 PROJECT DESCRIPTION AND LOCATION

2.2.1 Project Description

2.2.1.1 Summary

Rua Gold is seeking to use the fast-track approval process for the Auld Creek Project (“the **Project**”) by lodging a referral application under the Fast Track Approvals Act 2024 and the Fast-Track Approvals Amendments Act 2025 (“the **Act**” or “**FTAA**”). The following document provides the required information for a referral application under sections 13 and 11 of the FTAA, respectively. This referral application is prepared in respect of the Auld Creek Project, as a proposed mining development, and seeks a suite of approvals under the Act, including:

- > A mining permit under the Crown Minerals Act 1991;
- > Access arrangements over conservation land under the Crown Minerals Act 1991;
- > A suite of resource consents under the Resource Management Act 1991;
- > Concessions by way of easements over conservation land under the Conservation Act 1983;
- > Wildlife Authorisations under the Wildlife Act 1953; and
- > Dispensations under the Freshwater Fisheries Regulations 1983.

The Project is a development with significant regional and national benefits. Referring the project to the fast-track approvals process would facilitate the project through timely, cost efficient and coordinated decision-making across the suite of approvals set out above.

Referring the project into the fast-track is unlikely to materially affect the operation of the fast-track approvals process and therefore, should be accepted for referral to the fast-track approval process. The Auld Creek Project (the “**Project**”) is a proposed mining development with the objective to bring New Zealand’s largest known gold-antimony resource into production. Rua Gold is seeking authorisations for the integrated development of the Auld Creek deposit, together with associated infrastructure and mining activities. The Auld Creek deposit is located beneath Victoria Forest Park, approximately 3 km south of Reefton (see Figure 1 below).



Figure 1: Auld Creek project Location



Rua Gold has invested more than \$40 million in the exploration of the Reefton Goldfields over the past 6 years; the geologists have identified a number of targets using soil sampling, surveys, magnetic surveys, and drilling. In recent years, Rua Gold has narrowed its focus to the Auld Creek prospect as an economic resource that could transition into a mining phase.

The Auld Creek deposit includes gold and antimony mineralisation, with stibnite as the primary antimony mineral. The project is targeted to have a resource of approximately 300,000 ounces of gold with antimony at 1%, the ore will be extracted using safe modern methods and then be transported overland to a purpose-built processing facility in the valley on private and Ngāi Tahu Forestry owned land at the end of the Soldiers Big-River Road.

The mining operation is proposed in two phases. Phase one includes the development of a portal and adit (straight line mine drive) on Crown land administered by the Department of Conservation (“**DOC**”) to access and mine the top of the deposit, where the majority of the high-grade mineral is located. Phase two includes access to and mining of the remaining deposit via an underground twin decline tunnel accessed from Ngāi Tahu Forestry land.

The Auld Creek Project comprises of the following activities:

- > Continued mineral resource investigation and exploration progression at Auld Creek;
- > Establishing a new surface facilities area which will house the surface infrastructure necessary to facilitate the development and operation of an underground mine located across privately owned farmland, disused Te Pūkenga land, and Ngāi Tahu Forestry land accessed via Quigleys Road;
- > The establishment and operation of a temporary Run of Mine (“**ROM**”) pad and associated haul road on Ngāi Tahu Forestry land;
- > The required construction and upgrades of ancillary infrastructure including new network utility connections, public and private road upgrades and service connections;
- > The construction, operation and maintenance of an access portal located on Ngāi Tahu Forestry land and associated access tunnel;
- > The construction, operation and maintenance of a km twin incline / decline tunnel extending from the access tunnel termination from Ngāi Tahu land to the Auld Creek orebody;
- > Construction, operation and maintenance of an access portal and associated straight line mine drive at the top of the orebody located on DOC land;
- > Construction, operation and maintenance of the Auld Creek Underground Mine;

- > Activities in and on waterways, including the possible damming, diverting, taking and use, and construction of structures over and in waterways (including culverts);
- > The take and use of groundwater;
- > Discharge of contaminants (including heat) to land, air and water;
- > The handling, salvaging, and possible incidental killing of any avifauna, invertebrates, aquatic and terrestrial (namely lizards) species across the Project Site;
- > Low impact surface and groundwater, ecological, meteorological, noise and vibration monitoring activities; and
- > Ancillary activities that are required to support the activities identified above.

An indicative layout of these components is shown in Figure 2 and included as **Attachment 2** to this application. Further detail of each Project component is provided below.



Figure 2: Auld Creek Project Site Layout

Resource Investigation and Exploration

Rua Gold currently holds a number of approvals for activities associated with mine resource investigation and exploration within the surrounding area (refer to Figure 3 below). Details of these existing approvals are summarised in Table 1 below and included as **Attachment 3** (exploration permits (“EP”)) and **Attachment 4** (access arrangements (“AA”)) to this application.

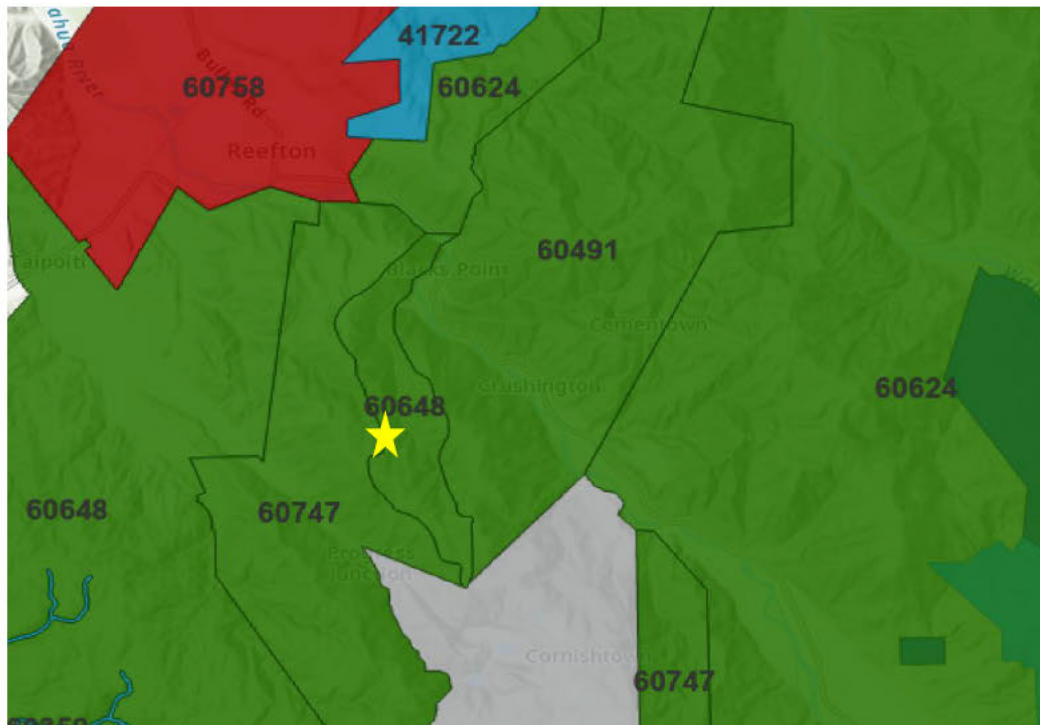


Figure 3: Existing Exploration Permit Areas (green) relative to the Project Site (star)

Table 1: Existing Mining related Approvals Relevant to the Project Area

Permit type and number	Owner	Operation Name	Tier	Date Granted	Expiry
Exploration Permit EP60648	Reefton Resources	Golden Point	2	19 Mar 2021	18 Mar 2026 ¹
Exploration Permit EP60747	Reefton Resources	Cumberland	1	14 Dec 2022	13 Dec 2027

¹ It is noted an extension to the permit for a further five years is currently processing with NZP&M (refer to section 3.7.1 below), the current permit is valid and remains in good standing. Rua Gold has met all permit obligations.

Permit type and number	Owner	Operation Name	Tier	Date Granted	Expiry
Access Arrangement 93190-AA	Reefton Resources	Golden Point	-	18 Jun 2021	18 Mar 2026 ²
Access Arrangement 109859-AA	Reefton Resources	Cumberland	-	21 Dec 2023	20 Dec 2028

Rua Gold has undertaken a 16,000 m drill program across the existing permits. Currently, three drill rigs are in operation, testing the Auld Creek deposit to further define the resource's extent. Two lodes³ have been identified; the Fraternal lode and Bonanza lode (refer to Figure 4 below). The Fraternal lode extends at least 400 m to the north based on surface gold-arsenic-antimony soil anomalism. It is noted that drilling is ongoing along this strike length. The Bonanza lode extends along a strike length of 350 m to 600 m located to the west of the Fraternal lode.

Subject to the most up to date drilling, the current inferred resource is recorded at 1.25 metric tonnes at a grade of 2.0 g/t Au (gold) and 1.2% Sb (antimony) containing 79,000 oz of Au and 10,000 tonnes of Sb (149,000 oz AuEq (Gold Equivalent)). The current indicated resource is recorded at 3.0 metric tonnes at a grade of 3.18 g/t Au(gold) and 1.2% Sb (antimony), containing 31,000 oz Au and 3,000 t Sb (54,000 oz AuEq). The proposed mining operation is expected to process around 200–250 kt annually.

Regarding the above general resource statement, please refer to the Technical Report on the Reefton Project, New Zealand, Report for NI 43-101 on the Reefton Project, New Zealand, prepared by RSC Consultants, dated 27 Feb 2026 (included as **Attachment 5** to this application). In the NI 43 101 Reefton Technical Report, the AuEq calculation was made using a gold price of \$US3000/oz and the Antimony price of \$US 25,000/t. Total gravity float recoveries of 97% for gold and 85% for antimony were used to calculate the Equivalency Factor at 2.15 for EqSb.

As discussed above, Rua Gold currently holds a number of approvals for activities associated with mine resource's investigation in the Reefton Area. These include approvals

² The five-year extension application for the Golden Point EP (refer to footnote 1) is also applied to the related access agreement as it is tied to the term of the exploration permit. The arrangement remains in good standing and Rua Gold has met all permit obligations.

³ A lode refers to a deposit of metal-containing minerals embedded in a rock formation or a vein of ore that is embedded between layers of rock with defined boundaries. These are commonly named to differentiate defined mineral veins.

for multiple drill sites within the Victoria Forest Park. These drill sites and associated arrangements and requirements (including weather stations) will remain within existing exploration permits and proposed mining permit (that Rua Gold is seeking as part of this referral application).

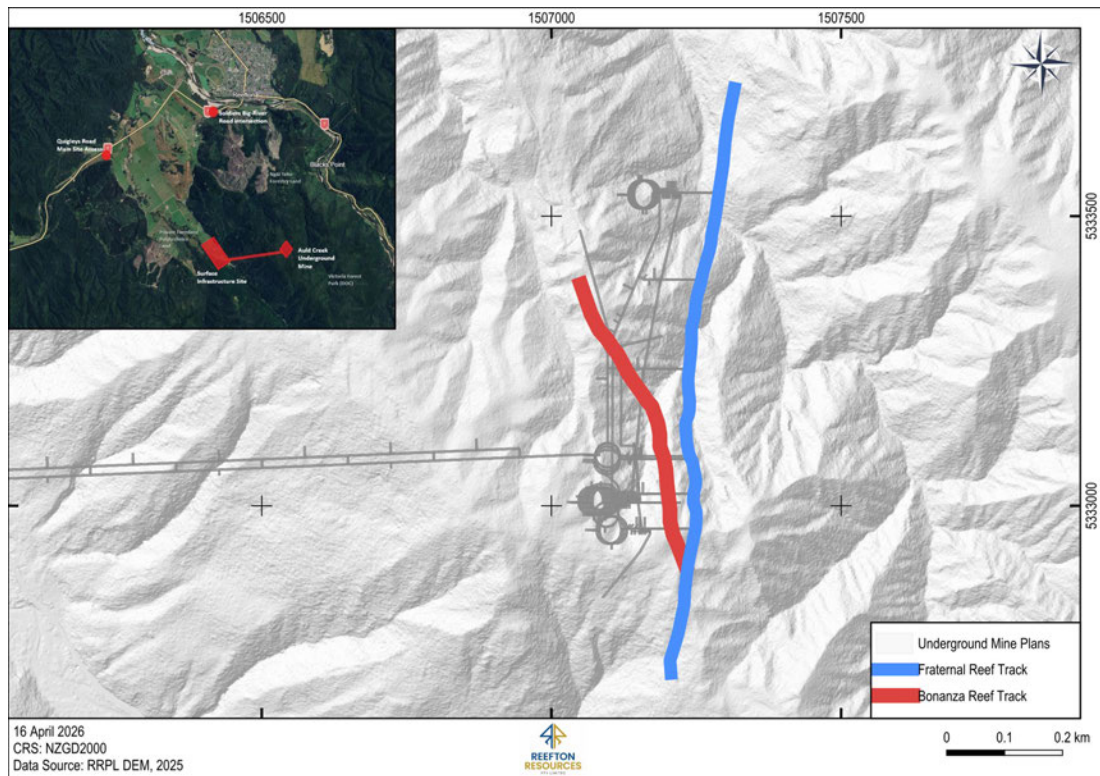


Figure 4: Auld Creek Gold-Antimony Deposit

2.2.1.2 Mining Method

The Auld Creek Project is proposed to employ safe, modern underground mining methods to extract economic ore from the deposit. These methods have been selected based on the characteristics of the known deposit and geotechnical considerations, the receiving environment and feedback received from the Department of Conservation and iwi. Figure 5 shows a cross section of the deposit looking north.

The Auld Creek deposit is described to have:

- > Narrow and tubular geometry;
- > An average thickness, with a width of approximately 6 m and wider zones up to 15 m;
- > Steeply dipping to sub-vertical lodes;
- > Poor to average ground conditions; and

- > Medium grade ore, with high grade ore located toward the top of the deposit.

Noting the poor geotechnical conditions, geologists initially recommended open-pit mining as the most cost-effective way to easily access and recover the high-grade ore from the top of the deposit. However, given that the deposit is located beneath a DOC-administered conservation area, alternative underground methods were explored and adopted to avoid adverse effects on the natural landform and vegetation as much as possible from the outset. It is further noted that an underground mining approach was indicated as a strong preference from both DOC and Ngāti Waewae as local iwi.

Based on the geological characteristics of the deposit and a key objective of minimising the mining footprint (avoiding an open-pit approach), the Project incorporates a combination of near-surface mining (via an adit) to recover high-grade ore and narrow-vein underground mining to access the remaining resource.

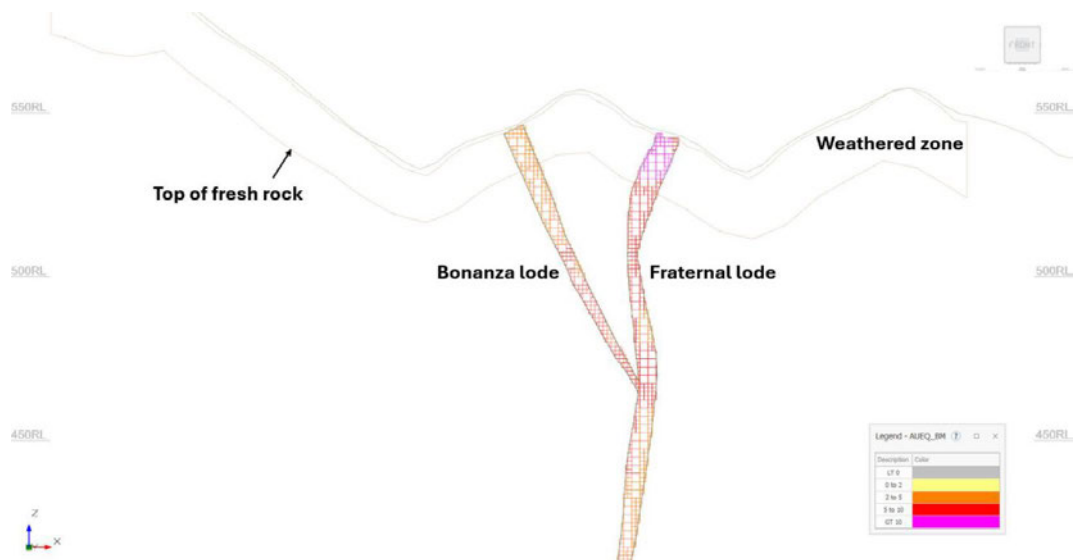


Figure 5: Cross section of Auld Creek Deposit Looking North

A Preliminary Economic Assessment (“**PEA**”) has been prepared by Mining One on the underground mine and is included as **Attachment 6** to this application as a reference.⁴ Mining One has identified Overhand Cut and Fill (“**OHCAF**”) using a combination of

⁴ A PEA is a conceptual study commonly undertaken in the early stages of resources projects and includes an economic analysis of the potential viability of the mining project and mineral resource. Rua Gold has engaged three separate PEA level studies addressing different components of the mining operation including the underground mine (prepared by Mining One), processing (currently being prepare by Pitch Black Group) and waste facilities (currently being prepare by Knight Piésold). It should be noted that Rua Gold has engaged a Pre-Feasibility Study.

cemented and uncemented fill as the most viable mining method.⁵ OHCAF was selected as the most suitable method for the Auld Creek Project when considering the above geological characteristics of the deposit and the geotechnical constraints. Mining One note Sublevel Open Stopping with cemented backfill as a possible method to be explored during future mining application Pre-Feasibility Studies as part of the substantive application.⁶

2.2.1.3 Project components

The key project components of the Auld Creek Project include two phases:

- > Phase one: Near surface portal and adit development on DOC land, and construction of a temporary ROM pad on Ngāi Tahu land; and
- > Phase two: Development of surface infrastructure area and associated twin incline / decline tunnel.

These components are described in further detail below. It should be noted that the phases align with the overall Project timeline, with phase one preceding phase two.

Near Surface Portal Development

Phase One of the mining operation includes a portal and adit development on DOC land to access the top section of the orebody via a narrow-vein mining technique. The portal access and mine drive will be smaller than those used in standard mining techniques, where drive dimensions are typically 5 m by 5 m. These smaller drives will require smaller mining equipment, which is generally low-emission, diesel-powered, and cost-efficient to operate and maintain. It has been confirmed that these machines can be sourced through New Zealand based companies. The portal access and adit will use the upgraded four-wheel-drive access tracks and cleared drill pad areas already approved under existing exploration permits. Required temporary surface infrastructure includes equipment laydown and storage areas, and sheds / offices for workers. Development of the adit and associated infrastructure will require an associated platform area.

The disturbance footprint required for this part of the mining operation will represent only a very small portion of Victoria Forest Park, amounting to well under one percent of the overall

⁵ The OHCAF mining method includes extracting ore from the bottom of the deposit and working upward. This method uses progressive stoping (a stope being the cavity left in the rock after ore is extracted) which is then filled and used as a new 'floor' as the operation moves upward.

⁶ The Sublevel Open Stopping mining method involves blasting or breaking ore along un-supported stopes, where broken ore gravitates to draw points at the bottom.

area, and seek to utilise existing disturbance areas (e.g. existing drilling areas) for the operational aspects of the mine (e.g. vent shafts).

The adit and related near surface mining infrastructure are temporary and will be removed following completion of the ore extraction. After recovery of the high-grade material, geotechnical stabilisation works will be carried out to secure the rock mass and enable safe ongoing mining from the underground portal access.

It is further noted that a temporary ROM and haul road may be constructed on Ngāi Tahu land toward the north of the Project Site. This will be in place while mining of the deposit via the adit is operational as phase one.

Twin Incline / Decline and Underground Mine Development

Access to the remaining orebody will be provided by a twin incline / decline tunnel. The portal access to the tunnel and underground mine will be located on Ngāi Tahu Forestry land and extend under DOC land to reach the orebody. The tunnel declines are likely to be smaller than 5 m high by 5 m wide, reflecting the narrow-vein mining approach discussed above; they will be supported by ventilation shafts to ensure sufficient air movement for safe and effective mining operations along the length of the tunnel.

The underground mine will be accessed via the two parallel inclines across the strike length of the Auld Creek deposit, with link drive development expected around every 100 m. The twin tunnels are required to ensure drives along the strike are short enough to be adequately ventilated. The incline tunnels will be located to the north and south of the orebody. The northern access incline will be used for primary exhaust ventilation with fans located at the entry pulling airflow into the mine. These ventilation shafts will be located across both Ngāi Tahu and DOC land. The link drives along this access will likely be progressively walled and sealed to extend the ventilation circuit. This northern access can also provide secondary egress for the mine.

Waste rock from the development of the inclines may be used for backfilling either on its own or mixed with a cement slurry, other forms of backfill may be used, for example, paste fill (sourced potentially from the processing of the material at the site). A conceptual underground layout of the mining operation is included in Figure 6.

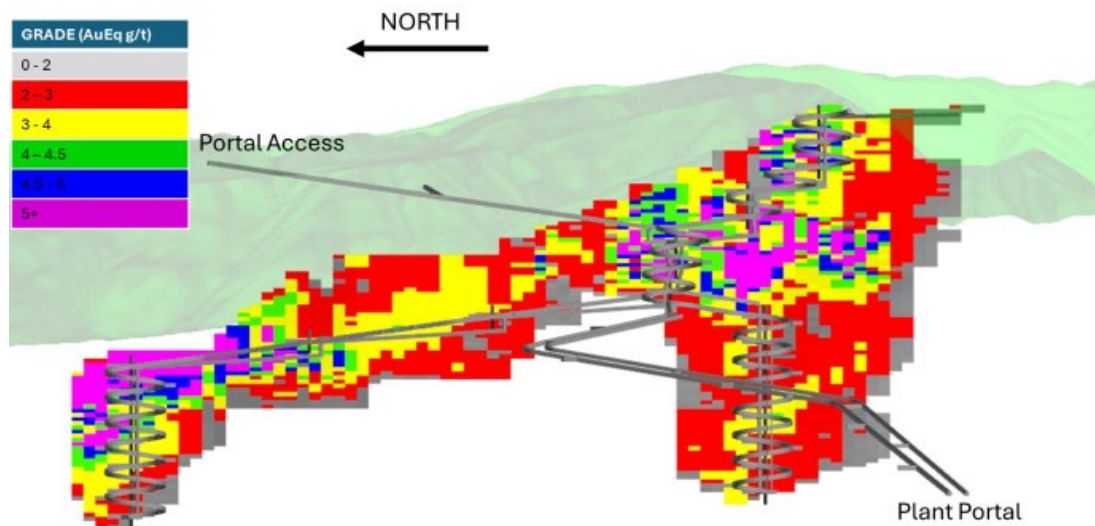


Figure 6: Proposed Underground Mine Layout (Facing East)

Surface Infrastructure

The location for the surface infrastructure was strategically chosen to ensure flat topography while maintaining an effective buffer from Reefton township. It is further noted that the proposed surface infrastructure site and design is purposeful and avoids the diversion of waterways

The required surface infrastructure for the Project will be located on disused Te Pūkenga land, private farmland and Ngāi Tahu Forestry land to the West of the Project Site (refer to Figure 7 below). The Project will be accessed from Quigleys Road. It is noted that Soldiers-Big River Road will require diversion to avoid the Project Site and to further avoid diverting Devils Creek. It is proposed that Soldiers-Big River Road will be diverted south to avoid the Project Site.

The anticipated surface infrastructure proposed to support site operations includes (but may not be limited to):

- > Site access and entry from Quigleys Road;
- > A Waste rock stack (“**WRS**”) and dry tailings storage facility (“**TSF**”);
- > Processing and tailing filtration facilities;
- > ROM pad;
- > Explosive magazine;

- > Ventilation fan, compressor plant, electrical switch yard;
- > Workshop and associated vehicle parking area;
- > Warehouse, offices and associated amenity facilities;
- > Mine water treatment facilities and ponds; and
- > Internal haul roads (repurposed existing Soldiers-Big River Road).

