

**BEFORE THE HEARING PANEL APPOINTED BY WAITAKI DISTRICT
COUNCIL**

UNDER the Resource Management Act 1991

IN THE MATTER of the Proposed Waitaki District Plan

Hearing Topic: Hearing Stream 1 – General / Strategic Directions / Mana
Whenua

**EVIDENCE OF ALISON PAUL FOR OCEANA GOLD (NEW ZEALAND)
LIMITED**

Dated 4 August 2026

QUALIFICATIONS AND EXPERIENCE

- 1) My name is Alison Claire Paul.
- 2) I am Senior Vice President Legal and Public Affairs of Oceana Gold (New Zealand) Limited (**OGNZL**).
- 3) I hold a Bachelor of Laws and Arts from Auckland University, New Zealand. I have more than 20 years of experience in legal and corporate governance for the mining and metals industry and previously spent 13 years in the construction industry. I have been involved in policy and plan change processes and consenting for expansions and developments across OGNZL's New Zealand mining activities, including ongoing mine-life extensions at the Macraes Operation both within the Waitaki District and the Dunedin City, at Reefton in the Buller District through its mine life and closure, and at Waihi in the Hauraki District. That includes consenting under the Resource Management Act 1991 (**RMA**) and Fast-track Approvals Act 2024 (**FTAA**).

INTRODUCTION

- 4) OGNZL is submitter 295 on the Waitaki District Council (**Council**) Proposed District Plan (**Proposed Plan**).
- 5) Under the current Waitaki District Plan (**Operative Plan**) there is a Macraes Mining Project Mineral Zone which applies to the area of land that OGNZL's predecessor, Macraes Mining Company Limited, controlled when the Operative Plan was notified (late 1990s). The zone boundaries are very outdated. OGNZL's primary submission supports the Council's proposed Special Purpose Zone: Macraes Mining (**Macraes Mining Zone / the Zone**) and seeks further updates to the zone.
- 6) I will not comment in detail on the complexities that the 'plan stop' exemption process has introduced for the Macraes Mining Zone, except to note:
 - a) It is difficult to understand how integrated planning will be achieved. Ordinarily OGNZL would participate across all chapters of the Proposed Plan that will be relevant to mining within the Zone, to ensure that those provisions and the Zone provisions will function cohesively and in a balanced manner. Instead in this process OGNZL is working on Zone provisions in a vacuum, without any certainty as to when the 'out of scope' provisions will be considered, and without any certainty as to the

extent to which the planning benefits that might be available to support OGNZL's ongoing mining activities in the Waitaki District via the rules in the Zone might be frustrated by the provisions of other parts of the Proposed Plan that are not being progressed at this time.

- b) OGNZL wants this Zone to be up-to-date, workable and enduring for the usual 10-year cycle of a District Plan, to enable us to plan and invest with certainty into mine development into the 2030s and beyond. The Council should want that certainty of investment too, given its benefits to the District. However, it is not clear that this Proposed Plan process, and the costs it imposes on OGNZL, other submitters and ratepayers, will be time and money well spent given the context of significant further legislative change and regional/local government reform.
- c) Once operative, I understand the Zone will be administered through a hybrid planning framework under which parts of the Proposed Plan will have legal effect, while other provisions will remain unresolved and the corresponding provisions of the Operative Plan will continue to apply. This complexity will continue for an indefinite period while the government replaces the RMA and new legislation is enacted and implemented. It presents a very uncertain basis upon which to plan and make major investment decisions for a large business like ours.

SCOPE OF EVIDENCE

- 7) I have been asked to prepare evidence describing the nature of OGNZL's mineral interests in the Macraes area, including within the boundary of Waitaki District. I have also been asked to describe some of the operational realities of mining so that the Hearings Panel can understand why the Proposed Plan should provide for mineral development in general, and why a Macraes Mining Zone is critical to OGNZL, contributes to the local, regional and national economies, and should provide for the ongoing development of the Macraes Mine (**Mine**).
- 8) My evidence will be most useful for the Stream 3A Macraes Mining Zone hearing in October 2026, but I am providing it for the Stream 1 hearing in August 2026 so that OGNZL's overall position is clear to the Panel and other submitters from the outset.

