

IN THE MATTER of the Fast-track Approvals Act 2024 (the Act)

AND

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

STATEMENT OF EVIDENCE OF MATTHEW JOHN DALE (ECOLOGY) ON BEHALF
OF KĀTI HUIRAPA RŪNAKA KI PUKETERAKI, TE RŪNANGA O MOERAKI, TE
RŪNAKA O ŌTĀKOU, AND HOKONUI RŪNANGA (KĀ RŪNAKA)

7 SEPTEMBER 2026



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INTRODUCTION

1. This evidence responds to select responses to RFI11. I also provide comments on the adequacy of proposed conditions as circulated 28 August 2026.
2. The bulk of my evidence focuses on the proposed compensation package for managing residual effects on lizard populations. In my view, this remains the most significant ecological impact of the current proposal and has yet to be adequately addressed.
3. As well as the ecological impact on lizard populations, the proposed activity is likely to have significant cultural impacts as outlined in the previous evidence of Jade Watkin.

RFI-11 Q10 Ecology – Lizards

4. While the information provided does give further insight around alternative approaches and the decision process used to establish MGL current position, the proposed alternative approach does not provide any substantial reduction in residual effects beyond the original Application. For example, the moderate increase in the overall area of pest exclusion sanctuaries and the release of salvaged lizards into those sanctuaries is offset by a significant decrease in the number of lizards to be salvaged. Although it is acknowledged that there is a higher chance of survival for those lizards that are salvaged, this is again offset by the reduction in the total number of salvaged lizards.
5. The proposal to focus salvage effort on Kowarau gecko and Southern Grass skink does have some merit, however the proposal to not salvage any McCanns skinks, even those that have been captured incidentally when targeting other species, creates an unnecessary increase in residual effects.
6. The Applicant has not provided sufficient evidence to explain why the area of fenced reserves cannot be significantly increased to reduce residual effects. In my view, an increase in the size of the reserve commensurate with the effects on lizards with regards to be scale and significance provides the most certainty in managing residual effects, however this approach has not been put forward despite consistent feedback from a number of experts to that effect.

7. It is unclear if the reluctance to establish meaningfully larger fenced sanctuaries is due to budgetary constraints, a desire to keep land open for potential future mining, or something else; however it remains a significant obstacle in adequately addressing residual effects.
8. While the current proposal is still inadequate in reducing residual effects on lizards, the detail provided in the RF11 (Q10) response does provide some insights into what a more adequate compensation package might look like with regards to lizards if the original salvage numbers (102,000) are used as a baseline. This is based on the assumption that the original salvage numbers (32,500 Kowarau geckos, 1,800 Southern Grass Skink, and 76,800 McCanns skink) were calculated using a robust and defensible methodology.
9. It is my opinion that the Applicant should aim to undertake targeted salvage of at least the same amount of Southern grass skink (1,800) and Kowarau geckos (32,500) as previously suggested, while all incidental catches of McCann's skinks should also be salvaged. This should be done in conjunction with increasing the size of the fenced sanctuaries to provide sufficient carrying capacity for these lizards.
10. To provide a starting point for the estimation of what an appropriately scaled fenced sanctuary might look like, we can use the numbers provided by the Applicant in the RF11 response (Q10). The Applicant has estimated that the total sanctuary area of 81ha, will provide carrying capacity for 24% of the 32,000 Kowarau geckos, and 44% of the 1,800 Southern grass skink that were originally to be salvaged. By using this estimate of carrying capacity, we can extrapolate that a total fenced sanctuary area of **342ha** would be required to provide sufficient habitat for 32,000 Kowarau geckos.
11. This number can be used as a starting point for an appropriate sanctuary scale, rather than being the final number. The required size of the fenced sanctuaries may be reduced from this starting point by undertaking further actions, including targeting sanctuaries around areas with proportionally more Kowarau gecko and Southern grass skink habitat (supported by detailed habitat surveys) than the currently proposed 81ha area, or habitat enhancement (rock stacks, planting of food species etc).