Processing of the ore will occur on site through a standard gold processing plant. The standard processing will produce one mineral concentrate which contains antimony and one mineral concentrate which contains gold. The concentrate containing antimony will then be sent offshore to specialist processing facilities that are able to then extract antimony and any remaining gold.

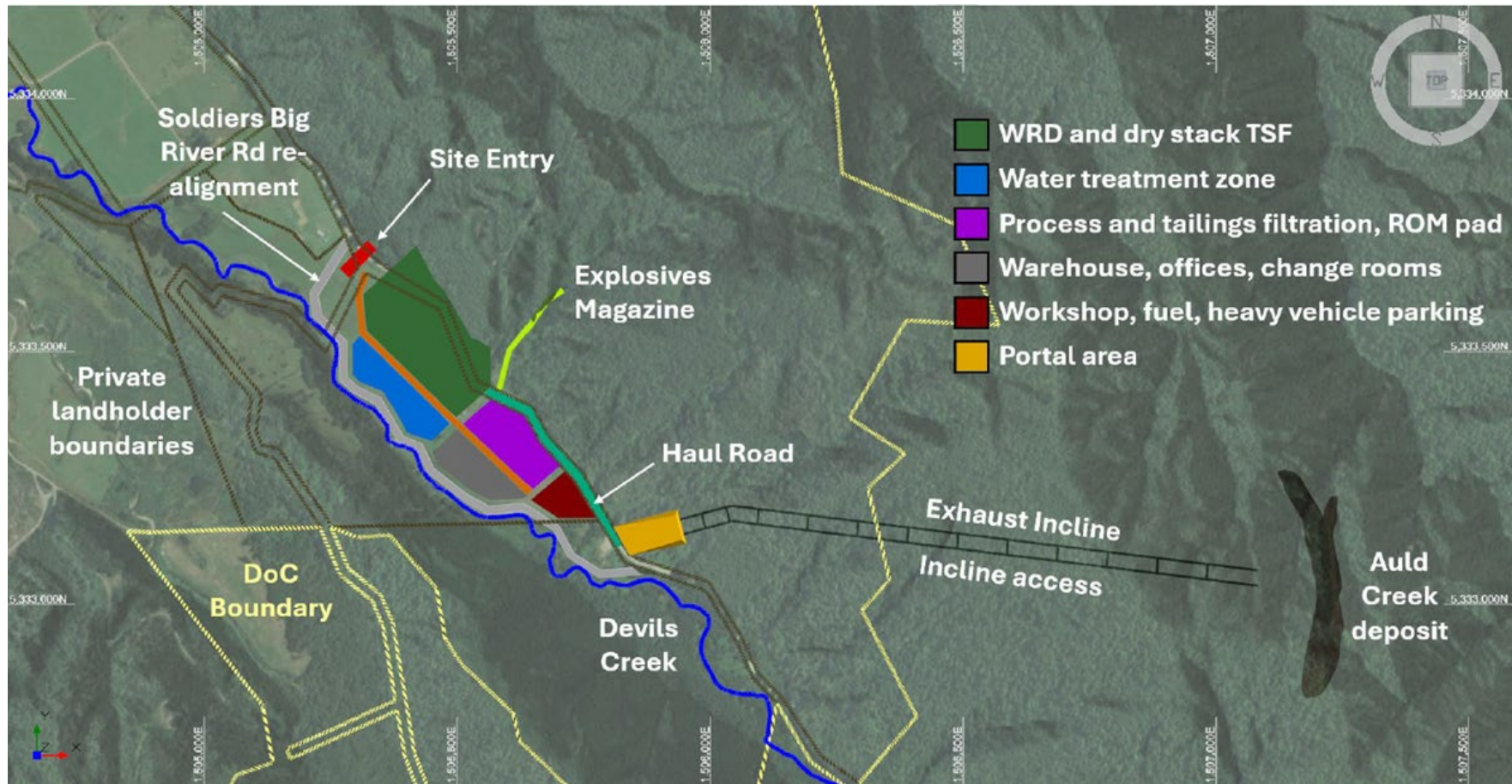


Figure 7: Auld Creek Surface Infrastructure Components



2.2.1.4 Processing and Tailings

The processing plant will be located on flat farmland. The key processing activities are described below:

- > Three-stage crushing, with fine ore-bin storage and emergency reclaim;
- > A single-stage ball mill, with a flotation cell treating cyclone overflow, producing an antimony/gold concentrate;
- > Separate gravity circuit to treat ball-mill discharge and flotation tails products to produce gravity gold Doré;
- > Concentrate dewatering using a thickener and a filter to produce a transportable concentrate; and
- > Appropriate tailings-handling facilities (including detoxification of cyanates) depending on plant location and underground paste fill requirements.

Gold recovery from the gravity circuit plus flotation concentrate are expected in the range of ~90-93%. Antimony recoveries using lead nitrate as an activator are expected in the range of 70-95%.

The tailings and processing waste facility is proposed to be located next to the processing facility, use a dry-stack methodology, and integrate waste rock storage. A possible secondary valley-fill design location is being explored for the tailings facility. Use of kilns, burners and / or furnaces may be required for processing of gold Doré. The design will give due consideration to Australian and New Zealand landform safety requirements, ICMM tailings design standards, and consider appropriate engineering design safety factors to address seismic risk.

2.2.1.5 Ancillary Infrastructure

A variety of ancillary infrastructure and activities will be required both within and beyond the Project Site to support the construction and ongoing operation of the Project. A high-level description of the anticipated ancillary infrastructure and required activities is provided below; further details on these components of the Project will be included in the substantive application.

Site Access

Vehicular access options to the Project Site are discussed in the Site Access Option Assessment prepared by Stantec (2026), included as **Attachment 7** to this application.

As noted above, Soldiers Big-River Road will be realigned westward, following Devils Creek. Diversion is required to avoid the Surface Infrastructure Site and eliminate the need to cross a public road during mining operations. This revised route provides a practical connection between the Mine Site and the Surface Infrastructure Site for transporting waste rock and ore. It is noted that during the operation of the mine, Soldiers Big-River Road will only be utilised for light vehicle movements.

Primary access to the Project Site will be via Quigleys Road, which intersects State Highway 7 (“SH7”) to the north. Quigleys Road is an existing private forestry road which is partly unformed. Four routes have been identified as options for accessing the Surface Infrastructure Site via Quigleys Road; each option will require upgrades to the road and new or upgraded river crossings, including bridges and/or culverts. The preferred access will be confirmed in the substantive application.

The intersection between Quigleys Road and SH7 will require a level of infrastructure upgrades to accommodate the activity and heavy vehicle movements. These upgrades are anticipated to include (but may not be limited to):

- > Widening of around 3 km to 4 km of road, including widening the Harwood Road and Quigleys Road carriageway between 5.5 and 6 m and providing passing bays along Quigleys Road;
- > New and / or improved river crossings;
- > Forming and /or upgrading existing access tracks;
- > Underground / relocation / barrier protection of power poles along SH7; and
- > Seal widening of Quigleys Road and SH7 in accordance with the New Zealand Transport Agency Waka Kotahi (“NZTA”) requirements.

External and Internal Road Network

In addition to access to the Project Site, improvement works will be undertaken to the existing vehicle / four-wheel drive tracks on DOC land to provide internal access between the temporary ROM on Ngāi Tahu land and the near surface portal. These works are minimal in terms of disturbance footprint and will include resurfacing and a level of regrading. Internal haul roads will be constructed to transport waste rock and ore from the underground mine site; it is likely these will repurpose the existing Soldiers Big-River Road. A map of existing access tracks located across the Project Site is included as **Attachment 8** to this application.

An existing bike track through the Vitoria Park Forest traverses over the ore body and within close proximity to the proposed mining operations. Although the track provides effective

internal access, to ensure adverse effects on recreational users of the bike track are effectively mitigated, the track will be diverted and reinstated via an alternative route.

Sections of SH7 and public road will also require improvement upgrades to allow for heavy vehicle movements to and from the Project Site during both construction and operation. These upgrades will be undertaken in accordance with the standard roading maintenance and upgrade procedures and agreed with the relevant roading authority (NZTA or the Buller District Council).

Network Utilities and Telecommunications

High voltage power will need to be brought to the site. The electrical load requirements for the Project will be further refined through the substantive application. However, at a high level, it is anticipated new power poles and powerlines will be required. It is noted existing powerlines located along Soldiers Big-River Road will need to be relocated or undergrounded during construction.

A switchyard may be required within the Project Site to connect new power lines and distribute power throughout the site.

It is likely that generators will be utilised to provide initial power to the site during construction. Any use of generators will be temporary.

A telemetry system may be required to facilitate communication between the various components across the Project Site.

Water, Stormwater and Wastewater

Provisions for three water connections will be further refined and detailed as part of the substantive application. A water source may be selected to provide potable water for use within the staff facilities on site. It is anticipated that stormwater and wastewater can be appropriately managed onsite. These options will be assessed and developed in accordance with recognised best-practice standards and relevant industry guidance, ensuring that all connections are designed and constructed to a high level of reliability and compliance.

Monitoring Activities

The proposed works will require a comprehensive environmental monitoring programme to assess the surrounding environment and evaluate the Project's potential impacts.

Monitoring activities will involve the use of various structures, instruments, and equipment both within and beyond the Project Site to ensure a comprehensive understanding of the Project's effects on surrounding sensitive receptors and the wider environment.

It is anticipated that the required monitoring activities will comprise:

- > Water monitoring including use of existing v-notch weir gauging stations within the Auld Creek, Soldiers Creek and Devils Creek catchments;
- > Noise and Vibration monitoring stations;
- > Dust monitors and track counters;
- > Meteorological masts and weather monitoring stations;
- > Wildlife monitoring stations; and
- > Groundwater / geotechnical piezometers.

2.2.1.6 Site Establishment

Site enabling works include site-wide geotechnical investigations and the preliminary activities required to establish construction facilities on-site. This includes construction of the site construction compounds and site access points, as discussed in more detail above. Traffic management and traffic controls may be required to support the safe movement of loads and local traffic. In addition, helipads may be established and helicopters used to support construction logistics, including the transport and placement of equipment required to set up mining operations on DOC conservation land where ground access is limited.

2.2.1.7 Rehabilitation and Closure

Rehabilitation is an integral part of all mining operations and a key consideration in mine development and planning.

A detailed rehabilitation plan for the mine site post-production will be implemented. At a high level the rehabilitation plan will address the following objectives:

- > To establish a vegetation cover over all disturbed areas;
- > To minimise maintenance after rehabilitation;
- > To protect water and soil from the effects of erosion and contaminants;
- > To restore disturbed watercourses to a natural stable condition; and
- > To visually integrate finished structures, landforms and vegetation into the surrounding landscape.

Key general rehabilitation activities include:

- > Backfill of stopes and ventilation shafts;

- > Removal of unnecessary monitoring equipment at mine closure; and
- > Removal of mining facilities, WRS, and rehabilitation of haul roads.

Rua Gold commenced a water monitoring program in late 2025 that collects weekly samples, helping build baseline knowledge of the waterways and drainage and will assist in establishing appropriate water quality compliance criteria once construction of the mine is underway and through its operation and rehabilitation phases. The water sampling program currently analyses Sulphate concentration, PH, Total Suspended Solids, Cyanide (WAD), Iron, Dissolved Arsenic, Dissolved aluminium, Nitrate nitrogen, Copper, Zinc and antimony. Monitoring of surrounding waterways will continue throughout the mine's life and throughout rehabilitation and closure activities.

2.2.2 Project Site Description

The proposed Auld Creek Underground Mine comprises of two main components – an underground mine and a near surface portal and adit – and the surface infrastructure to support the underground mining operations. From a property perspective, these project aspects are described as follows:

- > **Mine Site:** The land upon which the Auld Creek orebody is located and associated underground mine infrastructure including the main and temporary portals, adit, temporary ROM pad, haul roads and monitoring activities.
- > **Surface Infrastructure Site:** The land upon which surface infrastructure, access, and monitoring activities are located to support the Mine Site.
- > **The Project Site:** The entirety of the Project including both the Mine Site and Surface Infrastructure Site.

The Auld Creek Project is located approximately 3 km south of the Reefton township and is accessed off Quigleys Road south of State Highway 7. Reefton is a small township with a total population of 900. The Project is situated between a number of active and historic mines, including the OceanaGold Globe Progress Mine and the Endura Snowy River Mine.

The Project lies to the east of Devils Creek which traverses through the Surface Infrastructure Site. The Mine Site includes Victoria Forest Park as conservation land administered by DOC and Forestry Land owned by Ngāi Tahu. The Surface Infrastructure Site is located on privately owned flat farmland and pasture.

The Project is located wholly within the Buller District and West Coast Region. The Operative Buller District Plan (“**BDP**”) (2000) and the Te Tai o Poutini Plan (“**TTPP**”) (2025) attribute different areas of land with a specific zoning which reflects the intended purpose and dominant land use of that area. The zoning attributed to the Project Site under the BDP

is the Rural Zone. Under the TTPP, the Surface Infrastructure Site is subject to the General Rural Zone. Separately, the Mine Site is subject to the Open Space Zone.

The land to which the Project Site relates by either taking place on, intersecting, or going under, is owned by numerous entities, including The Crown, Te Pūkenga - New Zealand Institute of Skills and Technology and Ngāi Tahu Forestry Limited. The land holdings for The Project Site are legally described as follows (the Record of Titles are included as **Attachment 9** to this application):

- > Lot 2 DP 415798;
- > Section 1 SO 14685;
- > Section 23 Block XIII Reefton SD;
- > Section 9 Block XIII Reefton SD;
- > Part Section 185 SQ 131;
- > Part Section 24 Block XIII Reefton SD;
- > Part Section 25 Block XIII Reefton SD;
- > Section 177 Block XIII Reefton SD;
- > Section 176 Block XIII Reefton SD;
- > Lot 1 DP 415798;
- > Part Section 10 Block XIII Reefton SD;
- > Section 5 SO 14913;
- > Section 13 Block XIII Reefton SD;
- > Part Section 247 Block XIV Reefton SD;
- > Section 1 SO 15023;
- > Part Crown Forest Land Block IV Mawheraiti Survey District;
- > Lot 1 DP 15036;
- > Section 13 Block XIII Reefton SD;
- > Lot 2 DP 19065;
- > Lot 2 DP 514000;
- > Lot 1 DP 514000; and
- > Lot 1 DP 19065;

Additionally, as part of the mining permit included within this referral application, the Project incorporates a 'Mining Permit Area'. The Mining Permit Area (included as **Attachment 10** to this application and as Figure 8) spans the two existing exploration permits (EP 60648 and EP 60747) and multiple land parcels that include and extend beyond the Project Site defined above. The Mining Permit Area has been defined based on the interpretation of 'Permit Area' under section 4 of the Crown Minerals (Minerals Other than Petroleum) Regulations 2007 and includes the boundaries of existing exploration permits, the extent of the resource (including contingency for expansion of the resource) and the Mine and Surface Infrastructure Sites.

It should be noted that mining and associated activities are not proposed across all the land parcels which are included within the Mining Permit Area. The proposed activities are only relevant to the land parcels listed above, however in the instance that as the development of the Project progresses there comes a need to utilise other land parcels within the Mining Permit Area, this referral application seeks to include the Mining Permit Area in its entirety as a potential area for proposed works.

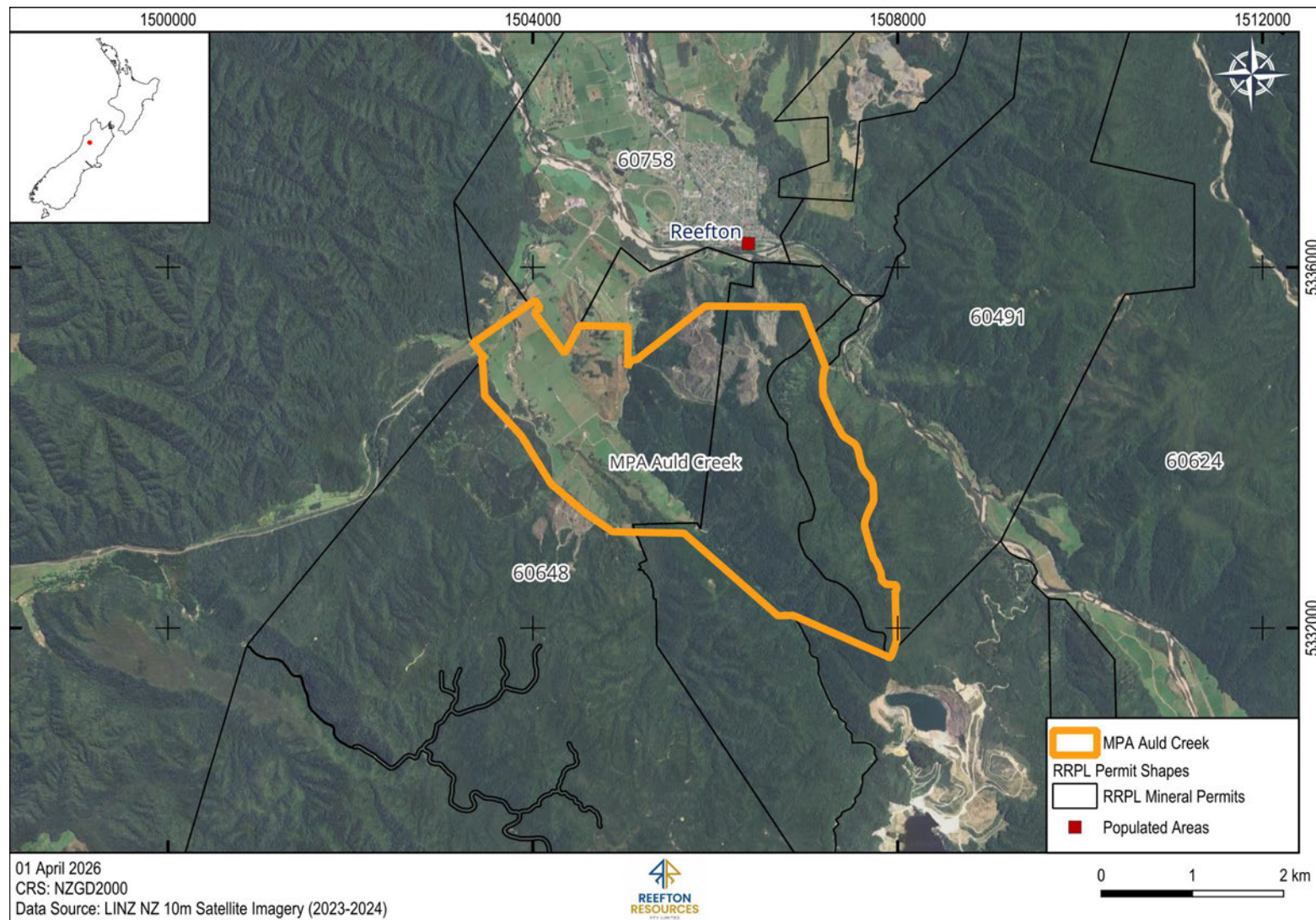


Figure 8: Proposed Auld Creek Project Mining Permit Area



2.3 INELIGIBLE ACTIVITIES

In accordance with section 5 of the Act, the Project does not meet the definition of an ineligible activity as the Project:

- > Will not occur on identified Māori land;
 - > It is noted the Ngāi Tahu Forestry land does not meet the definition of Māori Land under the Te Ture Whenua Maori Act 1993;
- > Will not occur in a customary marine title area;
- > Will not occur in a protected customary rights area;
- > Will not occur on Māori customary land;
 - > It is noted the Ngāi Tahu Forestry land does not meet the definition of Māori customary Land under the Te Ture Whenua Maori Act 1993;
- > Will not occur on land set apart as a Māori reservation as defined in section 4 of Te Ture Whenua Māori Act 1993;
 - > It is noted the Ngāi Tahu Forestry land does not meet the definition of Māori reservation;
- > Is not an aquaculture activity;
- > Will not occur on land described in Schedule 4 of the Crown Minerals Act 1991;
- > Will not require an access arrangement over land described in Schedule 4 of the Crown Minerals Act 1991;
 - > it is noted that the conservation area over which an access arrangement is sought for the Project does not meet the description of high value land recognised in Schedule 4 of the Crown Minerals Act 1991;
- > Is not an activity that would be prevented under section 165J, 165M, 165Q, 165ZC or 165ZDB of the Resource Management Act 1991;
- > Will not occur on land that is listed in Schedule 4 of the FTAA;
- > Will not occur on a national reserve held under the Reserves Act 1977;
- > Will not occur on a reserve held under the Reserves Act that is managed by someone other than the Department of Conservation or a local authority;
- > Is not a prohibited activity under the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012 or regulations made under that Act;

- > Is not an activity that is described in section 15B of the RMA or an activity that is prohibited by section 15C of the RMA;
- > Is not a decommissioning-related activity; and
- > Is not an activity undertaken for the purposes of an offshore renewable energy project.

Therefore, the Project is eligible to use the FTAA consenting process.

2.4 EXEMPTIONS FROM REQUIREMENTS TO PROVIDE AGREEMENT

2.4.1 Mining Activities

The proposed mining activity will not occur on land which is subject to an agreement with the relevant groups identified under Section 3.5 (or under section 5 subsection (1)(a), (b), (j), or (k) of the Act) and therefore does not require an exemption under section 5(2) of the Act.

2.4.2 Land Exchange

The Project is not located on land proposed to be the subject of a land exchange.

2.5 MINISTERIAL APPROVAL

The Project is not an activity that is seeking a ministerial determination under section 23 or 24 of the FTAA.

2.6 APPROPRIATENESS FOR FAST-TRACK APPROVAL PROCESS

2.6.1 Purpose of the FTAA

The purpose of the FTAA is to facilitate the delivery of infrastructure and development projects with significant regional and or national benefits. The Auld Creek Project is a significant mining project that will unlock mineral resources and deliver substantial regional and national economic benefits. The overall purpose and objective of the activity is to bring New Zealand's largest known antimony deposit into production. Antimony is a highly valued mineral across multiple industries, from finance to advanced technologies. Antimony is considered a critical mineral which occurs principally in association with orogenic gold bearing quartz veins in greywacke in Westland (Reefton) and in schist in Marlborough and Otago. Antimony exhibits unique physical and chemical properties that contribute to its durability, malleability, and resistance to tarnishing (refer to the Antimony Fact Sheet included as **Attachment 11** to this application).

In December 2024, Wood Mackenzie developed a Critical Mineral List for the Ministry of Business, Innovation and Employment (“MBIE”).⁷ Antimony was identified on this list and therefore considered to meet the following criteria:

- > Essential to New Zealand’s economy, national security, and technology needs, and/or equally important to New Zealand’s international partners; and is
- > Susceptible to supply disruptions domestically and internationally.

Specifically, antimony received a 6.6 supply risk score. Key uses of antimony include flame retardants, battery and energy storage, electronic and semiconductors, metallurgy and alloys, strategic defence and security, and medical and chemical applications. Antimony is considered a strategic mineral essential for supply chain resilience and security. This Project provides an opportunity to establish New Zealand as an additional contributor to the antimony supply chain, a strategically significant mineral.

Gold has also been included in the Final Mineral Strategy for New Zealand 2040 (released in January 2025). The inclusion of gold highlights its importance to New Zealand’s economy and contribution to achieving the overarching goal set out in the strategy of doubling mineral exports by 2035.⁸ The New Zealand government recognises gold is vital to New Zealand’s mining sector to enable further exploration and development of other critical minerals, such as antimony.