THE MACRAES MINE

Resources

- 9) Waitaki District hosts nationally significant gold resources, including those that are within the area over which OGNZL has mineral permits from the Crown. These areas, together with landholdings within the Dunedin City District form the location of the Macraes Mine. Attached and marked "A" is a map showing the extent of OGNZL's current mineral tenements in the area, and OGNZL's land ownership.
- 10) The Mine is the first continuously operating mine in New Zealand to extract 6 million ounces of gold. The majority of OGNZL's mining at Macraes since the commencement of development in 1990 has been in the Waitaki District, based around the Round Hill, Southern, Innes Mill, Frasers, Golden Point, Deepdell North and South, and Golden Bar pits, as well as the Frasers Underground mine and more recently the Golden Point Underground Mine. From 2013 onward mining has straddled the local authority boundaries, with Coronation and Coronation North pits extending into Dunedin City.
- 11) OGNZL has an active exploration programme to identify and define further gold resources that can be developed as part of the Mine. It is therefore important that the Proposed Plan contains appropriate provisions that enable the benefits derived from mining to be realised.

Benefits

- 12) I am not an expert witness on economics. But below I summarise a variety of matters relevant to a consideration of the Macraes Mine's socio-economic footprint, drawing partly on economic analysis which has been prepared for publication¹ (and can be made available at the SPZMM hearing) regarding the benefits of the continued operation of the Mine if the company's Macraes Phase 4 Project (**MP4**) is consented under the FTAA:
 - a) Macraes is the largest gold mine in New Zealand. It has produced more than 6 million ounces since mining commenced in 1990 and accounted for 59% of all the gold produced in the country in 2024.

¹ 'Economic Assessment of MP4' Shamubeel Eaquad, CFA, July 2026

- b) The Mine has been, and continues to be, a significant contributor to employment, incomes and expenditure for north-east Otago, metropolitan Dunedin and the Otago region.
- i) The Mine directly employs around 760 people and supports around 2,600 jobs in total across New Zealand once suppliers, contractors and the spending of those workers are counted. The average salary for Mine employees is over \$100,000 per annum compared to around \$80,000 in Otago and nationally, and the workforce lives mostly in Waitaki and Dunedin, so income stays and circulates in the local economy. Total jobs from the Mine (direct [mine workers], indirect [suppliers] and induced [the income effect of the direct and indirect jobs]) account for around 13% of jobs in Waitaki and around 1.4% of jobs in Dunedin. Without MP4 employment winds down from around 2030, but MP4 sustains it to 2039.
 - ii) Suppliers to the Mine are spread across New Zealand with 20% of spending in the Otago region, and many suppliers have local operations. Spending on local suppliers adds considerable economic benefit to the local economy.
 - iii) The Mine also contributes to the “social fabric” of local communities via staff, contractors and their families belonging to service clubs, sports clubs, and other voluntary organisations. As well as fulfilling leadership roles and making other contributions within the community, staff, contractors and their families help provide the critical mass to underpin these organisations’ ongoing sustainability.
 - iv) Additionally, the Mine has emergency response personnel on site, who respond to community emergencies as and when required. The Macraes emergency response team are also an official co-response unit (**CRU**) for the St John Ambulance southern region. As such, the CRU is dispatched as a first response unit by the ambulance communications centre to attend road accidents. In this capacity it is responsible for an area that includes all of the Macraes-Hyde road between SH85 and SH67, SH85 up to Morrisons and Dunback, the Nenthorn Valley, Middlemarch and Hyde. Further, OGNZL provides emergency responders to civil defence emergency services operated by the Otago Civil Defence Emergency Management

Group (a group administered and co-ordinated by the Otago Regional Council, in partnership with all local authorities in Otago).