12. Although I agree that salvage should be primarily focused on the more threatened Kowarau gecko and Southern grass skink, it does not mean salvage of McCann's skinks should be completely ignored. There is significant habitat overlap between McCann's skink and the other two species, and it would be expected that there will be high numbers of bycatch of McCann's skink using pitfall traps and G-minnow traps. These individuals can be salvaged and released with minimal increased cost and time to the Applicant and further reduce the residual effect of the proposed activity.
13. It is my opinion that any lizards outside of the fenced sanctuaries are at significant risk to predation from mice due to mesopredator release following the proposed pest control, therefore any salvaged McCann's skinks captured during Kowarau gecko and Southern grass skink salvage should be translocated alongside them into fenced sanctuaries. If numbers of incidentally captured McCann's skinks exceed the estimated carrying capacity of the fenced reserves, they may be released into unfenced predator controlled areas, but would not be considered as part of the package to reduce residual effects.
14. Although the shift towards releasing salvaged lizards into the fenced sanctuaries provides better outcomes for individual lizards, it also may create issues around the timing of proposed salvage and subsequent release. Suitable release conditions within any of the fenced sanctuaries requires several years of construction, predator eradication and monitoring before salvaged lizards can be released. Since land clearance/mining operations can't be undertaken until after lizard salvage has occurred, and salvage can't be undertaken unless there is a suitable release site, it may take up to 5 years for these conditions to be met, and it is unclear if the Applicant has factored this into its decision making. Further information is required to understand how this issue will be managed.
15. Although the scale and complexity of impacts and proposed offsets/compensation is significant, it is not logistically impossible or without precedent to reduce residual effects to a much lower level than what is currently proposed by the Applicant. For example, Oceana Gold Ltd (OGL) has worked closely with Kā Rūnaka experts

for the past 18 months to develop a compensation package for residual effects on lizards for a similar scale of effects than what has been outlined by the Applicant.

16. This package has been developed as part of an effects management plan to address predicted impacts on lizards from the proposed MP4 mine expansion and includes a fenced predator-free sanctuary of 252ha as the centrepiece of a wider offsets and compensation package. This package also incorporates landscape-scale predator control and habitat enhancement on a similar scale to what has been proposed by the Applicant in this case.
17. To summarise, it is my view that the current combined fenced sanctuary area of 81ha is inadequate to address residual effects on lizards. Without appropriately scaled compensation and targeted habitat protection/enhancement, a fenced sanctuary area of 342 ha is required to compensate for these impacts. If targeted habitat protection/enhancement can be achieved within the fenced sanctuary, the total area required may be reduced somewhat, but it will still need to be significantly larger than what is currently proposed.

WILDLIFE ACT AUTHORITY PROPOSED CONDITIONS

18. Overall, the Applicant's proposed lizard compensation package is inadequate to sufficiently reduce residual effects, and it is my view that this deficiency cannot be overcome by finessing consent conditions within the current scope of the proposal.
19. It is still unclear how the Applicant is intending to manage the timing of releasing salvaged lizards into the fenced sanctuaries if the predator control has not been undertaken (see Paragraph 14). Further clarification is needed on this point, and this should be included in consent conditions.
20. The revised conditions in Schedule 3 (Condition 5) do not provide for mana whenua involvement if changes to any of the management plans are required. There is similarly no requirement for mana whenua to be involved in any decision around euthanasia of wildlife as outlined in Schedule 3, Condition 24.

RFI-11 Q1 Water Resources Impact Assessment Summary

21. The further information provided by the Applicant gives an appropriate level of baseline information on the water quality and ecology of the receiving aquatic environment.

RFI-11 Q5 potential adverse impacts on Ardgour and Bendigo Aquifers

22. The further information provided by the Applicant provides a sufficient level of information to understand potential effects on the aquifers, however a portion of the technical detail with regards to groundwater modelling is outside my area of expertise.

RFI-11 Q8 Sulfate and Nitrate Compliance

23. The Applicant has responded appropriately to the issues raised in the hearing and expert conferencing.

RFI-11 Q11 Spring Annuals

24. This topic is outside of my area of expertise and, as such, I will not be commenting on any details contained in the RF11 Q11 response.

Matthew John Dale

7 September 2026