Gold and antimony are globally priced commodities traded in international markets; therefore, both revenue streams from the Project will directly add to New Zealand’s national income. Economic Evidence prepared by Eaqub & Eaqub Limited (2026) (included as **Attachment 12** to this application) assumes an antimony price of US\$27,250/tonne and a gold price of US\$4,116/oz, applying an exchange rate of NZD 0.58 to the USD this will average gold exports at \$217 m per year and antimony exports \$67 m per year over the eight years of production. This provides a total export revenue of \$2,269 m, with a net present value of \$1,636 m over the 8-year production period. It is clear the Project will undeniably provide a significant level of economic benefit at national level.⁹

⁷ <https://www.mbie.govt.nz/dmsdocument/29970-final-wood-mackenzie-report-on-the-development-of-a-critical-minerals-list-for-new-zealand-pdf>

⁸ <https://www.beehive.govt.nz/sites/default/files/2025-01/202501%20A%20Minerals%20Strategy%20for%20New%20Zealand%20to%202040.pdf>

⁹ It is noted that the economic model undertaken by Eaqub & Eaqub models the likely mine plan at the time of the substantive application. Therefore, the deposit amount, and associated opex and capex, are larger than what is described in the Underground PEA Report. The PEA is conservative and still being internally reviewed by Rua Gold at the time of this referral application submission.

In addition to the significant national benefits, the Project will provide a number of regional benefits, including considerable economic benefits and contribution to GDP, and significant increases to employment and future employment opportunities. The New Zealand Minerals Council provided a submission in support of the Project (included in **Attachment 13** to this application). The submission highlights the valuable contribution the Project will make to the Reefton community and economy.

Eaqub & Eaqub (2026) has identified a total GDP contribution of \$403 M per year across the production period, comprising \$162 m in direct mine value-added, \$179 M in indirect supplier activity. At a local and regional level the Project will add an average \$46 M per year to the Buller district's GDP across the production period and a further \$29 M accrued to the West Coast Region (Eaqub & Eaqub, 2026).

The Project will provide an average of 200 long-term jobs during the mining operation increasing to 267 during peak production between 2028 and 2029. During peak production, the total employment supported in the Buller district will reach 771 persons, including 267 direct, 402 indirect, and 102 induced. The Project is a progressive mining operation requiring a specialised skill set in underground, hard-rock narrow-vein mining methods. This is reflected in mining wages, which will average above \$100,000 and further drive induced consumption effects. Additionally, the Project will provide a continued generational opportunity for training and careers in the mining industry that is complementary to other industries within the West Coast Region and beyond.

The above outlines the Project's strategic and economic dimensions. It is evident that the Project will provide immense national and regional benefits across multiple facets, including both strategic geopolitics and global market strength, while also providing a significant level of economic benefits across the country and locally within the West Coast Region and Buller District. The Project, therefore, should be assessed in a whole-of-government context and recognised as a significant resilience and economic opportunity for New Zealand.

2.6.2 Criteria for Assessing Referral Application

Referring the Project to the fast-track approvals process will meet the criteria outlined in section 22, as outlined in the following sub-sections.

2.6.2.1 Would facilitate the project, including by enabling it to be processed in a more timely and cost-effective way than under normal processes

The FTAA established a streamlined decision-making process for development and infrastructure projects that deliver significant regional and national benefits. The Project involves approvals that would otherwise need to be applied for under a number of different

legislative processes (e.g. resource consents, wildlife permits, mining permits and associated arrangements, and concessions) before different regulators. Given the number of approvals required to authorise the Project, including the application for a mining permit, the use of the FTAA to authorise the Project will facilitate its delivery significantly faster than would otherwise occur under standard processes.

Further, consenting a new mine under the Resource Management Act 1991 (“**RMA**”) often takes multiple years. It is costly, lengthy, and challenging. Applications for mines are generally publicly notified processes attracting submissions from a range of parties in opposition, including nearby residents, mana whenua, the DOC, and various environmental groups. A hearing is inevitable, with extensive evidence and legal submission requirements placed on the applicant. A de novo appeal to the Environment Court is commonplace and can, if it proceeds to a hearing, add additional years to the consenting timeframe. The FTAA process will therefore significantly reduce the processing timeframe for the Project (by approximately 2 years) and the associated costs that would occur under normal processes.

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

The Project is a large-scale infrastructure project that will deliver significant national and regional benefits. However, the Project is not considered overly complex in that it is for the development of an underground mine, of which the effects are well understood and can be addressed through the implementation of appropriate management measures, as has occurred for the development of other mines within the West Coast region including the Snowy River Mine as a similar underground mining operation located approximately 17 km south of the Auld Creek Project. Rua Gold has commissioned independent technical reports to support the substantive application for the Project. The application will be of a high standard, ensuring it can be processed efficiently and will therefore not materially affect the efficient operation of the fast-track approvals process.

The Project will be able to apply for nearly all required approvals under the FTAA, including the proposed mining permit. Approvals required for the Project, which sit outside the FTAA process (as they are not provided in the Act), include access arrangements over privately owned land. These access arrangements are considered minor in scale and can easily occur in tandem with the application through processing and therefore will not materially affect the FTAA process. Required NZTA approvals associated with the public road construction and diversion will occur during detailed design and further into the construction phase of the process and therefore will not impact the FTAA process.

2.6.2.3 Has the Project been identified as a priority project in a central government, local government, or sector plan or strategy (for example, in a general policy statement or spatial strategy), or a central government infrastructure priority list

Whilst the Auld Creek Project itself has not been identified as a priority project, the New Zealand government has set clear goals and targets for the mining sector through the Mineral Strategy for New Zealand 2040, released by the Ministry of Business, Innovation and Employment (“**MBIE**”) in January 2025. The Mineral Strategy outlines a clear vision for the mineral sector which delivers for New Zealanders, now and into the future, by supporting a productive and resilient economy through responsible and sustainable practices.

Supporting this vision, MBIE have outlined a goal to double the value of mineral exports to \$3 billion by 2035¹⁰. The strategy further sets out three growth drivers to achieve this including:

- > Scaling up current mineral exports;
- > Realising new critical mineral opportunities in New Zealand; and
- > Adding value through domestic processing and refining, rather than exporting raw ore.

The Auld Creek project directly meets all three drivers identified within the strategy by:

- > Scaling up gold export as a current mineral in New Zealand, as highlighted in Section 2.6.1 above, the expected exports generated from the Project will be substantial and greatly assist in meeting the strategy’s goal;
- > The Project directly seeks to develop and realise the largest known antimony deposit in New Zealand as a highly valued critical mineral identified in the strategy. It should further be acknowledged that the Auld Creek Deposit is specifically identified within the strategy as the country’s most significant antimony resource; and
- > The Project includes expansion of processing in Reefton. Including the processing of antimony into a mineral concentrate on site and avoiding shipping raw ore offshore.

2.6.2.4 Will the Project deliver new regionally or nationally significant infrastructure or enable the continued functioning of existing regionally or nationally significant infrastructure

The Project will not directly deliver new regionally or nationally significant infrastructure, nor will it directly enable the continued functioning of existing regionally or nationally significant infrastructure.

¹⁰ <https://www.beehive.govt.nz/sites/default/files/2025-01/202501%20A%20Minerals%20Strategy%20for%20New%20Zealand%20to%202040.pdf>

However, the project will contribute a total \$359 M in tax contributions directly back to the crown, this is provided through royalties, income tax, and PAYE of direct employees (Eaqub & Eaqub, 2026). This contribution is considered to provide a substantial fiscal benefit which could contribute to the continued functioning of existing national infrastructure through government investment at a central level.

Additionally, the Project will contribute to upgrades regarding roading and other local infrastructure networks it requires to support the Project. Such upgrades could also prove beneficial to the immediate community through improved functioning and security of supplies.

2.6.2.5 Will the Project increase the supply of housing, address housing needs, or contribute to a well-functioning urban environment (within the meaning of Policy 1 of the National Policy Statement on Urban Development 2020)

The Project does not directly contribute to housing supply and is not located in an urban environment.

2.6.2.6 Will the Project deliver significant regional and national economic benefits

The Project will deliver significant economic benefits at the local, regional, and national levels. Eaqub & Eaqub (2026) assess that without this project, the \$597 m of foreign capital will not take place, exports of \$2.3 b will not be realised, and 200 well-paid permanent jobs will not be created in Buller / West Coast.

The direct, indirect and induced economic benefits of the Project associated with the construction and operation of the Auld Creek project include:

- > Export Revenue: Total export revenue over the production period is estimated at \$2,269 m, with a net present value of \$1,636 m. It is noted that even under conservative assumptions, annual exports remain above \$214 m.
- > Expenditure (FDI): The applicant is a subsidiary of a foreign company based in Vancouver, Canada, and therefore requires capital to develop the Project for Foreign Direct Investment (“**FDI**”). FDI attributable to this Project is in the order of \$597 m. It should be noted that exploration expenditure across the Reefton goldfield accounts for \$233 m of this, solidifying Rua Gold as a long-term contributor to the local and regional economy.
- > Expenditure (NZ): Total New Zealand-based expenditure, capital and operating, net of identified large imports, averages \$125 m per year, totalling \$1,125 m over the project life.

- > **Spending:** Even utilising a conservative approach to calculate the total GDP contribution based on the Project's New Zealand-based spending (where large, imported items such as specialist mining equipment have been excluded); over the full Project lifecycle, the total GDP contribution reaches \$3,627 m, with a net present value of \$2,462 m.
- > **Employment Effects:** Including indirect and induced employment in Buller, the total employment effect in the district averages 477 persons across the production period. At peak activity in 2028, total employment supported in the Buller District reaches 771 persons: 267 direct, 402 indirect, and 102 induced. It should further be noted that mining wages average well above \$100,000, which drives larger induced economic benefits.
- > **Royalties and Tax:** The calculated total tax contribution of the Project is \$359m (NPV: \$261m).

2.6.2.7 Will the Project support primary industries, including aquaculture

Mining is a primary production activity (as defined in the National Planning Standard 2019) and as outlined above, the Auld Creek Project will support employment opportunities for mine workers, investment to facilitate operations and infrastructure and security. Referral to the FTAA process would promote investor certainty in the near and long term and encourage further investment in exploration and development at Reefton. The Project will therefore make a significant contribution to the continued support of New Zealand's primary industries.

2.6.2.8 Will the Project support development of natural resources, including minerals and petroleum

The Project will directly support the development of natural resources through mining for the extraction of minerals (gold and antimony). The Project will enable the extraction of these natural resources, which will, in turn, generate significant regional and national benefits, including significant employment and economic benefits.

2.6.2.9 Will the Project support climate change mitigation, including the reduction or removal of greenhouse gas emissions

The proposed mining operation will not directly support climate change mitigation, including the reduction or removal of greenhouse gases.

However, the development of the Auld Creek antimony deposit can support low-carbon and renewable energy technologies. Antimony is essential in lead-acid batteries, where it improves strength, corrosion resistance, and charge efficiency. Antimony is commonly used in electric vehicles and renewable energy storage.

2.6.2.10 Will the Project support climate change adaptation, reduce risks arising from natural hazards, or support recovery from events caused by natural hazards

Similar to the above, the Project will not directly support climate change adaptation, reduce risks from natural hazards, or recovery from natural hazard events.

As discussed above, antimony is a key mineral used across multiple innovative and sustainable technologies, and the use of those technologies may play a role in climate change adaptation and natural hazard risk.

2.6.2.11 Will the Project address significant environmental issues

Climate change is a significant environmental issue that New Zealand (and the world) faces. The Project will bring a significant deposit of antimony into production, which is a mineral used for renewable and low-carbon emission technologies, which contribute to a shift away from fossil fuel use.

2.6.2.12 Will promote competition in the grocery industry

The Project will not directly promote competition in the grocery industry.

2.6.2.13 Is the Project consistent with local or regional planning documents, including spatial strategies

The Project seeks resource consents that would otherwise be applied for from the West Coast Regional Council and Buller District Council. A brief assessment of the Project against the relevant planning documents is provided below

The relevant local and regional planning documents include:

- > West Coast Regional Policy Statement 2020 (“**RPS**”)
- > West Coast Regional Land and Water Plan (“**RLWP**”)
- > West Coast Regional Air Quality Plan (“**RAQP**”)
- > Buller Long Term Plan (“**LTP**”)
- > Operative Buller District Plan (“**BDP**”)
- > Te Tai o Poutini Plan (“**TTPP**”)
- > Te Rūnanga o Ngāi Tahu's Freshwater Policy Statement (“**FPS**”)

West Coast Regional Policy Statement 2020

The RPS sets out the overarching resource management framework for the West Coast region, providing high-level direction to guide regional and district plans, resource consent

decisions, and other RMA-related processes. The current operative RPS became fully operative on 24 July 2020, following a comprehensive review process.

Of most relevance to the Project, the RPS recognises the regional importance of mining and aims to enable development while managing environmental impacts.¹¹ This, therefore, includes the Auld Creek Project as a regionally important mining development. The relevant policy direction seeks to provide for mining activities while promoting sustainable management and development, ensuring benefits are realised, and the needs of current and future generations are met.¹² This policy direction supports the Project, which includes sustainable mining practices, such as an underground operation with an emphasis on a small footprint, particularly regarding disturbance effects. Further, the Project has been designed to integrate effectively into the existing environment, with the location of surface infrastructure strategically chosen to avoid existing residential areas and potential future reserve sensitivity effects.¹³

As noted above, the Project has been strategically designed to minimise environmental impact by reducing the mine's footprint as far as practicable. This includes the proposed underground operation. Although conceptual studies for the Project suggested open pit mining as the simplest and most cost-effective method, an underground option has been adopted to minimise and avoid adverse effects on the natural environment. This design decision ensures minimal modification and effects on vegetation, habitats, landscapes, and natural character.¹⁴ Rua Gold has commissioned a team of over 30 independent advisors and consultants to conduct studies and investigations into the benefits and potential impacts of the Project; best practices will be employed throughout the mine development to ensure ecological values are maintained and, where possible, provided for.¹⁵ This further aligns with the policy direction, which seeks to recognise that maintenance of habitat and indigenous vegetation is more efficient than restoration.¹⁶

A comprehensive restoration and rehabilitation plan will be implemented for the mine's closure, with key objectives of achieving positive ecological outcomes and restoring natural patterns, elements, and character to the area.¹⁷ Additionally, the management of the effects of the Project will be directed by the outcomes sought in the RPS. This includes the

¹¹ Objective 1 of Chapter 5, West Coast Regional Policy Statement 2020.

¹² Policy 1 of Chapter 5, West Coast Regional Policy Statement 2020.

¹³ Policy 2 of Chapter 5, West Coast Regional Policy Statement 2020.

¹⁴ Objective 2 of Chapter 7, West Coast Regional Policy Statement 2020.

¹⁵ Policy 2 of Chapter 7, West Coast Regional Policy Statement 2020.

¹⁶ Policy 8 of Chapter 7, West Coast Regional Policy Statement 2020.

¹⁷ Policy 2 of Chapter 7B, West Coast Regional Policy Statement 2020.

application of the effects management hierarchy and the avoidance, remedying, or mitigation of adverse effects of the Project, and, if residual adverse effects remain, Rua Gold will seek to offset and compensate for these effects to the extent practicable. The RPS provides for offsetting and compensation for indigenous biological diversity when residual adverse effects cannot be avoided, remedied or mitigated, to achieve a no net loss, and preferably, a net gain in indigenous biological diversity.¹⁸

The Project will ensure that the best practicable options are used to mitigate the effects associated with the key sources of contaminants in water and air. An air quality management plan will be used to implement a comprehensive dust and meteorological monitoring programme to ensure discharges to air are appropriately managed throughout the construction and operation of the mine.¹⁹ Various water related management plans will also be prepared and an appropriate suite of nationally and internationally respected experts have been engaged in this regard.

Rua Gold recognises the relationship with Te Rūnanga o Ngāti Waewae (as papatipu rūnanga who represent the tangata whenua interests of Poutini Ngāi Tahu) has with the waterbodies and environmental landscape that form the Auld Creek Project and is committed to ensuring the effects of the Project on these values are appropriately addressed.²⁰ At this stage in the Project, Ngāti Waewae has expressed support for the Project (included in **Attachment 13** to this application), and Rua Gold will continue to consult and work closely with Ngāti Waewae to provide for the protection of their wāhi tapu and other taonga from adverse effects and recognise their role as kaitiaki over te taiao (the environment).²¹

West Coast Regional Land and Water Plan

The Regional Land and Water Plan became operative on 27 May 2014. The region-wide objectives which are most relevant to the Project include:

- > To provide for the sustainable use and development of land and water resources;²²
- > To protect water bodies from inappropriate use and development by maintaining and where appropriate enhancing their natural and amenity values including natural character and the life supporting capacity of aquatic ecosystems;²³

¹⁸ Policy 5 of Chapter 7, West Coast Regional Policy Statement 2020.

¹⁹ Object 2; Policy 2, Chapter 10, West Coast Regional Policy Statement 2020.

²⁰ Objective 2 of Chapter 3, West Coast Regional Policy Statement 2020.

²¹ Policy 2 & 3 of Chapter 3; Objective 5 of Chapter 4, West Coast Regional Policy Statement 2020.

²² Objective 3.2.1, West Coast Regional Land and Water Plan 2014.

²³ Objective 3.2.2, West Coast Regional Land and Water Plan 2014.

- > To maintain or, where appropriate, enhance the spiritual and cultural values and uses of significance to Poutini Ngāi Tahu;²⁴
- > To avoid or mitigate the exacerbation of any natural hazard or the creation of a hazard;²⁵
- > To avoid remedy or mitigate adverse effects from land disturbance so that the region's water and soil resources are sustainably managed;²⁶
- > To retain flows and water levels in water bodies sufficient to maintain their in-stream values, natural character, and life supporting capacity;²⁷
- > To ensure that the adverse effects from the discharge of hazardous substances into or onto land, on water and soil quality, social, cultural, and amenity values, indigenous flora and fauna, and human health are avoided, remedied, or mitigated;²⁸ and
- > To avoid, remedy, or mitigate risks to the environment presented by discharges from contaminated land, including risks to human health, social, cultural, and amenity values, and soil and water quality.²⁹

Rua Gold will ensure the Project meets the outcomes of the above objectives and associated policies are met through the implementation of best practice construction management, including erosion and sediment control measures, water quality monitoring in accordance with the relevant water quality standards set out in the RLWP (or site specific as recommended by its advisors as may be appropriate), and appropriate rehabilitation of sites following the completion of construction activities and closure of the mine. Water quality limits will be set utilising an integrated, cross-disciplinary approach that accounts for all components of the Project to ensure the health of surrounding waterbodies and ecosystems is maintained. Rua Gold will ensure that any discharges from its on-site activities are appropriately managed (through a comprehensive suite of management plans and/or Trigger Action Response Plans (“**TARPs**”)) so that they do not adversely affect the health of people and communities or the life-supporting capacity of the freshwater body.

Water take limits for the Project will be determined once the underground mine design and operational water demands are further refined and a preferred water supply option is identified. Any take from freshwater resources (surface water and / or groundwater) will be

²⁴ Objective 3.2.3, West Coast Regional Land and Water Plan 2014.

²⁵ Objective 3.2.4, West Coast Regional Land and Water Plan 2014.

²⁶ Objective 4.2.1, West Coast Regional Land and Water Plan 2014.

²⁷ Objective 7.2.1, West Coast Regional Land and Water Plan 2014.

²⁸ Objective 15.2.1, West Coast Regional Land and Water Plan 2014.

²⁹ Objective 16.2.1, West Coast Regional Land and Water Plan 2014.

assessed against the existing receiving environment, current authorised uses and in-stream values, to ensure that ecological, cultural and human-use values are maintained and that adverse low-flow effects are avoided or appropriately mitigated. The final water supply strategy (including any reliance on recycling, storage or alternative supply methods) will be developed to demonstrate efficient use of water and to avoid contributing to overallocation within the Devils Creek catchment, taking foreseeable future demand into account.

Further, the effects of the Auld Creek Project will be appropriately managed in a manner that is sustainable and consistent with the relevant policy direction set out in the RLWP. This includes the management of any effects of the Project on wetland and streams for which Rua Gold will apply the effects management hierarchy. This is a pathway that is provided for through the policy direction in both the RLWP and the National Policy Statement for Freshwater Management. It should be noted that Rua Gold has applied the effects management hierarchy from the inception of the Project through design decisions, including the strategic location of the Surface Infrastructure Site, to avoid diversion of waterways, including Devils Creek, and associated adverse effects. Similarly, the proposed underground mining approach, as opposed to open pit options as previously discussed in section 2.2.1.2, seeks to minimise extensive vegetation removal and associated adverse effects on the natural landform of Victoria Park Forest where possible.

In accordance with relevant policy direction, the Project also has a functional need to be in this location. Rua Gold will seek to avoid adverse effects on wetlands and streams to the greatest extent practicable; however, it may not be possible to completely avoid such effects due to the nature of the site. If this is the case, Rua Gold will ensure that unavoidable effects are appropriately managed through application of the effects management hierarchy. This will be detailed further in the ecological assessment submitted with the substantive application. On closure of the mine, the site will be rehabilitated in line with the closure plan, which will set out key objectives aligned with the RLWP.

Given the above, the Project is consistent with the outcomes set out in the RLWP.

West Coast Regional Air Quality Plan

The Regional Air Quality Plan became operative in 2002 and was amended in 2024 and 2025. The RAQP seeks to:

- > Avoid, remedy or mitigate adverse effects on amenity values, human health and ecosystems arising from the discharges of odour and dust;³⁰

³⁰ Objective 7.3.1 & Policy 7.4.1, West Coast Regional Air Quality Plan 2002.

- > Avoid, remedy or mitigate adverse effects from the discharge of products of combustion to air;³¹ and
- > Promote the reduction of discharges of ozone depleting substances, and the reduction of greenhouse gases.³²

It is considered that through the employment of best practice methods and effective management plans, the Auld Creek Project will ensure any adverse effects in relation to the deposition and discharge of dust are effectively avoided, remedied and mitigated, aligning with the RAQP objectives and policies.

Buller Long Term Plan 2025-2034

The Buller LTP sets out the spatial strategic direction for the district over a nine-year period and includes a 30-year Infrastructure Strategy. The most recent LTP was published in 2025 and came into effect on 1 July 2025. The Project is consistent with the LTP, which identifies infrastructure funding and affordability as key issues throughout the district. This is specifically regarding transport and three-water services. The Project will provide for infrastructure upgrades within the Reefton area (at least in the vicinity of the Project site) and, in turn, increase infrastructure resilience and service reliability for the local community. In this regard, the Project will be self-sufficient and will not place an additional or undue pressure on existing Council services or infrastructure. Consultation and collaboration are key principles underpinning the Project, and this is considered aligned with the Buller District LTP and the associated Infrastructure Strategy.

Operative Buller District Plan

The BDP was made operative in January 2000. The Buller District is currently operating under two district plans after the public notification of the Te Tai o Poutini Plan on 10 October 2025. As the TTPP progresses through the appeals process, the BDP remains operative with relevant objective and policies remaining applicable to the Project.

The Buller District Plan seeks to promote the sustainable management of natural and physical resources of Buller District. The BDP recognises mineral investigation as an important facet of the community's wellbeing and viability and seeks to ensure that mining activities are carried out in a way that promotes sustainable management by avoiding, mitigating, and remedying any adverse effects.³³ The policy direction within the BDP with

³¹ Objective 8.3.1, West Coast Regional Air Quality Plan 2002.

³² Objective 9.3.1, West Coast Regional Air Quality Plan 2002.