- c) The Mine also contributes to local government revenue. OGNZL paid around \$640,000 a year in rates (excluding GST) to the Waitaki District Council in 2025/26. That is around 1.6% of the Council's total rates revenue from a single ratepayer.
- d) At a national level, the Mine returns revenue to the Crown through royalties, company income tax and PAYE. MP4 returns between NZD 0.5 billion and 1.4 billion to the Crown over its life.
- e) The Mine has made and will continue to make a considerable contribution to New Zealand's gross domestic product and exports. For example, MP4 adds between NZD4.5 billion and 7.3 billion of gold exports, an average of \$320 to \$520 million a year. That is equivalent to between a tenth and a sixth of the Government's Minerals Strategy² goal of \$3 billion in annual mineral exports. MP4 adds around NZD2.4 billion to GDP through direct and indirect effects and around NZD3.1 billion including the induced effects of workers' spending. Around a quarter of the GDP effect accrues in Otago, including \$330 million in Waitaki District, equivalent to around 1.5% of the district's economy a year while MP4 is active. Accordingly, the Mine has positive regional economic impacts for the wider Otago region and has helped diversify and sustain the regional economy over decades.

OPERATIONAL ISSUES AND THE PROPOSED PLAN

- 13) I have been asked to explain some of the operational and practical issues which underpin OGNZL's submission on the Proposed Plan, and its support for a Macraes Mining Zone.
- 14) To the extent that we can, we seek to internalise the effects of mining. We typically own the land upon which major mine-related activities (such as the construction of pits and waste rock stacks, processing, tailings disposal) occur, and we also own surrounding land, thereby creating an effective buffer between our active mining activities and our neighbours. After

² A Minerals Strategy to 2040 <https://www.mbie.govt.nz/building-and-energy/energy-and-natural-resources/minerals-and-petroleum/strategies/a-minerals-strategy-to-2040>

decades of seeking and operating under resource consents concerned with a wide range of amenity values, it is our experience that this approach generally works well and means that ordinarily we do not have issues with effects such as noise, vibration from blasting, dust, lighting and so on.

- 15) However, there are some effects that cannot be fully internalised. For example, some aspects of the mine are clearly visible from adjacent properties or public roads, and sometimes it is necessary to temporarily or permanently close and relocate roads where the road alignment coincides with the necessary location of a pit or other infrastructure. When this happens we are required to ensure the adverse effects on people are appropriately managed.
- 16) Critical to OGNZL's position in these hearings is the fact that mineral resources are inherently fixed in location. The location of gold is fixed by geological processes over which we have no control and if we want to access and use those resources we can only do so in the places where they exist. We know that they exist along the Hyde-Macraes shear zone within the Macraes Mining Zone and potentially beyond. These locational constraints mean the effects of mining on other values co-located with the mineral resource are often inevitable. Effects can be and are mitigated, minimised, offset and compensated, but cannot be avoided. The only way to avoid those effects is to forgo mining entirely, with the consequence that the substantial benefits of mining are also forgone. It is important that the Proposed Plan recognises this reality.
- 17) An example of co-located values is heritage. Modern mining often coincides with pre-1900 mining items, areas and features. OGNZL regularly obtains archaeological authorities under the Heritage New Zealand Pouhere Taonga Act 2014 to enable contemporary mining to modify an archaeological mining site, or to investigate and record a site before it is removed by our activities. We also operate under Accidental Discovery protocols to protect unexpected discoveries, for instance four moa bones that were found while digging a pit wall in 2022 and, following consultation with local runaka, archaeological and museum professionals, were protected and removed from site. The Proposed Plan must have provisions that allow mining activities to navigate through those co-locational issues.
- 18) Another aspect of unavoidable impact relates to the end use of land once mining has finished and an area is rehabilitated. In the case of pits, these