³³ Objective 4.5.4, Buller District Plan 2000.

regard to mineral resources seeks to ensure rehabilitation of mining sites, which prioritise indigenous vegetation cover;³⁴ effective coordination with the WCRC to effectively safeguard water and soil resources;³⁵ provide for mineral resources and associated mining operations which are of a regional significance, where measures are incorporated to protect water quality and ecosystems;³⁶ recognise and the significant impacts mining activities have on local rural communities, in particular on social and economic factors.³⁷

The BDP Policy framework anticipates mineral extraction and other associated activities, subject to the appropriate management of effects. The policy direction notes a strong relationship with the regional council is required to effectively implement the above policies and procedures, with specific regard to ecological and freshwater values and effective monitoring programmes.³⁸

Rua Gold and the Project will meet the intended environmental outcomes aligned with this policy direction through:

- > Avoiding and mitigating adverse effects on the surrounding natural landscapes through the development of an underground mining operation, effectively reducing the mining footprint and any significant physical alteration to the Victoria Forest Park;³⁹
- > Comprehensive reporting and assessment of the surrounding environment and any indigenous vegetation and habitats of indigenous fauna will inform the Project and any associated mitigation and management measures to ensure effects on natural features are appropriately avoided and mitigated;⁴⁰ and
- > Regular monitoring will be in place throughout the development and operation of the mine to ensure the mitigation measures are effective;⁴¹ and
- > Rua Gold will consult with the District Council and local community to ensure rehabilitation of the mine will achieve the desired outcomes⁴²

³⁴ Policy 4.5.5.2 and Policy 4.5.5.6, Buller District Plan 2000.

³⁵ Policy 4.5.5.3, Buller District Plan 2000.

³⁶ Policy 4.5.5.7, Buller District Plan 2000.

³⁷ Explanation 4.5.7.3, Buller District Plan 2000.

³⁸ Method 4.5.6.2, Buller District Plan 2000.

³⁹ Environmental Outcome 4.5.8.2, Buller District Plan 2000.

⁴⁰ Environmental Outcome 4.5.8.2, Buller District Plan 2000.

⁴¹ Monitoring Outcome 4.5.9.2, Buller District Plan 2000.

⁴² Environmental Outcome 4.5.8.3, Buller District Plan 2000

It is further noted that investigation and utilisation of the district's mineral resources are provided for within the Rural Zone in which the Project is located. The Rural Zone chapter notes that the effects of mineral-related activities depend on their scale (i.e., investigation, exploration, and extraction) and provides the corresponding activity status to ensure the council has the appropriate level of discretion.⁴³

The Project is therefore consistent with the Buller District Plan.

Te Tai o Poutini Plan

The TTPP is the combined District Plan for the West Coast, covering Buller, Grey and Westland districts. The TTPP was publicly notified on 10 October 2025 and the appeals period closing on 19 January 2026 and 2 February 2026. Therefore, the TTPP is partially operative and is applicable to the Project. It is noted the Strategic Direction chapter of the TTPP is under appeal, however, assessment has been provided for completeness.

Mineral extraction is provided for as a key strategic direction for West Coast district councils with a policy direction to provide for the use and development of the West Coasts mineral resources while managing adverse effects on the environment.⁴⁴ The TTPP has designated two zones for mineral development on the West Coast: the Buller Coalfield Zone and the Mineral Extraction Zone. Currently, the site is not zoned for these purposes because these zones are intended to reflect existing mining operations or approvals that are already in place. As a result, the site is currently located within the General Rural Zone and the Open Space Zone. Both of these zones, however, acknowledge the broader mineral resources available in the districts. The Project is appropriately located, having regard to the level of separation between the Reefton township and surrounding rural dwellings. It is also noted that mining activities have occurred both historically and currently within the immediate and surrounding locality. Accordingly, the Project is not considered to represent an inappropriate departure from the existing environment. It is further noted that the Project will deliver significant regional and national benefits both economically and strategically for New Zealand. As assessed further below, it is considered any adverse effects on the environment can be appropriately and effectively managed.⁴⁵

In regard to natural character and indigenous biodiversity, the TTPP seeks to protect and, where necessary, restore the natural character and indigenous biodiversity which contribute

⁴³ Explanation 5.3.2.5.9, Buller District Plan 2000.

⁴⁴ Objective MIN-O1, Te Tai o Poutini Plan (Operative in Part) 2026.

⁴⁵ Policy MIN-P1 and Policy MIN-P2, Te Tai o Poutini Plan (Operative in Part) 2026.

to the West Coast's character and identity.⁴⁶ In acknowledging the actual and potential conservation values within the Victoria Forest Park, the Project has adopted an underground mining operation to ensure a minimal impact on the natural landform, effectively avoiding any changes or drastic modification to the natural formed ridgeline, landscape and vegetation as commonly seen in other mining methods such as open-pit mining. This is aligned with the policy direction provide for under NENV-P2 of the TTPP.

As discussed below, Rua Gold has ensured effective, consistent and active engagement with Ngāti Waewae as Te Rūnanga o Ngāi Tahu hapu. Through this engagement and consultation, Rua Gold will ensure Ngāti Waewae and Te Rūnanga o Ngāi Tahu are supported in exercising their right of kaitiakitanga and ensure their values and aspirations over te taiao are provided for.⁴⁷

Tourism is recognised as a key strategic direction for the West Coast districts, given its economic benefits.⁴⁸ There is an opportunity for the Project to contribute to the tourism industry within the Buller district both throughout the operation of the Project and closure of the mine. Mining is recognised as a defining industry for the West Coast both historically and presently. There is an opportunity for the mine to become a destination for hikers and bikers to experience mining and haul roads up close when using the rerouted Globe Hill Track through the Victoria Forest Park. The proposal will also not detract from or reduce current recreational or tourism opportunities in the area, as existing cycle and pedestrian access will be retained. Additionally, upon closure, there is an opportunity to repurpose the haul roads and any remnants of the access portals and infrastructure as tourism ventures to educate tourists on mining and sustainability practices / positive mining outcomes.⁴⁹ As such the Project is consistent with the TTPP.

Te Rūnanga o Ngāi Tahu's Freshwater Policy Statement

Te Rūnanga o Ngāi Tahu's Freshwater Policy Statement (“**FPS**”) is the first FPS to be produced by Te Rūnanga o Ngāi Tahu. It covers the rohe of Ngāi Tahu as described in Te Rūnanga o Ngāi Tahu Act 1996 (which includes the West Coast region). It describes in general terms:

- > Ngāi Tahu's association with freshwater resources;

⁴⁶ Objective NENV-O1, Te Tai o Poutini Plan (Operative in Part) 2026.

⁴⁷ Objectives POU-O1, POU-O3 and POU-O4, Te Tai o Poutini Plan (Operative in Part) 2026.

⁴⁸ Objective TRM-O1, Te Tai o Poutini Plan (Operative in Part) 2026.

⁴⁹ Policy TRM - P1, Te Tai o Poutini Plan (Operative in Part) 2026.

- > The ways in which Ngāi Tahu as tangata tiaki want to participate in freshwater management; and
- > The environmental outcomes sought.

The FPS has the status of an Integrated Management Plan as Te Rūnanga o Ngāi Tahu has formally adopted it as such. Of relevant to the Auld Creek Project is Objective 6.2 of the FPS which seeks to restore, maintain and protect the mauri of freshwater resources. Policy 6.2.1 is also relevant as it seeks to identify freshwater resources where:

- > Mauri is unaffected by modification and human activity so that these waterbodies can be afforded total protection; and
- > Mauri is adversely affected, and the activities that cause such effects.

As noted above, Rua Gold will implement best-practice measures to avoid any adverse effects on local water bodies to the extent practicable. Rua Gold has undertaken, and will continue to undertake, a comprehensive water monitoring programme to ensure adverse effects on water quality and freshwater ecology are understood and avoided as far as practically possible. Rua Gold has a strong relationship with Te Rūnanga o Ngāti Waewae and are committed to working with Te Rūnanga o Ngāi Tahu to ensure all relevant objectives and policies are realised throughout the Project.

3. PROJECT DETAILS

3.1 APPROVALS REQUIRED

If the Project is successfully referred and the requisite approvals obtained, it is anticipated that the construction phase of the Auld Creek Project will commence in 2027 and be completed in 2028, with mining to continue for six to eight years after the construction phase.

An outline of the approvals being sought via this referral application are provided below.

3.1.1 Resource Management Act 1991

Buller District Council

The Buller District is currently operating under two District Plans – the Operative Buller District Plan and Te Tai o Poutini Plan. The consents that are required for this Project under each Plan are outlined in the table below.

The TTPP is the new proposed combined District Plan for the Buller, Grey and Westland District Councils. Decisions on the TTPP were notified on 10 October 2025, meaning that all rules now have legal effect. A number of appeals have been filed on the TTPP decisions, meaning that not all rules can be treated as operative. However, greater weighting on TTPP provisions will now be applied, noting the corresponding provisions in the operative BDP cannot yet be disregarded.

Rule	Rule Summary	Project Activity	Activity Status
Operative Buller District Plan			
Part 5 Character Areas and Zone Rules			
Rule 5.3.2.4.3.	Mining and incidental earthworks	Proposed mining and earthworks activities.	Restricted Discretionary
Rule 5.3.2.4.4.	Indigenous vegetation clearance and incidental earthworks exceeding 5 ha per site, in total, over a continuous three-year period	Proposal may require indigenous vegetation clearance exceeding 5 ha. This has been included on a conservative basis noting the Surface Infrastructure Site is located on existing farmland with minimal indigenous	Restricted Discretionary

Rule	Rule Summary	Project Activity	Activity Status
------	--------------	------------------	-----------------

vegetation cover. It is acknowledged two access portals, laydown areas, road diversion and new access roads are required throughout the Project Site which may exceed a total 5 ha of vegetation clearance.

Part 6 Infrastructure, Services, and Other Activities District Wide

Rule 6.4.2.2	All electric lines and telecommunication lines which are not permitted activities and any associated above ground network utility or structure.	The proposal includes new above ground electricity lines to service the Project which are not provided for under permitted Rule 6.2.5	Discretionary
Rule 6.4.2.4.	Electricity substations.	The proposal may include a new substation or switchyard to service the surface infrastructure and underground mine.	Discretionary
Rule 6.4.2.8.	Meteorological service facilities.	The Project includes the establishment and use of a weather station and associated meteorological masts for monitoring purposes.	Discretionary
Rule 6.4.2.6.	New roads and associated facilities including retaining walls, culverts, bridges and traffic signs and control devices on legal road.	Soldiers Big River Road is proposed to be rerouted and re constructed.	Discretionary
Rule 6.4.2.7	Activities involving hazardous substances which do not meet all the performance standards for controlled activities.	Liquid hazardous substances will be stored in accordance with best practice, however, refuelling areas may be unsealed, and in-situ refuelling	Discretionary

Rule	Rule Summary	Project Activity	Activity Status
------	--------------	------------------	-----------------

of mining machinery may occur.

Part 7 District Wide Rules

Rule 7.4.1.2	Activities having frontage or access to a strategic route which is a State Highway (as listed in Part 12) shall comply with the following standards...Where the activity does not comply with the performance criteria in Table 7.1(a) or Table 7.1(b) or, the activity generates more than 60 vehicle movements per day, the activity will be assessed as a limited discretionary activity.	During operation the Auld Creek Project is anticipated to generate over 80 vehicle movements per day for staff travel alone as discussed by Stantec (2026).	Restricted Discretionary
Rule 7.7.7.1	Up to a maximum of 3 signs per site, provided the combined area does not exceed 3m ² , the sign relates to the activity on site.	The Project will likely require more than 1 sign.	Discretionary

Te Tai o Poutini Plan

Part 2 – District Wide Matters

INF - R7 (Under Appeal)	New Lines, Telecommunication Poles or Towers located in the General Rule or Industrial Zones.	It is likely the proposal will require new overhead electricity lines across the Open Space Zone to service the portal and adit on DOC land.	Discretionary
TRN - R10	Formation of unformed legal road not meeting Permitted Activity standards	The proposal includes the possible formation and extension of Quigleys Road an unformed legal road outside of a designation under this TTP.	Restricted Discretionary

Rule	Rule Summary	Project Activity	Activity Status
TRN - R15	Formation of a new Transport Corridor not undertaken by a requiring authority in accordance with a designation.	Soldiers Big River Road is to be re-routed along the southern side of the valley adjacent to Devil Creek to avoid the Project Site.	Discretionary
ECO - R10 (Under Appeal)	Indigenous vegetation clearance not meeting Permitted, Controlled or Restricted Discretionary Rules	Vegetation clearance is likely to exceed or 5000 m3 and 25m ² per linear 200 m length of riparian margin.	Discretionary
NC - R4 (Under Appeal)	Earthworks within the Riparian Margin of a River, Lake or Wetland not meeting the Permitted Activity Rules	The proposal is likely to exceed 25 m ³ per 200m length of riparian margin for the construction of required river crossing and new legal road formation.	Discretionary
EW - R7	Earthworks in any Zone not meeting Permitted Activity standards (where these are not located in Overlay Chapter Areas). NB: Permitted activity standards are under appeal.	The required earthworks for the formation of unformatted legal roads and diversion of Soldiers-Big River Road will likely exceed a depth of 1.5m.	Restricted Discretionary
Part 3 – Area Specific Matters			
OSZ - R19	Mineral Extraction Activities in the Open Space Zone	Proposal includes Mineral Extraction within the Open Space Zone (Mine Site)	Discretionary
GRUZ - R25 (Under Appeal)	Mineral Extraction Activities not meeting Permitted Activity Standards	The proposal will exceed the permitted condition 1. Regarding the volume of material to be excavated in a calendar year exceeding 20,000 m³. The proposal will infringe permitted condition 4(iii) as the activity will occur within a riparian margin of a stream.	Discretionary

Rule	Rule Summary	Project Activity	Activity Status
		Traffic generated is likely to exceed 10 heavy vehicle movements and 30 light vehicle movements per day as permitted under condition 8.	

West Coast Regional Council

Rule	Rule Summary	Project Activity	Activity Status
Regional Land and Water Plan			
Section 8 - Rules for Activities on Land			
Rule 16	Earthworks and vegetation disturbance located outside of a wetland identified in Schedule 1 or 2 which contravenes relevant permitted and controlled activity rules.	> Proposed earthworks located within a riparian margin likely to exceed 25 m² (permitted under Rule 2) > Proposed earthworks located outside a riparian margin on land with a slope greater than 12 degrees (Erosion Prone Areas 1 and 2) are likely to exceed 500 m³ (permitted under Rule 4). > Proposed vegetation Removal in riparian margins results in non-compliance under Rules 8 and 9.	Discretionary
Section 9 – Rules for Lake and Riverbed Activities			
Rule 35	To erect a structure on, in or under, excavate, drill, tunnel or disturb the bed of a river or lake outside of a wetland identified in Schedule 1 or 2 which contravenes relevant	> The proposal may include a structure for damming water under Rule 35, it is likely the upstream catchment will exceed 50	Discretionary

Rule	Rule Summary	Project Activity	Activity Status
	permitted and controlled activity rules.	ha (permitted under Rule 24). > Depending on the chosen access route option, it is possible the required culvert will exceed 5 m in width resulting in a non-compliance with condition (a) of Rule 23	

Section 10 – Rules for the Take, Uses and Diversion of Water

Rule 56	Other takes and uses of groundwater unless permitted by Rules 44, 45, or 46, or controlled by Rule 52.	Proposed take of groundwater will exceed a maximum volume of 50,000 litres per day as permitted under Rule 44.	Restricted Discretionary
Rule 57	Other takes and uses of surface water unless provided for by Rules 39, 40, 42, 43 49, 50 or 55.	Proposed surface water takes will exceed the permitted 2 L/s and maximum volume of 25,00 L per day under Rule 40 and proposed allocated flow may be less than 20% of MALF under Rule 57.	Discretionary
Rule 58	Other diversion activities unless permitted by Rules 47, 48, 49, 51, or controlled by Rule 54.	Diversion of stormwater runoff – contaminated and uncontaminated.	Discretionary
Rule 59	Other damming activities unless permitted by Rule 50.	Devis Creek may have an upstream catchment over 50 ha and water depth exceeding 3 m and therefore may not meet permitted conditions under Rule 50.	Discretionary

Section 11 – Discharge to Water Rules

Rule 71	Discharge surface water, groundwater and contaminants to land in	It is anticipated that with the appropriate management practices in place, including an	Discretionary
---------	--	---	----------------------

Rule	Rule Summary	Project Activity	Activity Status
------	--------------	------------------	-----------------

circumstances that will result in that water and contaminant entering water not complying with 63, 64, 65, 66, 67, 68, 69 or 70.

Erosion and Sediment Control Plan (“**ESCP**”), discharging sediment to water will be avoided beyond what is permitted. However, as the Project involves activities near waterways, resource consent is sought to discharge sediment to surface water during construction activities.

Section 12 – Discharge to Land Rules

Rule 91	Any discharge of contaminants into or onto land not covered under permitted and controlled rules.	> The proposed discharge of clean fill is likely to exceed an annual volume of 5000 m³ as permitted under Rule 86. > It is likely clean fill may be discharged to land within riparian margins and on land within the Erosion Prone Areas 1 and 2. > Proposed On-site sewage effluent discharge to land is likely to exceed 2000 L per day⁵⁰ as permitted under Rule 79.	Discretionary
---------	---	---	----------------------

Regional Air Quality Plan

Rule 16	Discharge heat and other contaminants to air from stockpiling and mining processes.	It is considered likely dust emissions will extend beyond the property site boundary therefore not meeting permitted activity conditions under Rules and required	Discretionary
---------	---	---	----------------------

⁵⁰ Note 1 under Rule 79 states “The volumes stated in condition (a) are equivalent to the amount of effluent produced by approximately 10 people”

Rule	Rule Summary	Project Activity	Activity Status
------	--------------	------------------	-----------------

consent as a Discretionary
Activity under Rule 16.

National Environmental Standards for Freshwater

Rule	Rule Summary	Project Activity	Activity Status
------	--------------	------------------	-----------------

Regulation 45D	> Vegetation clearance within, or within a 10 m setback from a natural inland wetland; > Earthworks or land disturbance within, or within a 10 m setback from, a natural inland wetland; > Earthworks or land disturbance outside a 10 m, but within a 100 m, setback from a natural inland wetland; > The taking, use, damming, or diversion of water within, or within a 100 m setback from, a natural inland wetland; and > The discharge of water into water within, or within a 100 m setback from, a natural inland wetland.	The proposed mining activity may require vegetation clearance, earthworks and possible land disturbance within a wetland for the construction and operation of surface infrastructure, access portal and ventilation shafts.	Discretionary
-------------------	---	--	----------------------

Regulation 71	The placement, use, alteration, extension of reconstruction of a culvert in, on, over or under the bed of a river that does not comply with the permitted activity	It is possible that proposed culvert crossings may be designed to impede the passage of exotic fish to protect the upstream indigenous fish populations, in	Discretionary
------------------	--	---	----------------------

Rule	Rule Summary	Project Activity	Activity Status
	conditions of regulation 70(2).	accordance with the policy direction of the National Policy Statement for Freshwater Management 2020. This will be confirmed following further freshwater ecology surveys that will be completed, however, as a precaution, approval for this activity is being included in this application.	

National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health

Rule	Rule Summary	Project Activity	Activity Status
Regulation 11	This regulation applies to an activity described in any of regulation 5(2) to (6) on a piece of land described in regulation 5(7) or (8) that is not a permitted activity, controlled activity, or restricted discretionary activity.	It is considered possible the site may contain contaminated land as defined under regulation 5(8) due to previous mining activity proposed land disturbance for both construction and mining activities may exceed thresholds described in Regulations, 8, 90 and 10.	Discretionary

National Environmental Standards for Greenhouse Gas Emission from Industrial Process Heat

Rule	Rule Summary	Project Activity	Activity Status
Regulation 9	This regulation applies to the discharge of any greenhouse gas from a device which burns a fossil fuel (other than coal) and is	The Project may utilise carbon regeneration kilns, burners and / or furnaces during the on-site processing of gold ore; these kilns are commonly operated by	Restricted Discretionary

not a back up device and is not on a low emissions site.	burning diesel, heavy oil, natural gas or liquefied petroleum gas.
---	--

3.1.2 Crown Minerals Act 1991

3.1.2.1 Mining Permits

Rua Gold is also seeking relevant Mining Permit and Access Arrangements under the Crown Minerals Act 1991 (“**CMA**”) and associated Crown Minerals (Minerals Other than Petroleum) Regulations 2007 as part of this referral application. Rua Gold holds several NZP&M exploration permits in the Reefton Goldfield, which are relevant to the Auld Creek Project. These are described in Section 2.2.1.2 and included as **Attachment 3** to this application.

As part of the Project that Rua Gold is seeking to be referred, Rua Gold is applying for a Tier 1 mining permit for gold and antimony over approximately 1009 ha of EP60648 (Golden Point) and EP 60747 (Cumberland). The proposed mining permit will cover 659 ha of the Golden Point permit and 350 ha of the Cumberland permit, respectively. These areas of the existing exploration permits will be surrendered. A map of the proposed Mining Permit Area in relation to the exploration permits is included as **Attachment 10** to this application. The proposed mining permit meets the Tier 1 definition under section 2B(b) of the Crown Minerals Act 1991 as a proposed underground mining operation.

This application is supported by 16,436 m of diamond drilling and an additional 19,000 m of diamond drilling being undertaken across the Auld Creek Deposit to confirm the extent of the resource and associated mineralisation. The primary focus of mining activities will be the extraction of gold and antimony.

The proposed Mining Permit Area encompasses the surface infrastructure site and includes additional contingency land to accommodate potential future mining development as the resource and mining operation potentially expand. This approach is intended to minimise the likelihood of requiring further land expansion applications within the foreseeable future. Exploration activities will continue within the Mining Permit Area and surrounding exploration permits.

3.1.2.2 Access Arrangements

Concurrently with the proposed mining permit, Rua Gold will also seek access arrangements from DOC under section 61 of the CMA, which will also be included as part of the intended substantive application. An access arrangement permits access to

conservation land administered by DOC for the mineral related activities in accordance with the mining permit.

Rua Gold currently holds two access arrangements for its exploration operations under the relevant exploration permits. These include access arrangements 93190-AA (Golden Point) and 109859-AA (Cumberland) (included as **Attachment 4** to this referral application). Rua Gold is intending (as part of its substantive application) to augment these existing access arrangements with a new access arrangement for its activities within public conservation land associated with the relevant mining permit, which will be sought as part of its substantive application.

The activities that Rua Gold will seek to authorise under the access arrangement include:

- > Exploratory and Mining drilling activities across approximately 369 ha of conservation land within Victoria Forest Park;
- > The construction, upgrade, and use of existing access tracks to establish a haul road network;
- > The installation and maintenance of a portal access and associated adit;
- > The installation and maintenance of surface ventilation shafts;
- > The installation and maintenance of an underground twin access tunnel and the associated underground Auld Creek Project mining operation;
- > Minimum impact activities (as defined by the Crown Minerals Act);
- > The installation and maintenance of piezometers;
- > The installation and maintenance of surface water pumps for extracting surface water;
- > The installation and maintenance of water flow monitoring stations;
- > The installation and maintenance of rain gauges and a meteorological monitoring station;
- > Low impact surface and groundwater, ecological, noise and vibration monitoring
- > Field Camps within the approved areas under existing access arrangements to support any required field work;
- > Locating portacoms and a portaloo at up to two drill sites at any time, to support environmental monitoring of any required field work;
- > Helicopter access throughout the life of the mine and post-closure period for equipment lifting and personnel access; and

- > The use of drones (or other aerial photography).

It is noted that access arrangements will be required under section 59 of the CMA for access over private land, including the construction of a surface portal and related underground access, and these applications will be processed outside of the FTAA process, as these applications are not provided for under the Act.

3.1.3 Conservation Act 1987

Outside the above access arrangement sought, Rua Gold is seeking the appropriate leases and easement concessions for activities on DOC land that are required outside the mining activities and the associated mining permit area. The following concessions are sought as part of the Project:

- > Monitoring activities may include structures and equipment on DOC land including water monitoring of both downstream of Auld Creek and outside of the mining permit area;
- > Monitoring of wildlife and potential pest traps may be required outside of the mining area, with specific regard to the Alborn Skink – other compensation activities may also occur on DOC land;
- > The Project may require electrical transmission lines across DOC land to power the portal access and mining operation located on the Mine Site;
- > The existing Globe Bike Track will need to be rerouted; this adjusted route may occur outside of the mining permit area; and
- > Use of drones (and other aerial imagery).

3.1.4 Wildlife Act 1953

Approvals are required under the Wildlife Act 1953 for the disturbance of wildlife, including killing, harming, catching, holding and releasing of wildlife regulated by the Wildlife Act 1953.

Rua Gold is seeking wildlife approvals as described in clause 1 of Schedule 7 to the FTAA for any activities relating to the potential disturbance of lizards, birds and potentially terrestrial invertebrates.

This may involve the following:

- > Undertake monitoring of lizards;
- > To handle, salvage and relocate lizards;

- > The incidental injury and / or killing of lizards during their capture/handling or during operational and construction works;
- > To handle, salvage and relocate terrestrial invertebrates;
- > The incidental injury and / or killing of terrestrial invertebrates during their capture/handling or during operational and construction works;
- > The catching and handling of protected bird species;
- > To kill wildlife when unavoidable;
- > The handling of injured protected birds as required for the purposes of seeking veterinary care; and
- > The handling of protected bird carcasses as required for the purposes of necropsy to establish cause of death.

3.1.5 Freshwater Fisheries Regulations 1983

The Project involves constructing culverts within streams. It is noted that culverts are required within the Project Site; it may be necessary to prevent exotic / pest fish from passing through in order to protect the threatened indigenous fish populations upstream, or similarly, the provision of fish passage may not be deemed necessary due to low flow path, or shallow seabeds. Additionally, fish salvage activities may be required during the construction of culverts and any associated modification of streams. The FTAA includes specific approvals for complex freshwater fisheries activities that would otherwise be granted under the Freshwater Fisheries Regulations.

At this stage, it is assumed that Rua Gold will need to apply for approval for the proposed culverts under this regulation or seek an appropriate dispensation under section 42 or 43 of the Freshwater Fisheries Regulations 1983.

3.1.6 Other Approvals

It is noted that several additional approvals are required to facilitate the Project and are outside the FTAA process, as they are not provided for under the Act. These approvals are detailed below for completeness. Notwithstanding, such approvals are not uncommon for large-scale projects, and there are efficient systems in place to ensure that obtaining these permits or undertaking the works will not impede the overall efficient and effective delivery of the Project.

- > The Project requires access arrangements over approximately 548 ha of non-Crown land under section 60 of the CMA;

- > Road stopping will be required for the existing legal paper road which run through the Surface Infrastructure Site, this process will occur under either the Public Works Act 1981 or the Local Government Act 1974;
- > The required intersection upgrades along State Highway 7 will require a Corridor Access Approval and other related traffic management approval from NZTA;
- > The Project includes the realignment of Soldiers Big-River Road, it is anticipated this work will require separate approvals from NZTA associated with both the construction of the realigned road and associated road closure; and
- > Building consents for building work associated with the Project under the Building Act 2004.

3.2 STAGING OF THE PROJECT

Construction of the Project is anticipated to take between 12 and 18 months (estimated between 2027 to 2028) and is not proposed to be staged or staggered in any way (i.e. all surface and mining infrastructure and will be constructed within this timeframe).

Production of the mining operation is proposed toward the end of 2028 and will be operational for an estimated six to eight years. Closure of the mine is estimated to take an additional three to five years or until rehabilitation criteria are met and agreed by regulators and Iwi. Post-land use of the areas occupied by infrastructure is expected to be forestry and agriculture.

3.3 ALTERNATE PROJECT

The Project is not proposed as an alternative project

3.4 ADVERSE EFFECTS

3.4.1 Description of Adverse Effects and their Significance

3.4.1.1 Cultural Effects

It is acknowledged that it is for the mana whenua of the area to determine and assess the cultural effects of the proposal. However, to the extent that cultural values may align with water quality and ecological effects, addressing these matters will, to some degree, also avoid, remedy or mitigate cultural effects.

Rua Gold has engaged with Te Rūnanga o Ngāti Waewae regarding this proposal and have indicated support for the Project as outlined within the letter of support included in **Attachment 13** to this application. Additionally, Ngāi Tahu have been engaged and refers to

Ngāti Waewae to ensure mana whenua views are incorporated in the Project (refer to the letter of support included in **Attachment 13** to this application). On this basis, the anticipated cultural effects are anticipated to be of low significance.

Te Rūnanga o Ngāti Waewae sought assurance regarding Rua Gold's rehabilitation and closure strategy and requested to be actively engaged and consulted on the closure approach and objectives to ensure that Ngāti Waewae values are realised. In response, Rua Gold has developed an initial Closure and Rehabilitation Management Strategy for the purposes of this referral application. Te Rūnanga o Ngāti Waewae has been actively consulted in the development of this strategy and will continue to be throughout the Project.

Rua Gold will continue to undertake meaningful consultation with Te Rūnanga o Ngāti Waewae to ensure mana whenua values are effectively incorporated into the Project including the proposed rehabilitation throughout the substantive design and consenting stages.

3.4.1.2 Landscape, Visual Amenity and Natural Character Effects

Rua Gold has engaged Wayfinder (2026) to identify the effect the Project may have on the recreation, landscape and visual amenity values of the surrounding area. This assessment was informed by a site and locality visit undertaken via helicopter in January 2026. This assessment is included as **Attachment 14** to this application.

The surrounding landscape for the Project includes the Victoria Park Forest, which is described as a continuous steep forest representative of West Coast environments. The surrounding farmland, where the processing plant will be located, is flanked by steep ridgelines of the Victoria Park Forest. Wayfinder recognises that the perceptual and associative landscape is heavily influenced by mining, as Reefton is historically one of New Zealand's most notable gold mining districts.

Wayfinder identified the following components of the Auld Creek Project, which could have the most influential effect on recreation, landscape and natural character within the area:

- > Effects from the mine portal and ROM upper haul road;
- > Restricted access to the public Globe Hill bike track;
- > Visual effects of haul roads and transport between the mine portal access and the processing site;
- > Landscape effects from the processing plant and surface infrastructure; and
- > Natural character effects on small, modified wetlands.

Wayfinder (2026) considers the most prominent landscape effects to be generated from the processing plant located on pastureland, noting the size and scale of the plant and location near a public road. However, the level of effect associated with this is anticipated to be low to low-moderate considering the small number of surrounding dwellings. All other effects identified were in the range of low to very low, considering the high level of vegetation cover and use of existing access tracks most of the mine components are considered to present very low to low effects. Additionally, Wayfinder note that the existing landscape for the Project is already largely modified as farmland and therefore, any natural character effects are anticipated to be low, with majority of the Victoria Forest Park remaining undisturbed due to the underground nature of the mine.

Wayfinder considered that the landscape, visual, and natural character effects of the Project will be low and can be effectively mitigated by vegetation cover or artificial screening to reduce the visibility of vehicle movements, by managing the timing of vehicle movements, and by dust and noise controls.

Overall, Wayfinder conclude the Project will have minor adverse visual and natural character effects, which can be effectively mitigated through design and operational control measures.

3.4.1.3 Acoustic and Vibration Effects

Both the construction and operation of the Project will potentially generate noise outside of the Project Site. A preliminary acoustics and air quality assessment has been prepared by Tonkin and Taylor (2026) and is included as **Attachment 15** to this application.

Tonkin and Taylor identified two sensitive receptors in the Project's immediate vicinity. The closest dwelling is located approximately 700 meters to the north at 196 Soldiers-Big River Road, while a second dwelling is situated about 55 meters to the west of the project's main access intersection between SH7 and Quigleys Road, at 2484 Ikamatua Highway.

Additionally, Tonkin and Taylor note that the Reefton township is located 1.7 kilometres to the north, and recreational areas within Victoria Forest Park are also considered sensitive receptors.

The key noise and vibration sources identified include:

- > Construction Phase:
 - > Site establishment and earthworks, including road construction;
 - > Portal excavation and tunnelling activities;

- > Construction of surface infrastructure including workshops, offices, and laydown pads;
- > Use of heavy machinery, piling, drilling, and (if applicable) controlled blasting for construction purposes; and
- > Construction traffic along local road corridors;
- > Operational Phase:
 - > Above ground mobile equipment (load-haul-dump units, drills);
 - > Fixed surface infrastructure such as ventilation fans, compressors, pumps, and generators;
 - > Crushers, screens, and stockpile management systems associated with the processing plant;
 - > Vehicle movements (light and heavy vehicles) within the site;
 - > Product haulage to offsite locations;
 - > Staff vehicle movements;
 - > Maintenance and loading activities; and
 - > Blasting.

Tonkin and Taylor note there is a significant spatial separation between the sources of construction noise, which ensures effects will be less than minor. Additionally, aside from blasting, construction vibration effects will be less than minor and only noticeable within 30 m of the site, ensuring less than minor to minor effects. Blasting effects (during tunnel development and mining operations) include vibration and air blast overpressure; these may be perceptible to sensitive receptors surrounding the Project. Tonkin and Taylor note that further vibration assessment will be required for both human receivers and ecological habitats, and outline that a vibration mitigation management plan may be required to control blasting timing, set blast design parameters and outline a comprehensive vibration monitoring programme. This management plan will ensure compliance with relevant standards and ensure low adverse effects. Construction mitigation measures to further reduce any adverse effects include managing high-noise construction during daytime hours.

During operation, Tonkin and Taylor note that, similar to construction, the separation of the Project from surrounding receptors provides an adequate buffer and will likely ensure low effects and / or compliance with relevant standards. Acoustic and Vibration effects on ecology are yet to be determined however likely to be low based on their experience with similar projects. Key operational effects will be night movements along the access routes

via Quigleys Road, and the dwelling located near SH7, these effects and required mitigation will be discussed further during detailed assessment.

Practical mitigation measures identified for implementation during operation include strategically locating primary surface infrastructure to utilise the topography as a natural noise barrier and constructing the WRS in a location that acts as a noise barrier. Further management of traffic movement during operation and selective implementation of machinery that prioritises low-noise plant design.

3.4.1.4 Air Quality Effects

As noted above, Tonkin and Taylor assessed the potential effects on Air Quality (included as **Attachment 15** to this application). Both construction and operation of the Project have the potential to generate adverse effects on air quality (namely dust).

With regards to effects on Air Quality, the key sources identified include:

- > Construction Phase:
 - > Site establishment and earthworks, including road construction;
 - > Portal excavation and tunnelling activities;
 - > Use of heavy machinery, piling, drilling, and (if applicable) controlled blasting for construction purposes; and
 - > Construction traffic along local unpaved road corridors;
- > Operational Phase:
 - > Mobile equipment operating above ground (load-haul-dump units, drills) over unpaved surfaces;
 - > Mine portal vents, where dust generated underground may be vented to air;
 - > Crushers, screens, and stockpile management systems within the portal area;
 - > Vehicle movements over unpaved surfaces and within the site;
 - > Product haulage to offsite locations along unpaved haul routes;
 - > Staff vehicle movements along unpaved haul routes; and
 - > Waste rock stockpiling (which is understood to occur to the immediate north of surface infrastructure).

Tonkin and Taylor note the following standard practice air discharge mitigation measures include:

- > The use of a water cart or fixed spray system for frequently trafficked unpaved areas of the site to suppress dust emissions;
- > The use of water sprays on the primary crushers;
- > The use of water sprays on any dry stockpiles;
- > Minimising vehicle speeds on unpaved surfaces;
- > Maintaining unpaved surfaces so that they are free of corrugations and potholes; and
- > Minimising drop heights from loaders and excavators.

The above measures are considered effective in mitigating adverse air quality effects. Given the significant spatial separation from receptors, the effects of dust during construction and operation are expected to be minimal. Combustion emissions will occur from construction activities; however, potential effects are expected to be negligible due to the separation between the receiving environments.

Overall, given the spatial separation of sensitive receptors and with best practice mitigation measures implemented, Tonkin and Taylor conclude the Project is expected to have less than minor adverse acoustic and air quality effects during both construction and operation.

3.4.1.5 Geotechnical Effects

Rua Gold will undertake extensive geotechnical investigations into each component of the Auld Creek Project. Key geotechnical risks include stability and safety of surface slopes with specific regard to the WRS design, near-surface mining during phase one and the development of the adit, and underground elements, including the access portals, twin access tunnels and the underground mine.

An extensive drilling programme has been undertaken during the exploration phase of the Project, resulting in a comprehensive geotechnical dataset. This data has provided a robust geological model used to inform the preliminary conceptual approach to the underground mine design. Rua Gold will refine and adapt this preliminary conceptual approach as the design of the underground mine progresses, and as a more detailed understanding of ground conditions is developed. This will include collecting and analysing additional rock mass characterisation data.

Terra Firma (2026) have provided a Safety-Critical Roles and Ground Pre-Conditioning Memorandum included as **Attachment 16** to this application. Terra Firma note underground geotechnical conditions are anticipated to be challenging, particularly when mining close to surface (particularly critical for phase one of the Project).

Terra Firma notes the following key geotechnical risks in regard to phase one and near surface mining:

- > Ground relaxation and loosening of near surface rock mass;
- > Unravelling of structurally controlled reef, alteration zones and weathered Greenland group host rock;
- > Hydraulic connectivity between surface and underground workings; and
- > Surface subsidence or localised collapse.

To effectively address these risks, a structured ground preconditioning programme will be prepared which will seek to improve rock mass cohesion, reduce permeability and risk of surface subsidence. Proposed precondition includes:

- > **Cementitious Grouting:** a cement grout designed to penetrate fine fractures and permeable rock mass; and
- > **Resin injections:** A resin system suitable for sealing active water inflows and highly fractured zones. Resin injections will further be used to create a crown pillar and ensure stability of the ground above, allowing underground mining to continue.

The preconditioning programme and near surface mining will be closely measured and controlled through monitoring of:

Injection pressure

- > Resin or grout volumes and take;
- > Flow rates;
- > Injection durations; and
- > Observed ground and water responses.

Any adverse stability effects of the WRS will be avoided and mitigated through:

- > Closely monitoring and supervising the construction of the WRS with appropriately experienced expertise;
- > Ensuring the design prepared by a suitable expert is site specific and considers all relevant geotechnical parameters in accordance with best practice;
- > Including appropriate detailing of drains and monitoring of groundwater levels; and
- > Preparing erosion and sediment control plans for the works.

As noted, a comprehensive geotechnical investigation will be prepared and continuously updated and amended throughout the design, construction and operation of the Project to ensure the mining operation addresses and appropriately avoids any potential adverse effects in accordance with required health and safety standards.

3.4.1.6 Contaminated Land Management

It is noted that the proposal is located in the Reefion Goldfield, which has a rich mining history. Such mining activities commonly involve the use of hazardous substances, which may be listed on the Hazardous Activities and Industries List (“**HAIL**”). In other parts of the site, farming and other land use activities may also have utilised hazardous materials.

Green Road (2026) have been engaged to provide a suite of assessments and reports to support the comprehensive assessment of geoenvironmental hazards and potential effects of the Project. A summary of these reports is included as **Attachment 17** to this application. In order to determine potential ground contamination a Preliminary Site Investigation (“**PSI**”) will be prepared by Green Road. The PSI will identify pre-existing contamination sources and ensure future potential disturbance of the land can be undertaken in a manner that does not pose a risk to human health and / or ecological receptors.

Any contaminated soils and areas identified by the PSI will be appropriately documented to inform effective remediation and site management works, ensuring that any associated contamination risks to human health are avoided.

3.4.1.7 Hazardous Substances (Storage and Use) Effects

It is noted that the Project will require the use, handling, storage and discharge of hazardous substances, possibly including cyanide, lead nitrate, sulfuric acid and mercury. These chemicals are required throughout the processing operations within the Surface Infrastructure Site. Additionally, it is noted that handling and storage will be required of potentially acid-forming rock, including tailings or waste rock, which contains high traces of sulphides and becomes highly acidic when exposed to oxygen. The Project will adopt all recommendations made by geochemical specialists and all hazardous substances will be stored in accordance with best practice guidance and methods, including the design and construction of an appropriate dry tailing storage facility and WRS. Storage of hazardous substances will be in appropriate locations effectively separated from sensitive activities both external to the site and within the Project Site. Substances will be kept in applicable storage facilities as designed by applicable specialists. Rua Gold will ensure all use, handling and storage of hazardous substances occurs in strict accordance with the recommendations provided by Green Road as the relevant specialists.

Overall, it is considered the storage, discharge and use of hazardous substances will be effectively managed to avoid and minimise any adverse effects.

3.4.1.8 Terrestrial Ecological Effects

Rua Gold has engaged Ecological Solutions (2026) to prepare an Ecological Technical Memorandum to assess the terrestrial and aquatic ecological effects of the Project. This assessment is included as **Attachment 18** to this application. The assessment has been informed by both a site walkover undertaken in January 2026 and a desktop assessment of existing data. It is noted that the effects management hierarchy will be implemented to address any potential or actual effects on both terrestrial and aquatic ecology, in accordance with the relevant policy direction, as discussed above.

The Project Site is situated in both the Totara and Reefton ecological districts. Ecological Solutions notes that the Victoria Park Forest comprises largely unmodified vegetation, with the surface infrastructure site located on the valley floor of Devis Creek, which includes modified exotic pasture and common weeds. Ecological Solutions has identified that the Project Site has the following habitat:

- > **Avifauna:** 55 species of birds within 10 km of the Project Area were identified via desktop. Thirteen of these species are of conservation concern. Of these species, Falcon, Kākā, Kea, South Island Robin, and Cyanoramphus Parakeet may be in the area, as they are forest species that utilise mature indigenous vegetation for foraging, roosting and breeding. It is noted that Great Spotted Kiwi are not expected as Project area is outside of their known range;
- > **Lizards:** Three lizards of conservation concern have been identified within 15 km of the Project Area. Species include Forest gecko, Nelson green gecko, and Alborn skink. An additional two skink species have also been identified in the vicinity, the Westport skink and the northern grass skink; and
- > **Bats:** Based on the reviewed literature to date, Ecological Solutions notes it is highly unlikely bats are present within the Project Area and surrounding environment. It is noted that bat monitoring surveys have been carried out as part of exploration activities within the current permit areas with no bat activity detected to date.

With regard to effects on the terrestrial ecology, Ecological Solutions notes the following possible effects:

- > Loss of botanical values from vegetation removal for mine portal construction, roading upgrades and ventilation shafts;
- > Direct effects (injury or mortality) on fauna from vegetation removal;

- > Indirect effects (loss of habitat) on fauna from vegetation removal; and
- > Introduction of weed or pest species.

The design of the mining operation, which primarily focuses on an underground solution, aims to significantly reduce and avoid adverse effects on ecological values. However, where there is loss, Rua Gold will seek to ensure this is addressed through appropriate mitigation and compensation or offsetting measures, as set out in the National Policy Statement for Indigenous Biodiversity. Moreover, the direct and indirect effects outlined above will be managed through species-specific Management Plans and Weed Management Plans. It is also noted that a Wildlife Act Authority will be sought as part of the substantive application and for the handling, capture and relocation of Lizards. Best practices in accordance with the Wildlife Act and DOC protocols will be implemented where practicable, including scheduling works around breeding seasons and avoiding tree felling near active roosts.

Overall, Ecological Solutions considers anticipated and known effects on terrestrial ecology from the Project are largely avoided due to the small-scale disturbance footprint, and where such effects do arise, they are likely to be effectively managed.

3.4.1.9 Aquatic Ecological Effects

As noted above, Ecological Solutions has undertaken an assessment of aquatic ecology effects in relation to the Project (included as **Attachment 18** to this application).

The Project is located within the Inangahua River catchment, with the Surface Infrastructure Site located in the Devils Creek sub-catchment. Additional relevant sub-catchments include Auld Creek and Soldiers Creek. Devils Creek originates below the disused Alborn Mine and becomes a medium-sized stream below its confluence with Carton Creek. A number of small, modified tributaries of Devils Creek are within the Surface Infrastructure Site. These tributaries lack riparian vegetation and are open to grazing livestock.

Devils Creek has been regularly monitored over the last 20 years due to the development and operation of the Globe Progress Mine located south of the Project. This data provides a robust baseline and water monitoring has been continued by Rua Gold. The baseline water quality for Devils, Auld and Soldiers Creek is high, with waters characterised by a near-neutral pH, low alkalinity and hardness, and low nutrient and metal / metalloid concentrations.

Additionally, it is acknowledged the presence of wetlands is possible across the Project Site.

Ecological Solutions has identified the following aquatic ecological values within the Project Site:

- > 'Good' to 'Excellent' in-stream and riparian habitat to support diverse benthic invertebrates at Devils Creek;
- > 'Good' water and habitat quality for Macroinvertebrate communities; and
- > Devils Creek is habitat to the longfin eel, redfin bully, and upland bully, as well as the introduced brown trout. The Devils Creek fish community has been characterised by low diversity and abundance throughout the last 20 years.

With regard to effects on the aquatic ecology, Ecological Solutions notes the following possible effects:

- > Loss and/or alterations to the hydrology of highly modified wetlands (if present in farmland) due to the construction of infrastructure;
- > Alterations to the hydrology of natural inland wetlands located within indigenous vegetation as a result of constructing the vertical shaft and/ or ventilation openings along the tunnel. These effects due to unmanaged groundwater drawdown could remove natural inland wetlands or reduce their extent and values;
- > Potential adverse effects on water quality due to sediment mobilisation and/or contaminant discharges and/or dust during earthworks and construction of infrastructure;
- > Required surface water takes;
- > The development of the processing plant and unmanaged treated wastewater discharges has the potential to adversely affect the water quality and ecological health of Devils Creek and the Inangahua River; and
- > The upgrading of Soldiers Big-River Road and / or other roads is expected to involve replacing a number of stream culverts that would need to be managed so as to maintain fish passage.

With respect to effects on aquatic ecology, Ecological Solutions notes the implementation of Aquatic Ecology Management Plans will effectively address fish salvage and transfer during the modification of streams and installation of culverts. A fish screen will be installed around water take-in structures in accordance with best practice to avoid adverse effects on aquatic ecology. Additionally, water allocation limits proposed will consider the health and well-being of Devils Creek aquatic ecology to avoid and minimise any adverse effects. Additionally, proposed culverts will be constructed in accordance with best practice with fish passage provided for where possible. Best practice erosion and sediment controls, and wastewater and stormwater management plans will minimise the adverse effects on water

quality and aquatic habitat. Best practice includes passive and active treatment systems for both wastewater and stormwater.

Overall, Ecological Solutions considers anticipated and known effects on aquatic ecology from the Project can be effectively managed and will be of generally low significance.

3.4.1.10 Surface Water Quality Effects

Effects on surrounding water bodies and water quality resulting from the Project are a key consideration. The discharge of mine-impacted waters (both during mine operation and long-term closure) will likely be directly into Devils Creek. However, it is noted that discharge to Devils Creek will occur only after the water has been suitably treated and the discharge quality meets the relevant receiving-water quality standards.