may be fully backfilled and restored to their former farming use, although generally this is impractical and uneconomic. More typically pits are partly backfilled and then allowed to fill with water. The result is that the final land use is different from what it was pre-mining. In the case of waste rock stacks, these are progressively contoured, topsoiled and revegetated. Our experience has been that the local community likes to see the stacks returned to farming use. For that purpose we have rehabilitated several stacks around the mine with suitable pasture seed mixes which in time allow the stacks to return to grazing use. At the same time, the rehabilitated stacks can provide new habitat, and we have successfully created new habitat for desirable native plant and animal species within some of our stacks. While mine rehabilitation can deliver a range of positive outcomes such as landscape integration and improved biodiversity, it cannot restore land to a condition identical to the pre-mining state. The new landforms and habitat will always be different to a greater or lesser extent than that which previously existed.

- 19) Similarly, where minerals are located within or near ridgelines or other notable landscape features, it is not possible to entirely avoid impacts on those features when developing the resource. Instead, it is appropriate that the modified landscapes created by the pits and waste rock stacks are shaped and contoured to fit into the surrounding landscapes. We do this in consultation with landscape experts and have achieved good results.
- 20) A further area where some impacts are unavoidable is roading. Mine development has required roads to be moved at several places. For example, the Macraes-Dunback Road has been realigned several times over the years to allow earthworks, without compromising safe public traffic movements. These roading changes are always done in conjunction with the Council's traffic engineers, and subject to statutory approvals.

SPECIAL ZONING

- 21) As previously mentioned, the Operative Plan contains a special zone created to recognise that mining is the predominant land use within the Mine area and to facilitate mining. OGNZL is seeking to update the boundaries and provisions of this existing special zone. It is highly desirable to have an effective Macraes Mining Zone which enables mining on land we own or have an interest in, and over which we have the right to mine issued by the

Crown in minerals permits, subject to reasonable provisions addressing the unique characteristics, operational requirements, environmental effects, and rehabilitation obligations associated with mining. Without this in place we find that convoluted, expensive resource consent processes drive inefficient mine development.

- 22) In the absence of clear performance and rehabilitation standards designed with a focus on mining, we get caught up in resource consent processes for very specific mine elements, where the same issues are addressed time after time, with the same outcomes. It is an inflexible, generic process which ties us into particular mine element footprints and designs which are difficult, if not impossible, to modify within the timeframes the mining schedule dictates.

CORPORATE ENVIRONMENTAL RESPONSIBILITY

- 23) OGNZL operates the Mine within the framework of our Group Environment Policy. A copy of the policy is attached and marked "B".
- 24) In all our operations in New Zealand and internationally³ we strive to make an overall positive contribution to the environment. We avoid, remedy and mitigate adverse effects. We operate efficiently to maximise benefits, reduce wastage and unnecessary costs (both financial and environmental) and continually improve our environmental performance. Over 36 years of operations at Macraes, OGNZL has demonstrated it is able to operate a large mine in a way which respects the environment within which we operate.
- 25) Mining cannot entirely avoid some adverse effects, and there must inevitably be changes to things such as landscape, biodiversity, and end-of-mine land use. However, these effects are always taken seriously. Appropriate mitigation, rehabilitation, offsetting and compensation measures are always used to achieve sustainable management outcomes, and these can deliver positive outcomes after mining ends.

CONCLUSION

³ In addition to the Macraes Mine, OGNZL currently operates the Waihi Mine and is finalising mine closure in Reefton. OGNZL's parent company OceanaGold Corporation also operates producing mines in the Philippines and in the USA.

26) OGNZL has successfully mined at the Macraes Mine for over 36 years.

Over that time the Mine has contributed enormously to the Waitaki District, regional and national economies. That contribution is set to continue as we further develop the Mine. OGNZL has demonstrated the ability to operate a large mine in a responsible way. This includes appropriately managing unavoidable effects where they arise.