Rua Gold acknowledges that water quality standards are essential for maintaining water quality and, in turn, the ecological health of the Devils Creek catchment. Although the catchment has been modified by historic and contemporary mining activities (e.g. Globe Process Mine), Ecological Solutions observes that the water quality and associated ecological values of Devils Creek remain high and stable. The Project use appropriate on-site water management to ensure that it does not substantially affect this water quality and associated ecological values.

Green Road (2026) will provide a suite of reporting that will assess and inform the design of the Water treatment system (included as **Attachment 17** to this application). The water treatment system during mine operation is likely to be an active treatment system.

However, Green Road notes that the extent of the operational water management/treatment will be further assessed once a water and load balance model has been developed. Active and passive water treatment systems for rehabilitation and closure of the site will also be investigated.

The water load balance model is imperative for effective and successful water management, treatment, and planning, with a key objective of setting water quality parameters and forecasting water quality at downstream locations.

The water load balance model will include:

- > Development of a conceptual site model, based on the agreed mine plan, which will provide a framework for understanding the hydrological and water quality at the Project;
- > Contaminant load model;
- > Representation of relevant mine water management infrastructure, such as water treatment plant, passive treatment systems;

- > Inputs from other tasks where relevant, including groundwater studies, source term report and cover assessment studies; and
- > Simulation of current, operations, and closure/post closure conditions.

Green Road will adopt an integrated approach to assessing all Project and related water components to comprehensively evaluate site hydrology and associated water treatment design. Furthermore, water quality objectives and modelling will consider the cumulative effects influenced by historic discharges and active mine closure projects, for example, the Globe Progress Mine which discharges into the Devils creek catchment above the proposed Auld Creek project infrastructure and water draw points.

This approach will ensure that all mine-impacted waters are effectively captured, appropriately treated, and discharged in a controlled manner, thereby avoiding or mitigating any potential adverse effects on the surface water quality of Devils Creek so that they are of low significance.

3.4.1.11 Groundwater Quality Effects

The project has the potential to impact groundwater quality through:

- > Infiltration of WRS seepage into groundwater (acid mine drainage); and
- > Potential infiltration of untreated water via water treatment systems.

The effects of the groundwater quality will be assessed by reporting from Green Road (2026). Extensive testing and research on geoenvironmental hazards to determine the acidity generating potential and geochemical properties of waste rock and tailings (mine waste) will be provided to ensure appropriate and effective measures are put in place to manage associated effects. A groundwater characterisation programme will be established to then conceptualise and understand the hydrogeological setting. A comprehensive groundwater technical assessment report will quantify potential seepage losses from the mine waste locations on site and the discharge to Devils Creek.

As noted above, Rua Gold will adopt an integrated approach to the treatment and assessment of mine-impacted waters, ensuring that the potential contribution of contaminants to groundwater is taken into account in the water quality limits for Devils Creek, the ultimate receiving environment. The significance of effects on groundwater quality after treatment and mitigation is low.

3.4.1.12 Water Quantity Effects

The following effects are considered relevant to the Project in terms of water quantity:

- > Low flow effects from required surface water takes (e.g. water carts for dust suppression mitigation);
- > Low flow effects from groundwater dewatering during construction and operation of the underground mine; and
- > Increased hardstand and impervious area have the potential to increase stormwater runoff flows.

With regards to the construction and operation of the access tunnels and underground mine, groundwater quantity and associated adverse effects will be informed by the groundwater characterisation programme and technical assessment prepared by Green Road (2026). The primary objective of the groundwater modelling is to quantify dewatering volumes and assess the potential effects of dewatering on nearby surface water bodies (i.e., stream depletion). The model will quantitatively assess potential groundwater effects arising from the Project and appropriately inform dewatering and groundwater take to avoid or minimise any adverse effects.

Surface water take limits will be designed to ensure that impacts on Devils Creek and the wider catchment are less than minor. Assessment of the proposed water takes will include existing takes in the catchment to avoid over-allocation; however, considering the 'wet' climate of Reefton and the West Coast, over-allocation is not anticipated to be a barrier to this Project accessing a suitable and sustainable water resource. Again, an integrated approach with regards to groundwater take and dewatering will be considered based on modelling results to ensure the health of surrounding water bodies is maintained.

The formation of hardstand, haul roads, and the creation of the WRS has the potential to increase the stormwater runoff flows, and result in an increase in the peak flows leaving the mine site. Influence of the Project and related increase in stormwater runoff on Devils Creek and the wider catchment will be considered during substantive design with effective engineering solutions incorporated to ensure less than minor effects.

The overall potential effect on water quantity is assessed to be low to negligible.

3.4.1.13 Heritage

Southern Archaeology Limited has undertaken three archaeological assessments covering all drill pad locations within the Project Site (associated with the Golden Point EP60648). Southern Archaeology undertook site visits in 2022, 2023, and 2025 to assess all drill pad locations and their immediate surrounds. These assessments were carried out as the exploration programme evolved and expanded, including where drill sites were relocated or newly established

During the three separate site visits, only three drill sites were found to have archaeological evidence in the vicinity, comprising of two small prospect trenches and the Bonanza Mine. These features are recorded as named archaeological sites, identified as L30/178, L30/179 and L30/180 respectively, and are representative of the last known historic mining operations within Auld Creek. A map of the archaeological features in relation to drill sites is included at **Attachment 19** to this application.

Throughout the exploration programme, no Archaeological Authority has been required, as it was determined that no archaeological / historic evidence would be directly affected during the works. An Archaeological Authority is therefore not being sought at this time for this Project.

An Accidental Discovery Protocol will be in place for all operations in the area, as subsurface archaeological evidence that is not initially visible may be encountered. During the proposed development, every practical effort will be made to avoid damage to any archaeological site if one is discovered. In accordance with the existing consent conditions, if any previously unidentified archaeological sites or Māori material are discovered during the proposed development, works will cease around the vicinity of the discovery and Heritage New Zealand Pouhere Taonga and mana whenua will be contacted immediately.

3.4.1.14 Traffic Effects

As noted above, Stantec (2026) have been engaged to conduct a Site Access Options Assessment included as **Attachment 7** to this application and a more detailed assessment of the effects of the Project on the receiving traffic environment as part of the substantive application. The assessment will address the key transport components of the Project, including access options and the rerouting of Soldiers-Big River Road.

Stantec (2026) identified that access to the Project Site via Soldiers Big River Road would result in adverse effects of the existing established activities located along Soldiers Big River Road, further north of the Project Site. Therefore, the Project has adopted access to the Project Site via Quigleys Road. This site access option will ensure it reduces adverse effects on existing uses, with less disruption to the public road network for required upgrades, as Quigleys' access is via a private forestry road. The intersection with SH7 to the north provides a straight alignment with extended sightlines for traffic both entering and exiting the access route. Infrastructure upgrades, including seal widening, road markings and relocation or undergrounding of power poles, are required to accommodate heavy vehicle movements. It is noted a dwelling is located near the site access intersection at SH7, to ensure effects are appropriately avoided, the road will be sealed to minimise noise and dust effects.

The final access route to the Project site is undermined and will require effective coordination across multiple disciplines to ensure impacts on watercourses, vegetation, and ecology are managed. Overall, it is considered access to the Project Site will result in less than minor effects and can be effectively managed.

It is noted Soldiers Big River Road follows an alignment through the proposed location of the mine's surface infrastructure; it is proposed that the road is re-aligned around the western side of the surface infrastructure site to prevent public access to the surface infrastructure site and avoid the potential for conflict with any mine vehicles. The proposed deviation of approximately 1 km will increase journey lengths by about 300 m and journey times by about 40 s. Stantec notes this level of change would not be noticeable to drivers using the road to access destinations such as the Alborn's Track car park.

The volume of movement during both the construction and operation phase can be accommodated by the existing road network, bus services will be provided for mining staff during operational phases to reduce congestion and vehicle movements during the operational phase.

Overall Stantec (2026) consider anticipated and known adverse effects on the transport network can be effectively managed and supported.

3.4.1.15 Rehabilitation and Closure

A comprehensive and integrated rehabilitation and closure concept is proposed for the Auld Creek Project. The details of the proposed rehabilitation and closure of the mine will be informed by the various technical assessments. Green Road (2026) will provide a Mine Closure Plan to ensure all elements of the mine closure and associated water discharges and rehabilitation are effectively managed such that in the long term:

- > The Project Site, and any structures on it, will remain in a stable, self-sustaining, rehabilitated state;
- > The soils on the site are such that it is highly unlikely that there will be a risk to human health, considering the post-closure use of that land; and
- > Any water discharging from the Project Site, and any groundwater under the Project Site, will be of a quality such that it will not adversely affect aquatic life, or other users of the water resource.

Green Road (2026) will prepare a Passive Water Treatment System, which will be designed for the closure and rehabilitation phase of the Project. Performance and water monitoring will continue throughout closure and rehabilitation, ensuring the effective and ongoing

treatment of mine-impacted waters is provided to avoid any adverse effects on water quality post closure.

3.4.2 Prohibited Activities

No activities involved in the Project are Prohibited under the RMA.

3.5 PERSONS AFFECTED

Rua Gold considers the following persons, groups and entities are likely to be affected by the Project:

- > Local hapū, iwi authorities, and Māori landowners;
- > Department of Conservation;
- > Buller District Council;
- > West Coast Regional Council;
- > Local residents, specifically, all immediate neighbours, and those identified by technical assessments as being impacted by the proposal;

3.5.1 Consultation undertaken with the above and other persons or groups and how this has informed the Project

Te Rūnanga o Ngāi Tahu and Te Runanga o Ngāti Waewae (as the relevant iwi authorities and Treaty settlement entity)

Rua Gold has been consulting closely with representatives of Te Rūnanga o Ngāi Tahu and Te Rūnanga o Ngāti Waewae regarding the Project, including this FTAA referral application. Rua Gold has clearly stated its intention to submit a referral application to seek eligibility for this Project to use the FTAA to each of those entities.

It is noted of Te Rūnanga o Ngāi Tahu and Te Rūnanga o Ngāti Waewae have provided letters of support for the referral application and the Auld Creek Project (included in **Attachment 13**). Rua Gold will continue to work with and engage Ngāi Tahu and continue working closely with Ngāti Waewae to ensure all iwi values are realised and comprehensively understood in relation to the Project site and its surrounds; and subsequently, how any effects of the Auld Creek Project on these values can be managed. It is expected that the identification of such values and effects will continue to form the basis of discussions between Rua Gold and the relevant iwi and will inform the substantive application when ultimately lodged.

Rua Gold notified the relevant iwi authority in accordance with section 11(1)(b)(ii) of the FTAA on 16 March 2026. Evidence of this notification is included as **Attachment 20**.

Buller District Council (as the administering agency for the Buller District)

Rua Gold has consulted with the Buller District Council, outlining the Project and its intention to submit a referral application to seek eligibility under the FTAA. The Buller District Council confirmed it was comfortable with the consultation undertaken between Rua Gold and the Buller District Council at both the regulatory staff and governance levels. Consultation with the Buller District Council has helped shape the Project, and the Council has expressed its support, noting the positive economic benefits expected for Reefton. The Mayor of the Buller District provided a letter of support enclosed as **Attachment 13** to this application. Rua Gold will continue to engage with the Buller District Council throughout the regulatory process, including the development of the substantive application, should the referral application be successful.

Rua Gold notified the Buller District Council Regulatory Manager in accordance with section 11(1)(b)(i) of the FTAA. Evidence of this notification is included in **Attachment 20**.

The Buller District and West Coast Region Local Communities

Rua Gold has hosted multiple community meetings and is actively engaging with the Reefton community on the Project, including the targeted consenting timeframes and lodgement targets. Further community consultation from Rua Gold has included a monthly newsletter and social media groups, which continue to be regularly updated as the Project progresses. Development West Coast have provided a letter of support for the Project (included as **Attachment 13** to this application), acknowledging the Project's economic benefit to both local communities and the region.

West Coast Regional Council (as the administering agency for the West Coast Region)

Rua Gold has consulted with West Coast Regional Council, outlining the Project and its intention to submit a referral application to seek eligibility under the FTAA. Rua Gold is committed to continuing engagement and consultation with the Council as the Project develops through regulatory processes, including the development of a substantive application, should the referral application be successful.

Rua Gold notified the West Coast Regional Council in accordance with section 11(1)(b)(i) of the FTAA on 16 March 2026. Evidence of this notification is included in **Attachment 20**.

Department of Conservation (as the administering agency for the Conservation Act and Wildlife Act 1953)

DOC (at various regulatory levels) has been regularly consulted by Rua Gold throughout the exploration phase and the initial development of the Project, including Rua Gold's intention to submit a referral application to seek eligibility under the FTAA. Rua Gold has met with

DOC both within the Project site in Reefton and in the DOC Greymouth office. DOC was engaged during the inception of the Project to discuss the proposed mining method, including the proposed portal and Adit located within the Victoria Forest Park, re-rerouting of the bike track, and upgrading and use of existing access tracks within the conservation park. Rua Gold will continue to provide regular updates on progress throughout further exploration activities and the consent process, should the referral application be successful.

Rua Gold notified DOC and the Director General of Conservation on 18 March 2026 in accordance with section 11(1)(b)(iii) of the FTAA. Consultation with the DOC Fast Track team has continued throughout this notification period, including the provision of the draft application for review and a formal consultation meeting on 16 April to discuss initial feedback on the application. Evidence of this notification is included in **Attachment 20**.

Ministry for the Environment (as the administering agency for the RMA)

Rua Gold has notified the Ministry for the Environment on 16 March 2026, outlining the Project and its intention to submit a referral application to seek eligibility under the FTAA.

New Zealand Petroleum and Minerals (as the administering agency for the CMA)

Rua Gold has consulted and met with New Zealand Petroleum and Minerals (“**NZP&M**”) on multiple occasions and has clearly discussed its intention to submit a referral application to seek eligibility under the FTAA. More specifically, Rua Gold has consulted NZP&M on the referral application and inclusion of a mining permit within the application. NZP&M were comfortable with the application and have provided further guidance to the level of information required within the referral application.

Rua Gold notified NZP&M in accordance with section 11(1)(b)(iii) of the FTAA on 16 March 2026. Consultation with NZP&M has continued throughout this notification period, including the provision of the draft application for review and a formal consultation meeting on 16 April to discuss initial feedback on the application evidence of this notification is included in **Attachment 20**.

3.5.2 A Summary of how consultation responses have informed the Project

Rua Gold has sought to consult extensively with the above administering agencies from the outset of Project inception. Therefore, consultation with relevant administering agencies has largely shaped the design and strategy of this Project. The 20-working day period under section 13(c) expired at midnight on 17 March 2026. For the purposes of section 13(4)(ka), it is noted that during this period consultation was undertaken with key regulators, including DOC and NZP&M. A copy of the draft referral application, along with the Mining Permit Area

shapefiles, was provided for review and feedback prior to lodgement. Further details on the consultation undertaken to date are included below.

DOC has been actively engaged from the preliminary stages of the Project, acknowledging that the mineral resource is located within Victoria Park Forest as conservation land. Once Rua Gold had developed a comprehensive understanding of the extent of the resource and confirmation that mineral extraction was feasible, DOC staff from the local West Coast office were invited onsite and were briefed on the range of potential access options and mining methods.

DOC has remained actively involved throughout the option analysis of all mining options and the consideration of site infrastructure locations. As discussed previously in this application, the poor ground conditions and geological characteristics of the Auld Creek deposit indicated that an open pit mining offered the highest level of safety and viability from a technical perspective. DOC expressed a preference for the underground mining method as the preferred option for the Project, in order to avoid and minimise effects on the natural environment and Victoria Park Forest from the outset. During consultation, DOC raised concerns surrounding the existing four-wheel drive access track to be repurposed as a haul road and queried the extent of disturbance required; Rua Gold highlighted that the proposed narrow vein mining method requires smaller mining equipment and vehicles, which can utilise the smaller-sized access track with only minor upgrades required to ensure worker health and safety.

NZP&M has also been consulted and engaged from Project inception. NZP&M advised that the FTAA would provide an appropriate mechanism for Rua Gold to obtain all approvals, including mining permits, in an efficient and timely manner compared to a standard mining application, ensuring the operation can be granted in a single suite without delay.

Accordingly, NZP&M has been consulted throughout the preparation of this application to ensure that all necessary information required under the section 13 of the FTAA is provided to facilitate an efficient assessment process.

In addition, Rua Gold consulted with WorkSafe New Zealand (“**WorkSafe**”), as key government agency working alongside NZP&M. WorkSafe is responsible for administering and enforcing the Health and Safety at Work (Mining Operations and Quarrying Operations) Regulations 2016. WorkSafe was consulted on the proposed underground mining operations, with specific regard to the mining phases and the proposed ground stabilisation works outlined in the Terra Firma (2026) memorandum (refer to **Attachment 16**).

During the course of the substantive application period consultation will occur with WorkSafe on proposed conditioning programme and initial health and safety arrangements, to ensure a sensible and appropriate approach to managing operational safety risks.

As noted above, Ngāti Waewae have been actively engaged throughout the Project, including Project inception. This consultation has largely shaped the design of the Project, including the use of an underground mining methods to ensure significant effects on the environment are avoided from the Project outset. Additionally, consultation with Ngāti Waewae has largely informed the proposed closure and management strategy for the mine as discussed in Section 3.4.1.1.

Rua Gold has also sought to actively engage with both the WCRC and BDC. Project briefings have occurred regularly. Additionally, both councils were provided the draft application for review and feedback, and neither entity has raised any substantive issues with Rua Gold regarding the nature and scope of this referral application.

3.5.3 Treaty settlements that apply to the project area and a summary of the relevant principles and provisions in those settlements

Ngāi Tahu Claims Settlement Act 1998

Ngāi Tahu are the iwi that, under Te Rūnanga o Ngāi Tahu Act 1996 and Ngāi Tahu Claims Settlement Act 1998 and in the Ngāi Tahu WAI 27 claim under Te Tiriti o Waitangi, hold ultimate authority over the broader takiwa.

Ngāi Tahu ki Murihiku is the collective of the four representative papatipu rūnaka of Murihiku, namely Waihōpai Rūnaka, Te Rūnanga o Awarua, Te Rūnanga o Ōraka / Aparima and Hokonui Rūnanga. They are recognised as mana whenua under the Ngāi Tahu Claims Settlement Act 1998 and in the Ngāi Tahu WAI 27 claim under Te Tiriti o Waitangi.

Ngāi Tahu and the Crown signed a Deed of Settlement on 21 November 1997. The Ngāi Tahu Claims Settlement Act 1998 gives effect to the Deed of Settlement.

The Ngāi Tahu settlement includes:

- > An apology from the Crown;
- > Redress in respect of Aoraki/Mount Cook;
- > Cultural redress;
- > Commercial/economic redress; and
- > Non-tribal redress.

The Crown apology recognised Ngāi Tahu as "the tāngata whenua of, and as holding rangatiratanga within, the Takiwā of Ngāi Tahu Whānui."

The most relevant principles and provisions in the settlement in respect of the Project include cultural redress, conservation management strategies, taonga species, recognition of mana, management input, and nohoanga entitlements.

Conservation Management Strategies

The Treaty settlement provides Ngāi Tahu with redress relevant to conservation management strategies and plans. The West Coast Conservation Management Strategy ("CMS") was prepared in consultation with Ngāi Tahu. This redress is not directly relevant to the Project as:

- > Te Rūnanga o Ngāi Tahu is a statutory adviser to the Minister of Conservation in respect of specific sites. As a statutory adviser, Te Rūnanga o Ngāi Tahu may provide advice directly to the Minister of Conservation when they are considering any draft conservation management plan or conservation management strategy under the Conservation Act 1987 in respect of a specific site. The Minister of Conservation must have particular regard to the advice given by Te Rūnanga o Ngāi Tahu. The Project does not involve any sites for which Te Rūnanga o Ngāi Tahu has a role as a statutory advisor.
- > The Director-General of Conservation must consult with, and have particular regard to the views of, Te Rūnanga o Ngāi Tahu in respect of the preparation of every conservation management strategy or conservation management plan that affects any of the leaseback conservation areas or the gift areas. The Project does not involve any of the leaseback conservation areas or the gift areas.

Taonga Species

In the Treaty settlement the Crown acknowledges the cultural, spiritual, historic and/or traditional association of Ngāi Tahu with each of the taonga species, and taonga fish species. Some of the species identified within the Project Site are taonga species or taonga fish species under the settlement. Rua Gold has worked closely with Ngāti Waewae as Te Rūnanga o Ngāi Tahu hapu and representatives of Te Rūnanga o Ngāi Tahu, and this continued collaboration throughout the development of the Project will ensure any effects on taonga species and taonga fish species are appropriately addressed.

Overall, the views of Te Rūnanga o Ngāi Tahu and Ngāti Waewae in respect of taonga species are directly relevant to the FTAA process. The settlement provides Te Rūnanga o Ngāi Tahu with a voice concerning the management of taonga species and taonga fish species:

- > The Minister of Conservation is required to consult with, and have particular regard to, the views of Te Rūnanga when making policy decisions concerning the protection, management or conservation of that taonga species;
- > Te Rūnanga o Ngāi Tahu is appointed as an advisory committee to provide advice to the Minister of Conservation on all matters concerning the management and conservation by the DOC of freshwater fisheries within the Ngāi Tahu Claim Area; and
- > In all matters concerning the management and conservation by the DOC of taonga fish species within the Ngāi Tahu Claim Area, the Minister of Conservation must consult with, and have particular regard to, the advice of that advisory committee.

Recognition of Mana

Ngāi Tahu's mana is recognised in the Treaty settlement through statutory acknowledgements, deeds of recognition, Tōpuni and place names.

A statutory acknowledgement is an acknowledgement by the Crown of Te Rūnanga o Ngāi Tahu's particular cultural, spiritual, historical, and traditional association with a site or area. Statutory acknowledgements recognise the mana of Ngāi Tahu over a range of sites and areas in the takiwā and have implications for processes under the RMA and the Heritage New Zealand Pouhere Taonga Act. There are no statutory acknowledgements within the Project area. However, there is a statutory acknowledgement for the Buller River, located to the north of the Project, it is noted the Project is not in this catchment, however, the Project is relevant to the Inangahua catchment which enters the Buller River.

The Crown agency responsible for the management of a site or area subject to a statutory acknowledgment was required to enter into a deed of recognition, providing for agreed input by Te Rūnanga o Ngāi Tahu into management processes. The settlement includes a deed of recognition for the Buller River.

Tōpuni provide an overlay of the cultural, spiritual, historic, and traditional association of Te Rūnanga o Ngāi Tahu, on certain areas of land managed by the DOC. The Ngāi Tahu values of the Tōpuni are a mandatory consideration in approving management policies, plans and strategies under the Conservation Act. Te Rūnanga o Ngāi Tahu must also be consulted in the preparation of those documents. There are no Tōpuni within the Project Site.

The settlement also amended the place name of various locations in the takiwā. No names within the Project Site were amended.

Management Input

Te Rūnanga o Ngāi Tahu has the right to nominate persons to dedicated seats on the following statutory bodies:

- > One seat on the New Zealand Conservation Authority; and
- > Two seats on each Conservation Board wholly within the Ngāi Tahu Takiwā.

The New Zealand Conservation Authority and relevant Conservation Boards must be invited to provide written comments.

There are a range of protocols that have been developed with the DOC, setting out:

- > The ways in which the DOC will exercise its functions, powers and duties in relation to specified matters within the Ngāi Tahu Claim Area; and
- > How the DOC will, on a continuing basis, interact with Te Rūnanga o Ngāi Tahu and provide for Te Rūnanga o Ngāi Tahu's input into its decision-making process, including in respect of freshwater fisheries and RMA involvement.

The protocols are required to be noted in conservation management strategies, conservation management plans and national park management plans affecting the Ngāi Tahu Claim Area. The CMS refers to the DOC and Ngāi Tahu protocols included as Section 3.1.3.7.

Nohoanga

The Treaty settlement provides nohoanga entitlements for the purpose of permitting members of Ngāi Tahu Whanui to temporarily occupy land close to the waterways on a non-commercial basis, so as to have access to the waterways for lawful fishing and gathering of other natural resources. There are no nohoanga entitlements within the Project Site.

3.5.4 Any principles or provisions in the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019 that would be invoked by the project

Not relevant to the Project.

3.5.5 Treaty Settlement Land

The Project will not be located on land returned under a treaty settlement.

3.5.6 Public Works Act 1981

No processes have been undertaken under the Public Works Act 1981 in relation to the Project.

3.5.7 Māori Land, Marae, or Identified Wāhi Tapu within the Project Area

There is no marae or other identified wāhi tapu within the Project.

3.6 LEGAL INTERESTS

3.6.1 Provide a description of any legal interests you or any others applying, have in the land on which the project will occur, including a statement of how that affects your ability to undertake the work.

Rua Gold has entered into investigation and development agreements with the relevant landowners of the properties subject to the Project Site to provide Rua Gold with the property rights necessary to construct and operate the surface infrastructure required on these properties. Rua Gold will apply for an Overseas Investment Office approval for purchase or lease of the Project Site (noting the applicant is a subsidiary of a foreign company based in Vancouver, Canada).

Rua Gold may also need easements for the transmission lines or other construction access requirements that may cross over a privately owned property, depending on the final constructed routes, and will discuss this directly with the landowner as required and if required, establish appropriate legal instruments.

It is acknowledged that there are several paper roads which run through the Surface Infrastructure Site. Rua Gold will enter into a road stopping agreement with the Buller District Council under the appropriate process where the status of the land will be cancelled and then amalgamated with adjoining titles.

3.7 OTHER MATTERS

3.7.1 Compliance and Enforcement History

On 31 May 2019, Rua Gold underwent a change of control within the meaning of the Crown Minerals Act 1991, for which the Minister's consent was not sought or obtained. This constituted a breach of the CMA because Rua Gold was, and is, the permit operator for a Tier 1 exploration permit (EP 60491). On 26 February 2020, Rua Gold Limited received a warning letter from New Zealand Petroleum and Minerals, in relation to the breach. The warning letter confirmed the Minister does not intend to revoke Rua Gold's exploration permit or prosecute Rua Gold for the breach. To the best of Rua Gold's knowledge, it has not otherwise contravened any environmental regulations.

3.7.2 Have any activities included in the project, or any that are substantially the same as those involved in the project, previously been the subject of an application or a decision under a specified Act?

Rua Gold has applied for exploration permits and associated access arrangements (as outlined in Table 1 above) under sections 23 and 61 of the Crown Minerals Act 1991 as a specified Act.

It is further noted that applications have recently been made to NZP&M to change the minerals to which EP 60747 relates to include all metallic minerals (excluding uranium) and all non-metallic minerals, and to extend the duration of EP 60648.

These applications include exploratory works and activities (e.g., drilling) that have been informative in assisting Rua Gold in confirming the resource and moving forward with this referral application.

3.7.3 If an application has been made, provide details of the application.

Exploration Permits

The Golden Point EP 60648, pursuant to sections 25, 29A and 32 of the CMA, was approved on 19 March 2021 and provides Rua Gold the exclusive right to explore for gold and silver in the permit area. It is noted that since this application was granted, subsequent applications for an extension of land to which the permit relates and a change to the minerals to which the permit relates, including all metallic minerals (excluding uranium) and all non-metallic minerals, have been applied for and approved. Finally, an Extension of Duration application was submitted to NZP&M on 16 December 2025 and is currently being assessed. EP 60648 is included as **Attachment 3** to this application.

The Cumberland EP 60747, pursuant to sections 25, 29A and 32 of the CMA, was approved on 14 December 2022 and provides Rua Gold the exclusive right to explore for gold and silver within the permit area. A Change of Minerals application was submitted to NZP&M on 21 March 2026 and is currently still being assessed. EP 60747 is included as **Attachment 3** to this application.

Exploration activities under section 2 of the CMA include drilling, dredging, or excavations (whether surface or subsurface) that are reasonably necessary to determine the nature and size of a mineral.

Access Arrangements

The access arrangement 93190-AA (related to EP 60648) pursuant to section 61 of the CMA was provided 18 June 2021 as an agreement between the Minister of Conservation to access

conservation land related to the permit area. Access arrangement 93190-AA provides Rua Gold with access to the associated permit area and disturbance of approximately 3.998 ha of Victoria Park Forest and 0.01ha of Merrijigs Wildlife Management Area including:

- > 22 drill pad sites;
- > one pump site; and
- > three trenches.

The access arrangement 93190-AA (related to EP 60648) pursuant to section 61 of the CMA was provided on 21 December 2023 as an agreement between the Minister of Conservation to access conservation land related to the permit area. Access arrangement 109859-AA provides Rua Gold with access to the associated permit area and disturbance of approximately 0.3075 ha of Victoria Park Forest and includes:

- > 27 drill pad sites; and
- > One camp.

3.7.4 If a decision has been made, also provide the outcome of the decision and the reasons for it.

A number of the above permits have been approved; it is noted there are some pending CMA applications as outlined in Section 3.7.2. However, it should be noted the permits and arrangements remain in good standing and the proposed activities are considered to be in accordance with the relevant standards under the CMA.

3.7.5 Climate Change and Natural Hazards

The main natural hazard risk to the Project is from potential seismic events, but it is no greater than the general risk profile in this area for this type of event. The site is, however, not subject to any specific natural hazard overlays in the West Coast natural hazards database/mapping service. The underground mine and associated surface infrastructures design and construction methodology will be informed by multiple engineering design reports to ensure the risks from natural hazards are managed to acceptable levels. Therefore, the Project is not subject to significant risks associated with climate change and natural hazards.

3.8 SPECIFIC PROPOSED APPROVALS

3.8.1 Approvals under the Resource Management Act 1991

If your application is seeking a consent for an activity that would otherwise be applied for under the Resource Management Act 1991, including an activity that is prohibited under the Act, provide the information below:

3.8.1.1 Resources Consents

The Project is seeking approvals for activities that would otherwise be applied for under the RMA. An assessment against any relevant national policy statement and national environmental standards is provided in the sections below (“**NPS and NES**”)

National Policy Statement for Indigenous Biodiversity (“NPS-IB”)

The NPS-IB is relevant to the Auld Creek Project because the Project may involve disturbing and/or removing indigenous vegetation and wetlands to construct the underground mine, access portal, ventilation shafts, and upgrade haul roads / locate infrastructure and processing plants. However, it is important to note that the Project design and consideration of alternatives aim to minimise surface impact as much as is practicable. This approach seeks to avoid or reduce potential impacts on indigenous vegetation and habitats.

The objective of the NPS-IB is:

*‘...to maintain indigenous biodiversity across Aotearoa New Zealand so that there is at least no overall loss in indigenous biodiversity after the commencement date; and
to achieve this:*

- (i) through recognising the mana of tangata whenua as kaitiaki of indigenous biodiversity; and*
- (ii) by recognising people and communities, including landowners, as stewards of indigenous biodiversity; and*
- (iii) by protecting and restoring indigenous biodiversity as necessary to achieve the overall maintenance of indigenous biodiversity; and*
- (iv) while providing for the social, economic, and cultural wellbeing of people and communities now and in the future.’*

The policies of the NPS-IB considered to be of most relevance to the proposal are as follows:

Policy 1: *Indigenous biodiversity is managed in a way that gives effect to the decision-making principles and takes into account the principles of the Treaty of Waitangi.*

Policy 3: *A precautionary approach is adopted when considering adverse effects on indigenous biodiversity.*

Policy 4: *Indigenous biodiversity is managed to promote resilience to the effects of climate change.*

Policy 5: *Indigenous biodiversity is managed in an integrated way, within and across administrative boundaries.*

Policy 8: *The importance of maintaining indigenous biodiversity outside SNAs is recognised and provided for.*

Policy 10: *Activities that contribute to New Zealand's social, economic, cultural, and environmental wellbeing are recognised and provided for as set out in this National Policy Statement.*

Policy 13: *Restoration of indigenous biodiversity is promoted and provided for.*

Policy 17: *There is improved information and regular monitoring of indigenous biodiversity.*

A key function of the NPS-IB is the requirement of every territorial authority to undertake a district wide assessment of land and identify areas of significant indigenous vegetation or significant habitat of indigenous fauna that qualify as a Significant Natural Area (“**SNA**”) as defined under the NPS-IB. It is noted that there is no SNA subject to the Project Site.

The NPS-IB was recently amended in December 2025 to simplify and align consent rules for quarrying and mining across national instruments. The amendments reduce compliance barriers and support Government priorities for infrastructure and growth, while retaining environmental safeguards.

Specifically, the amendments now require the effects management hierarchy to be applied to development related to mineral extraction and ancillary infrastructure within an SNA. Although this does not directly impact the Project (given the absence of an SNA), it highlights the Auld Creek Project's alignment with national directives at a central level as a significant mineral extraction Project.

Clause 3.16 of the NPS – Indigenous biodiversity outside SNAs – is the most relevant to the application and states:

1. *If a new subdivision, use, or development is outside an SNA and not on specified Māori land, any significant adverse effects of the new subdivision, use, or development on indigenous biodiversity outside the SNA must be managed by applying the effects management hierarchy.*
2. *All other adverse effects of any activities that may adversely affect indigenous biodiversity that is outside an SNA (other than indigenous biodiversity on specified Māori land (see clause 3.18)), must be managed to give effect to the objective and policies of this National Policy Statement.*
3. *Every local authority must make or change its policy statements and plans to be consistent with the requirements of this clause.*

It is anticipated that the Project will not result in significant adverse effects on indigenous biodiversity. Nevertheless, the effects management hierarchy has been applied throughout the Project design, with regard to the proposed underground mining operation, such that adverse effects on indigenous biodiversity are avoided and, where avoidance was not practicable, minimised. The effects management hierarchy will continue to be applied through subsequent stages of the project.

The Project is consistent with the above objectives and policies for the following reasons:

- > Rua Gold has engaged with mana whenua in relation to the Auld Creek Project and understands that maintaining the quality of the indigenous biodiversity is important to preserving the cultural association with these ecosystems and habitats;
- > The Project has adopted an underground mining operation to ensure any effects on the environment, including vegetation and indigenous biodiversity is avoided to the extent practicable;
- > The effects management hierarchy will be implemented to address any potential or actual effects in relation to indigenous biodiversity; and
- > Any unavoidable loss of high-quality indigenous biodiversity will be addressed via mitigation and / or offsetting/compensation measures (including via management plans setting out the applicable creation and restoration).

For these reasons above the Auld Creek Project is consistent with the objectives and policies of the NPS-IB.

National Policy Statement for Freshwater Management (“NPS-FM”)

The NPS-FM sets out the objectives and policies that direct local authorities to manage water in an integrated and sustainable way, while providing for economic growth within set water quantity and quality limits.

The objective of the NPS-FM is:

‘...to ensure that natural and physical resources are managed in a way that prioritises:

- a) first, the health and well-being of water bodies and freshwater ecosystems*
- b) second, the health needs of people (such as drinking water)*
- c) third, the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future.’*

In addition, the following policies are relevant to the Project:

Policy 1: *Freshwater is managed in a way that gives effect to Te Mana o te Wai.*

Policy 2: *Tangata whenua are actively involved in freshwater management (including decision-making processes), and Māori freshwater values are identified and provided for.*

Policy 3: *Freshwater is managed in an integrated way that considers the effects of the use and development of land on a whole-of-catchment basis, including the effects on receiving environments.*

Policy 4: *Freshwater is managed as part of New Zealand's integrated response to climate change.*

Policy 5: *Freshwater is managed (including through a National Objectives Framework) to ensure that the health and well-being of degraded water bodies and freshwater ecosystems is improved, and the health and well-being of all other water bodies and freshwater ecosystems is maintained and (if communities choose) improved.*

Policy 6: *There is no further loss of extent of natural inland wetlands, their values are protected, and their restoration is promoted.*

Policy 7: *The loss of river extent and values is avoided to the extent practicable.*

Policy 8: *The significant values of outstanding water bodies are protected.*

Policy 9: *The habitats of indigenous freshwater species are protected.*

Policy 10: *The habitat of trout and salmon is protected, insofar as this is consistent with Policy 9.*

Policy 11: *Freshwater is allocated and used efficiently, all existing over-allocation is phased out, and future over-allocation is avoided.*

Policy 12: *The national target (as set out in Appendix 3) for water quality improvement is achieved.*

Policy 13: *The condition of water bodies and freshwater ecosystems is systematically monitored over time, and action is taken where freshwater is degraded, and to reverse deteriorating trends.*

Policy 14: *Information (including monitoring data) about the state of water bodies and freshwater ecosystems, and the challenges to their health and well-being, is regularly reported on and published.*

Policy 15: *Communities are enabled to provide for their social, economic, and cultural wellbeing in a way that is consistent with this National Policy Statement.*

In considering the Project against the above provisions, the following is noted:

- > Rua Gold has engaged with tangata whenua in relation to the Auld Creek Project (as discussed throughout this application) and understands that maintaining the quality of the surrounding freshwater bodies and habitats and wetland environments is important to preserving the cultural association with these environments. Rua Gold will continue to work closely with tangata whenua throughout the consenting and development processes of the Auld Creek Project.

- > Recommendations from technical reports prepared for the Project will ensure there is a condition framework for the management of activities with the potential to impact freshwater environments, to ensure all actual and potential adverse effects are appropriately managed;
- > The Project will ensure comprehensive water treatment during both operation and closure of the mine which is informed by technical specialists. Rua Gold will ensure the proposed water treatment is aligned with water quality objectives and limits to ensure the effective protection of aquatic ecology and maintain the health and wellbeing of water quality in the Devils Creek catchment;
- > Rua Gold will ensure technical assessments provide an integrated approach to assess and account for the potential and actual adverse effects of the Project on land and freshwater resources including the effects of sedimentation, runoff, and mining activities;
- > Rua Gold has sought to avoid the loss of extent or values of rivers through scoping assessment and confirming the location of the processing plant, the chosen location avoids the need for water diversion and therefore is aligned with the NPS-FM policy direction;
- > Regarding efficient use of freshwater and avoiding future overallocation, discharges from the Project will be managed in accordance with water quality limits set by technical specialists. These technical specialists will take into account the receiving environment and confirm the limits are appropriate to avoid overallocation;
- > The protection of the habitats of indigenous freshwater species will be provided for through the measures such as suitable water quality limits and discharge standards, effective erosion and sediment controls and the implementation of required Management Plans including a Fish Management Plan to address any required fish salvage activities;
- > Comprehensive water monitoring will continue, this monitoring will provide ongoing data to ensure that the Project is managed in a manner that aligns with policies 13 and 14 of the NPS-FM;

Similar to the NPS-IB above, the NPS-FM was recently amended in December 2025 to simplify and align policy requirements for quarrying and mining across national instruments. The amendments reduce compliance barriers and support Government priorities for infrastructure and growth, while retaining environmental safeguards.

The NPS-FM 2025 amendments relevant to the Project include:

- > Amended requirements for including policy in regional plans so they provide for ‘extraction of minerals and ancillary activities’ that result in the loss of extent or values of natural inland wetlands, where they have a ‘functional need’ or ‘operational need’ to undertake the activity under subclauses 3.22(1)(d) (e)(iii).
- > Clause 3.22(1)(d) (e) retains provisions to ensure effects are managed through the effects management hierarchy and ensure that the extraction of the mineral will provide significant national or regional benefits.

This alignment acknowledges the importance of mineral extraction to New Zealand's economy, while also recognising that this activity is directly limited by its functional requirements, as the resource is fixed. Additionally, Rua Gold will implement a risk-based management hierarchy to address the impacts on water quality, quantity, and the aquatic ecological values in downstream receiving environments.

For the reasons detailed above, the Auld Creek project is consistent with the objectives and policies of the NPS-FM.

National Environmental Standards for Freshwater (“NES-FW”)

The NES-FW regulates activities that pose risks to the health of freshwater and freshwater ecosystems. Of particular relevance to the proposal are rules relating to activities that may affect natural wetlands and the construction of culverts.

Further, amendments to the NES-F were enacted in December 2025 aligned with the NPS-FM as described above. These amendments include requirements to satisfy that the activity has a ‘functional need or operational need’ to adversely affect natural wetlands under Regulation 45D(6)(b). It is considered the Project will have an operational need to possibly adversely affect any natural wetland occurring within the site (noting that these wetland are highly modified and within the farmland area only).

The construction of culverts to establish site access may result in a noncompliance to conditions under Regulation 70(2), the design and construction of culverts will be undertaken in accordance with best practice where possible and all information requirements will be provided in accordance with Regulation 63. It is noted the effects management hierarchy will be applied appropriately.

National Policy Statement for Infrastructure (“NPS-I”)

The NPS-I sets out the objectives and policies for infrastructure and seeks to guide the efficient development, management, and upgrading of infrastructure across New Zealand.

The infrastructure proposed as part of the Project does not meet the relevant definition under the RMA. As such, the National Policy Statement for Infrastructure is not applicable.

National Policy Statement for Greenhouse Gas Emissions from Industrial Process Heat (“NPS-GGE”)

The NPS-GGE seeks to reduce greenhouse gas emissions by managing air discharges from the production of industrial process heat.

It is noted the processing plant and associated mining operation may require the use of kilns, burners and / or furnaces during processing operations. Rua Gold is committed to reducing greenhouse gas emissions throughout the Auld Creek Project. Where practicable, the Project will aim to implement best-practice emissions-reduction strategies, including sustainable mining practices.

National Environmental Standards Statement for Greenhouse Gas Emissions from Industrial Process Heat (“NES-GGE”)

The NES-GGE seeks to establish nationally consistent rules for specific greenhouse gas emitting industrial process heat activities. In addition, the standards specify the purpose, content, and review requirements of an emissions plan.

Rua Gold is committed to reducing its carbon footprint and greenhouse gas emissions where possible throughout the Project. The mining operation may require consent under the NES-GGE for the use of kilns, burners and / or furnaces. Appropriate assessment against regulations 16 and 17 of the NES-GGE will be applied including assessment of any technically feasible and financially viable lower-emissions alternatives and adverse effects on climate change. An appropriate emissions plan will be developed in accordance with standards and effective monitoring conditions sought as part of the consent.

National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health (“NES-CS”)

The NES-CS seeks to ensure that land affected by contaminants in soil is appropriately identified and assessed before it is developed. If necessary, affected land will need to be remediated or the contaminants contained to make it safe for human use. It is noted that mining activities commonly involve the use of hazardous substances, which may be listed on the HAIL.

Noting the site’s mining history and surrounding farmland, a contaminated land assessment will be required to identify pre-existing contamination sources and ensure future potential disturbance of the land can be undertaken in a manner that does not pose a risk to human health and/or ecological receptors. The first stage of the contaminated sites assessment

process is to prepare a Preliminary Site Investigation report as engaged by Green Road (2026) and discussed in Section 3.4.1.5 above. This will determine if a HAIL activity has occurred or if the site does not meet regulation thresholds identified in the NES-CS. Appropriate consent, assessment and management of contaminated land relevant to the Project Site will be undertaken in accordance with the NES-CS.

National Environmental Standards for Air Quality (“NES-AQ”)

The NES-AQ came into effect on 1 June 2011 and contains standards which set a guaranteed minimum level of health protection for people living in New Zealand, particularly in relation to discharges within urban airsheds. No resource consent for the Project is required under these regulations. Rua Gold will ensure that the management of dust and other discharges of airborne particulates associated with the construction and operation of the mining activity are appropriately managed.

National Policy Statement for Natural Hazards (“NPS-NH”)

The NPS-NH seeks to manage natural hazards risks to people and property associated with development using a risk based approach. Under clause 1.3 the NPS-NH does not apply to primary production activities as defined in the National Planning standards.

The National Planning Standards define primary production as:

- (a) any aquaculture, agricultural, pastoral, horticultural, mining, quarrying or forestry activities; and*
- (b) includes initial processing, as an ancillary activity, of commodities that result from the listed activities in a);*
- (c) includes any land and buildings used for the production of the commodities from a) and used for the initial processing of the commodities in b); but*
- (d) excludes further processing of those commodities into a different product.*

Therefore, it is assessed that the NPS-NH therefore does not apply to the Project (or any parts of it) based on the definition of primary production which captures mining activities under clause (a), and ancillary operations, facilities, land and buildings (under clauses (b) and (c)).

National Policy Statement for Highly Productive Land (“NPS-HPL”)

The land subject to the Project is not Highly Productive Land as such the National Policy Statement for Highly Productive Land is not applicable.

National Environmental Standard for Sources of Drinking Water (“NES-HDW”)

The NES-HDW sets requirements for the protection of sources of human drinking water from contamination. A human drinking water source is a natural water body that is used to supply a community with drinking water. It is noted that Auld Creek supplies drinking water to Blacks Point, located downstream of the Project. However, it is anticipated no activities, including discharge, take or use or development will occur to Auld Creek. The Auld Creek Dam is currently established as an existing monitoring site and will continue to be monitored for any potential effects below the Project Site. Therefore, no drinking water supplies that will be affected by the Project.

3.8.2 Approvals relating to Conservation Act 1987, Reserves Act 1977, Wildlife Act 1953, and National Parks Act 1980

3.8.2.1 Concessions

For applications seeking a concession that include a lease, answer the following:

As discussed in Section 3.1.3, the following concessions are sought as part of the Project:

- > Monitoring activities may include structures and equipment on DOC land including water monitoring of both downstream of Auld Creek and outside of the mining permit area;
- > Monitoring of wildlife and potential pest traps may be required outside of the mining area, with specific regard to the Alborn Skink;
- > The Project may require electrical transmission lines across DOC land to power the portal access and mining operation located on the Mine Site; and
- > The existing Globe Bike Track will need to be rerouted; this adjusted route may occur outside of the mining permit area.

It is likely the above concessions will be made way of easements; however, leases may be required where deemed more appropriate.

Will the lease be for a term (including any renewals that will, or is likely to, be more than 50 years?

No. Any lease will not exceed a term of 50 years. The proposed term for any lease will be 35 years.

3.8.3 Approvals Relating to complex Freshwater Fisheries Activities.

If your application is seeking an approval or dispensation that would otherwise be applied for under regulation 42 or 43 of the Freshwater Fisheries Regulations 1983 in respect of a complex freshwater fisheries activity provide the information requested below:

3.8.3.1 Whether an in-stream structure is proposed (including formal notification of any dam or diversion structure), and a description of the extent to which this may impede fish passage

As discussed in Section 3.1.6 above, although it is not the intention to impede fish passage, it may be necessary to prevent exotic / pest fish from passing through culverts in order to protect the threatened indigenous fish populations upstream, or similarly, the provision of fish passage may not be deemed necessary due to low flow path, or shallow stream beds.

3.8.3.2 Whether any fish salvage activities or other complex freshwater fisheries activities are proposed.

If required, an Aquatic Ecology Management Plan will be prepared as part of the substantive application; this management plan will include specific details of any salvage activities required, including any required capture, handling, or salvage, and any required relocation of fish during construction activities. The management plan will be drafted in accordance with best practice and guidance under the Freshwater Fisheries Regulations 1983, including ensuring any required fish relocation is provided for within the same reach of the watercourse.

3.8.4 Approvals Relating to Crown Minerals Act 1991

3.8.4.1 Access Arrangements

For an approval for an access arrangement that would otherwise be applied for under section 61 or 61B of the Crown Minerals Act 1991, provide:

Evidence that the applicant or person has provided each owner and occupier of the relevant land with a notice in writing of their intention to obtain an access arrangement

In accordance with section 59(2) of the CMA, Rua Gold has provided each owner and occupier a notice of request to grant the right of access. Evidence of this is included as **Attachment 21** to this application.

Evidence that the notice complies with the requirements in section 59(2) of the Crown Minerals Act, and any matters required by regulations

Section 59(2) of the CMA outlines the following requirements to be included in each notice, these include:

- (a) the land affected; and*
- (b) the purpose for which the right of access is required; and*
- (c) the proposed programme of work including the type and duration of work to be carried out and the likely adverse effect on the land or the owner or occupier of the land; and*
- (d) the compensation and safeguards against any likely adverse effects proposed; and*
- (e) the type of permit held or applied for by the person giving the notice; and*
- (f) if the notice relates to access to Crown land or land in the common marine and coastal area, the direct net economic and other benefits of the proposed activity in relation to which the access arrangement is sought.*

The letter included as **Attachment 21** clearly address each requirement set out under this section.

3.8.4.2 Mining Permits

For an approval for a mining permit that would otherwise be applied for under section 23A of the Crown Minerals Act 1991, provide the information requested below:

A copy of the relevant exploration permit or existing privilege to be exchanged for a mining permit that entitles the holder to mine a Crown-owned mineral.

The relevant exploration permits to be partially surrendered / exchanged for a mining permit include exploration permits 60648 (Golden Point) and 60747 (Cumberland). The permits are included as **Attachment 3** to this application.

The name and contact details of the proposed permit participants and the proposed permit operator

Proposed Permit Operator:

Organisation: Reefton Resources Pty Limited

Contact Person: Simon Delander

Phone: s 9(2)(a)

Email: s 9(2)(a)

Postal Address: s 9(2)(a)

Proposed Permit Participant:

Organisation: Terra Firma

Contact Person: Lincoln Smith

Phone: s 9(2)(a)

Email: s 9(2)(a)

Postal Address: PO Box 67, Ngaruawahia, 3742.

A proposed work programme for the proposed permit, which may comprise committed work, committed or contingent work, or both.

A high-level work programme is included below:

Phase 1 – Site Establishment (up to 1 year)

- > Early works including establishing access, portal, lay down, civil works and support infrastructure.

Phase 2 – Development and Construction (1 year)

- > Development of mine declines, drill pads, water & power infrastructure, construction of processing plant

Phase 3 – Mining and processing (6-8 years)

- > Expected to hit minimum annual production rate of 30,000 ounces per year, processing 150,000 tonnes through mine (6-8 years)

Phase 4 – Closure and Rehabilitation (2-5 years)

- > Rehabilitation of site as per agreed closure plan, monitoring and hand over once closure criteria is met (2-5 years)

Evidence of the technical or financial capability of the proposed permit holder to comply with and give proper effect to the work programme.

An economic model is included as **Attachment 22** to this application and demonstrates the financial capability of Rua Gold as the permit holder to give effect to the work programme.

It should be noted that, the Auld Creek resources size and definition, associated opex and capex, are expected to be larger than described in the PEA Report (included as **Attachment 6** as a reference to this application). The PEA is conservative and still being internally

reviewed by Rua Gold at the time of this referral application submission. The current 19,000 m drilling programme in Reefton is designed to add greater confidence to the Auld Creek resource and support the delivery of a Pre-Feasibility Study at the time of the substantive application.

Information about the proposed permit holder's history of compliance with mining or similar permits and their conditions.

The permit holder's compliance history is outlined in Section 1.4 above and included below for ease of reference.

On 31 May 2019, Rua Gold underwent a change of control within the meaning of the CMA, for which the Minister's consent was not sought or obtained. This constituted a breach of the CMA because Rua Gold was, and is, the permit operator for a Tier 1 exploration permit (EP 60491). On 26 February 2020, Rua Gold Limited received a warning letter from NZP&M regarding the breach. The warning letter confirmed that the Minister does not intend to revoke Rua Gold's exploration permit or prosecute Rua Gold for the breach. To the best of Rua Gold's knowledge, it has not otherwise contravened any environmental regulations.

The proposed date on which the substantive application is intended to be lodged (if your referral application is accepted) in accordance with section 42(11).

The intended date for lodgement of the substantive application (should the referral be accepted) is 18 September 2026.

If the authorised person proposes to provide information under section 37 (to the relevant chief executive), the date on which the person intends to provide that information.

No information is proposed to be provided under section 37.

The proposed duration of the permit

The proposed duration of the permit is 30 years.

3.8.4.3 Mining permits for minerals other than petroleum

Map of the area over which the mining permit application is intended to be made, the area in which the surrender of an exploration permit or existing privileges is proposed (which must be the same area as the area over which the mining permit application is intended to be made), and the extent of the resource and reserves to which the development plan relates

The following maps are included as **Attachment 10** to this application.

- > The intended Mining Permit Area;
- > The area related to the surrender of exploration permits EP 60648 and EP 60747; and
- > The extent of the Auld Creek resource.

For minerals other than gold or silver, a report or statement confirming the ownership of the minerals targeted

Land and Mineral Status Reports for the land parcels included within the existing exploration permits (EP 60648 and EP 60747), and subsequently the mining permit area, are included as **Attachment 23** to this application.

Information on whether the application will be for a Tier 1 or Tier 2 permit.

The mining permit is proposed as a Tier 1 permit. The Project meets the definition of a Tier 1 permit under section 2B(e)(i) of the CMA as an underground mining operation.

An estimate of the mineral resources and reserves relating to the project, including a summary on acquisition of the data and the data underpinning the estimate (such as information on sample locations, grade, and geology). For a Tier 1 permit application the resources and reserves relating to the project are to be estimated in accordance with a recognised reporting code such as JORC or NI 43-101.

A Technical Report (*Technical Report on the Reefion Project, New Zealand, Report for NI 43-101 on the Reefion Project, New Zealand prepared by RSC Consultants, dated 27 Feb 2026*) is included as **Attachment 5** to this application. The Technical Report has been prepared in accordance with National Instrument 43-101 - Standards of Disclosure for Mineral Projects (NI 43-101) and Form 43-101F1 and provides a comprehensive review and assessment of all data and data collection procedures for the Project and current mineral resources.

It should be noted that exploration of Auld Creek (in-accordance with existing exploration permits) is on-going, therefore the resource estimates are expected to increase overtime. Therefore, it is likely the in resources estimates will be updated by the intended substantive lodgement date.

An indicative mine plan.

Global mining consultants Mining One were engaged to undertake underground mining study (PEA) with scope covering:

- > Advancing the mine concept design to Preliminary Economic Assessment level;
- > Development of mine plan and schedule; and

- > Entry, ventilation, surface haul roads and stockpile overview.

The PEA is included as **Attachment 6** as a reference to this application.

Mining One worked closely with Reefion based Terra Firma Mining on the underground studies who will support with local mining context, health and safety and operationalising our mine plans (refer to **Attachment 16** to this application). The PEA was completed in March 2026 and was subject to peer review by an independent mining engineer and provides an indicative mine plan.

A high-level overview of the following:

The proposed Mining method;

As outlined in Section 2.2.1.2 of this application, Mining One have selected Overhand Cut and Fill using a combination of cemented and uncemented backfill as the preferred mining method to form the base-case for the mine plan, including the underground mine design and scheduling. Further details of the proposed mining method are included as **Attachment 6** as a reference to this application.

It should be noted that Mining One considered Sublevel Open Stoping with cemented backfill as a possible option but will require further investigation to comprehensively assess and understand possible risks and operational feasibility.

The proposed date for the commencement of mining and estimated annual production;

The indicative date for the commencement of mining is expected to be early 2028 between January and March, subject to FTAA Approval and construction. The Project is expected to process 200 – 250 kt annually.

The concept production schedule prepared by Mining One within the PEA (refer to **Attachment 6** as a reference to this application) indicates the mine will produce approximately:

- > 1.35 Mt of ore;
- > 83 ozt of Au metal; and
- > 10 kt of Antimony metal.

The economic model for the project;

The preliminary economic model for the Project (which is based on anticipated resource from further drilling) is included as **Attachment 22** to this application. This is the model that

has informed the Economic Evidence prepared by Eaquad & Eaquad included as **Attachment 12** to this application.

It should be noted that, the Auld Creek resources size and definition, associated opex and capex, are expected to be larger than described in the PEA Report (included as Attachment 6 as a reference to this application). The PEA is conservative and still being internally reviewed by Rua Gold at the time of this referral application submission. The current 19,000 m drilling programme in Reefion is designed to add greater confidence to the Auld Creek resource and support the delivery of a Pre-Feasibility Study at the time of the substantive application.

The status of or anticipated timing for completing any pre-feasibility or feasibility studies;

Mining One has completed a PEA for the Auld Creek Project. The purpose of the analysis is to evaluate the conceptual mine plan and economic potential of the Auld Creek deposit. The Mining One PEA Report is included as **Attachment 6** to this application as a reference. Rua Gold has engaged Pitch Black Group to complete a PEA related to the processing plant and related surface infrastructure, and Knight Piesold Consultants have been engaged to provide a PEA on the Tailing Storage Facility for the Project which are in the final stages of drafting.

Final Pre-Feasibility Studies have been engaged and will be included in the substantive application (provided the referral application is accepted) in September 2026.

The proposed methods for processing mined material and handling and treating waste; and

Pitch Black have been engaged to undertake the PEA for processing and to evaluate early-stage metallurgical test work. This study work is in final stages of peer review and will advance to Pre-feasibility Study level ahead of a substantive fast track application.

The proposed processing methods include an initial build of a 250 kt per annum plant, with redundancy and flexibility considered in design to facilitate an expansion as mining development expands and exploration potential unfolds. Figures 9 and 10 provide a high level overview of the proposed processing activities and processing plant. As discussed in Section 2.2.1.4 above, the proposed processing operation includes the following activities:

- > Three-stage crushing, with fine ore-bin storage and emergency reclaim;
- > A single-stage ball mill, with flotation cell treating cyclone overflow, producing an antimony/gold concentrate;
- > Separate gravity circuit to treat ball-mill discharge and flotation tails products to produce gravity gold Doré;

- > Gold recovery from the gravity circuit plus flotation concentrate in the range of ~90 - 93%;
- > Antimony recoveries using lead nitrate as an activator in the range of 70-95%;
- > Concentrate dewatering using a thickener and a filter to produce a transportable concentrate; Fand
- > Appropriate tailings-handling facilities (including possible detoxification of cyanates) depending on plant location and underground paste fill requirements.

Knight Piesold Consultants have been engaged to provide a PEA on the Tailing Storage Facility for the Auld Creek Project. This work is currently underway. For the purposes of the referral application the following high-level commentary is provided. The TSF is anticipated to include a Dry Stacked Tailing Facility design which may include waste rock. A water treatment system will be designed in accordance with best practice and technical expert assessment, it is anticipated an active water treatment system will be implemented, however this is subject to further studies, as outlined by Green Road (2026).

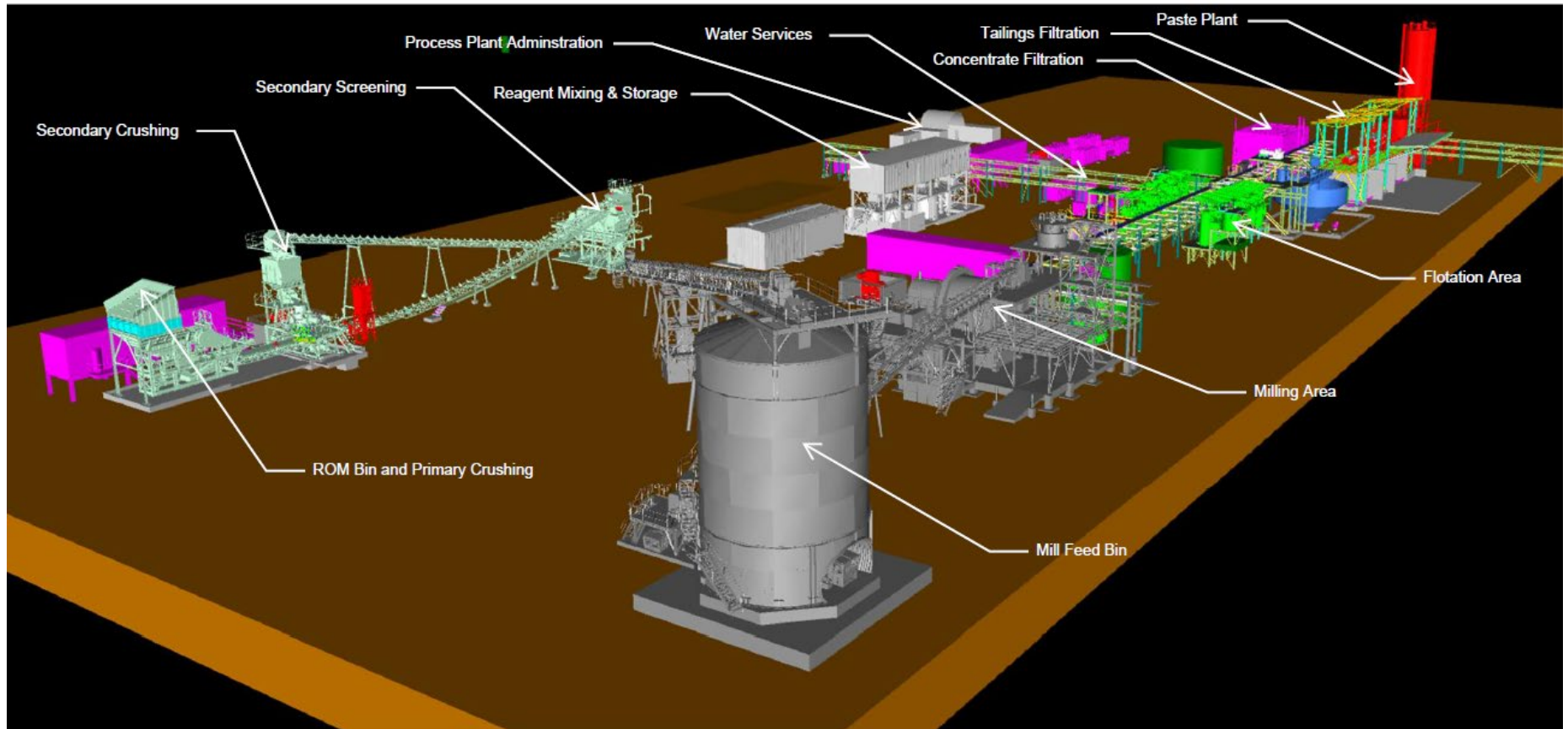


Figure 9: High level design of processing plant



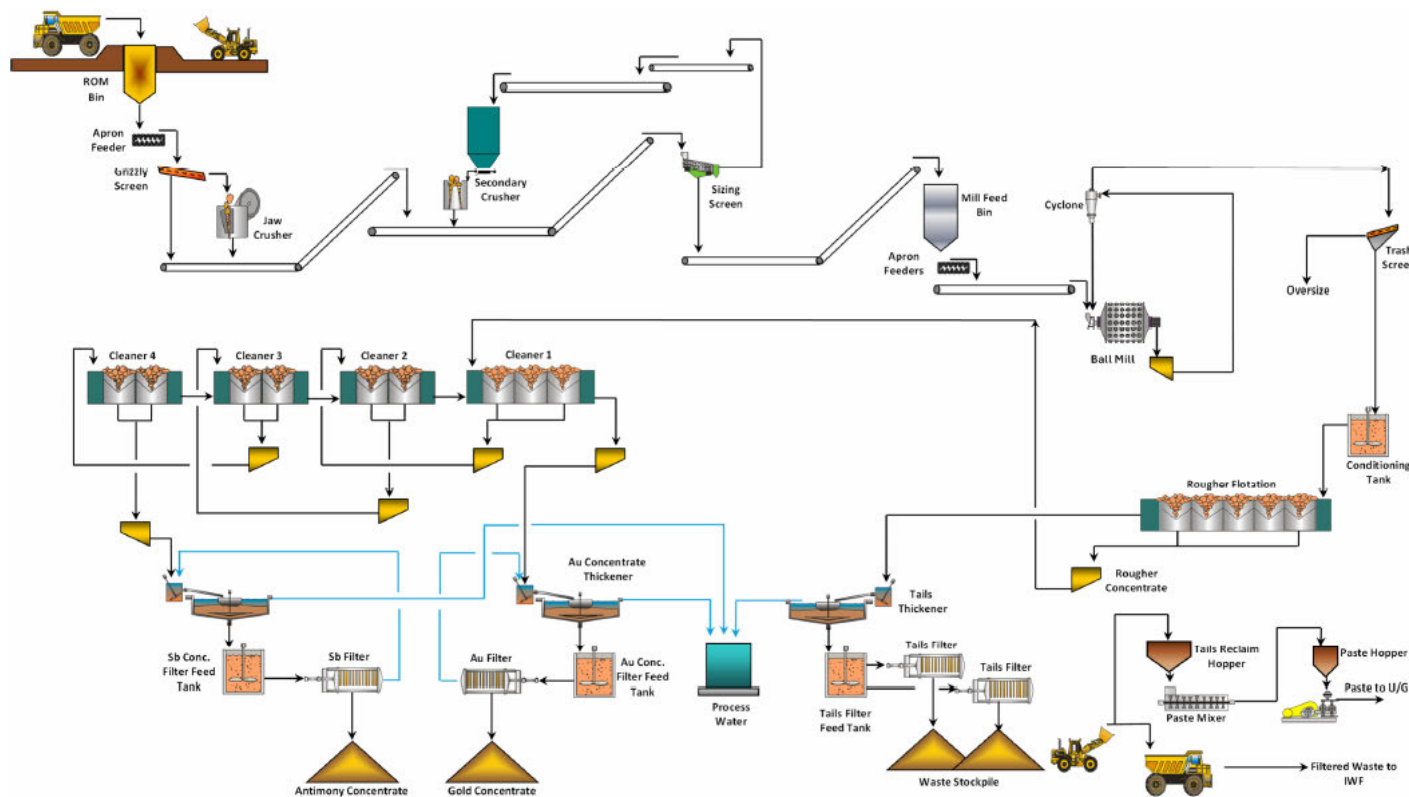


Figure 10: Process flow sheet developed by Pitch Black for the Auld Creek Project



Anticipated plans for mine closure and rehabilitation.

For the purposes of the referral application, the following general closure and rehabilitation objectives, strategies and plans are provided. Please note these plans provide high-level guidance; a detailed and comprehensive closure plan will be developed as part of the substantive application.

Rehabilitation Objectives

A detailed rehabilitation plan for the mine site post-production will be implemented. At a high level, the rehabilitation plan will address the following objectives:

- > To establish a vegetation cover over all disturbed areas;
- > To minimise maintenance requirements following rehabilitation;
- > To protect water and soil resources from the effects of erosion and potential contaminants;
- > To restore disturbed watercourses to a natural and stable condition; and
- > To visually integrate completed structures, landforms, and vegetation into the surrounding landscape.

General Approach to Rehabilitation

The rehabilitation approach is based on minimising disturbance while remaining compatible with safe and efficient day-to-day operations. Disturbance will be limited to the area required to operate the mine, plant, and associated infrastructure.

Rehabilitation will be completed progressively where practicable and will seek to restore the site to a safe and stable condition as soon as practical following disturbance. Landforms will be designed and constructed to integrate with the existing landform character of the surrounding area, with consideration given to long-term stability and visual outcomes.

Key elements of the rehabilitation approach include:

- > Careful design and construction of waste rock storage areas, stockpiles, and other disturbed land to allow integration with the surrounding topography;
- > Progressive stabilisation and rehabilitation of disturbed surfaces;
- > Containment and treatment of contaminants on-site to ensure they do not pose a long-term safety or environmental risk; and
- > Achievement of a suitable and sustainable post-mining land use agreed with landholders and regulators.

Key General Rehabilitation Activities

Key general rehabilitation activities include, but are not limited to:

- > Backfilling of underground stopes and ventilation adits where required for long-term stability and safety;
- > Removal of mining facilities, waste rock storage areas, and rehabilitation of haul roads no longer required for future land use;
- > Removal of unnecessary monitoring, operational, and ancillary equipment at mine closure;
- > Recontouring and stabilisation of disturbed areas to tie into surrounding landforms;
- > Placement of suitable growth media and establishment of vegetation cover; and
- > Rehabilitation of disturbed watercourses and drainage features to stable natural forms.

Closure Phase Activities

The implementation of the closure strategy at the conclusion of mining operations will include:

- > Securing access to mine portals, shafts, and other mine openings for public and environmental safety;
- > Removal of surface infrastructure and ancillary facilities not required to remain under land access or regulatory agreements;
- > Retention of infrastructure or access routes where required by agreement with landholders or regulators;
- > Rehabilitation of stockpiles, waste storage areas, and laydown areas with appropriate vegetation;
- > Removal and restoration of haul roads and access tracks not required for future use; and
- > Management of site drainage and water treatment systems to provide ongoing protection of surface and groundwater.

Landscape Integration and Post-Mining Land Use

Finished landforms will be shaped and rehabilitated so that, once vegetated, they visually integrate with the surrounding landscape and appear consistent with natural landform character. Rehabilitation outcomes will be designed to support the agreed post-mining land use, which is likely to include agricultural, forestry and conservation use.

Post-Closure Management and Monitoring

A rehabilitation management plan will be in place and approved by the regional council as part of the consenting process. This plan will include rehabilitation completion criteria, arrangements for post-closure monitoring, and expectations for maintenance during the transition phase following closure.

Financial assurance and bonding arrangements will be established to ensure rehabilitation and closure obligations are met and will be reviewed periodically. Following completion of rehabilitation and agreement that closure criteria have been satisfied, regulatory approvals may be relinquished and ongoing land management transferred in accordance with agreed land use arrangements.

ATTACHMENTS

Attachment Number	Document Name	Author	Document Version and Date
Attachment 1	Authorisation Letter	Rua Gold	-
Attachment 2	Indicative Site Layout	Wayfinder	24 March 2026
Attachment 3	Existing Exploration Permits	-	-
Attachment 4	Existing Access Arrangements	-	-
Attachment 5	NI 43-101 Technical Report	RSC Consulting Ltd.	27 February 2026
Attachment 6	Underground PEA	Mining One Consultants	April 2026
Attachment 7	Site Access Option Assessment	Stantec NZ	20 March 2026
Attachment 8	Map of Existing Road and Access Tracks	-	-
Attachment 9	Records of Title	-	-
Attachment 10	Mining Permit Area Maps	Rua Gold	1 April 2026
Attachment 11	Antimony Fact Sheet	-	-
Attachment 12	Economic Evidence	Eaqub & Eaqub Limited	17 April 2026
Attachment 13	Consolidated Letters of Support	-	-
Attachment 14	Landscape Assessment	Wayfinder	26 March 2026
Attachment 15	Acoustics and Air Quality Assessment	Tonkin & Taylor Ltd.	27 March 2026
Attachment 16	Safety-Critical Roles and Ground Pre-Conditioning Memorandum	Terra Firma Mining Limited	20 March 2026

Attachment Number	Document Name	Author	Document Version and Date
Attachment 17	Green Road Mining Assessments Summary	Green Road	30 March 2026
Attachment 18	Ecological Technical Memorandum	Ecological Solutions	8 April 2026
Attachment 19	Archaeological Features Map	-	-
Attachment 20	Consolidated Notification of Intent to Lodge Referral Application Letters	-	-
Attachment 21	Notice of Request for Grant of Right of Access	-	-
Attachment 22	Reports Economic Model	-	-
Attachment 23	Land and Mineral Status	-	-