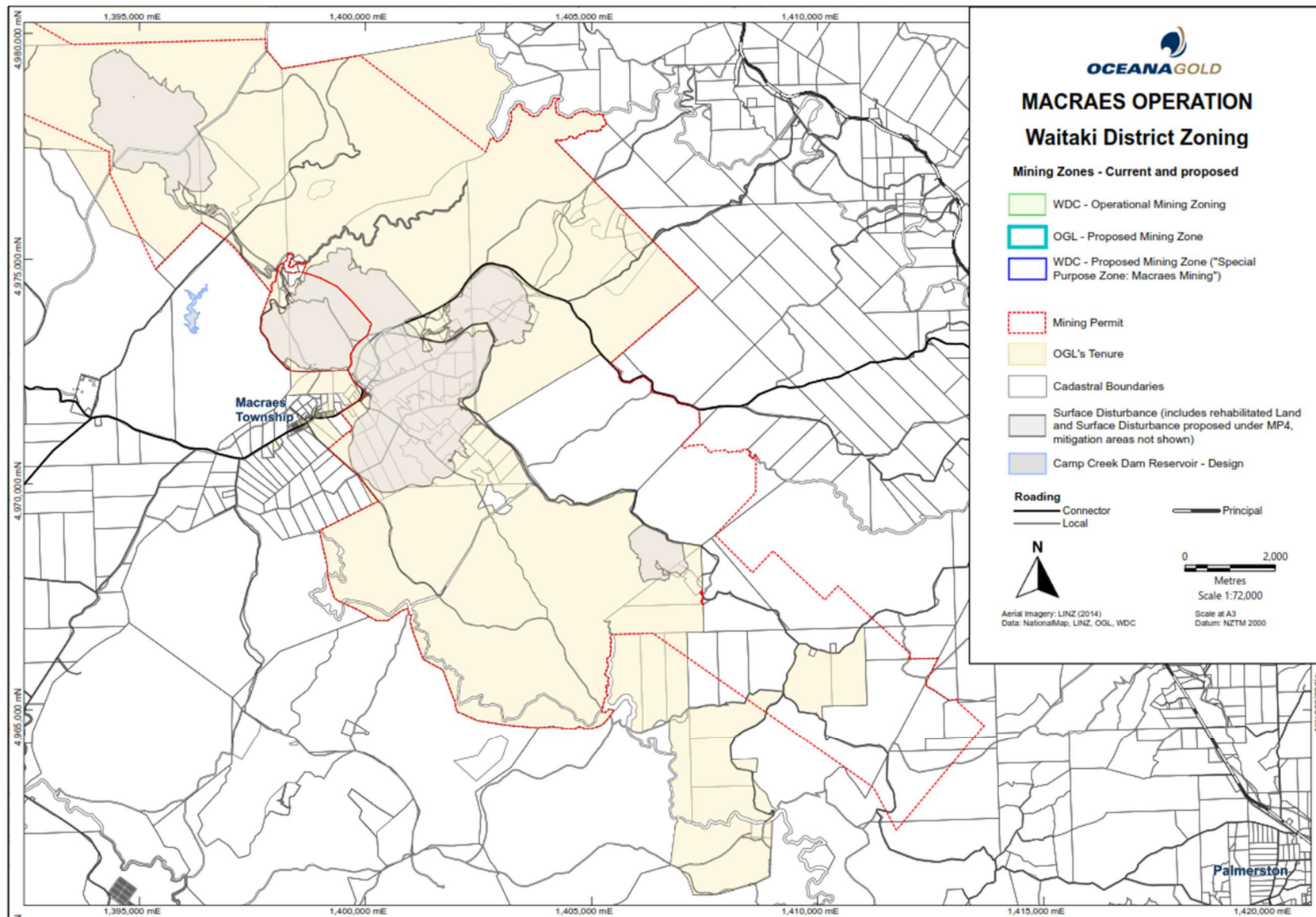
27) It is important that the provisions of the Proposed Plan which could inappropriately inhibit development of the mineral resource are addressed as suggested in our written submissions, and that the Macraes Mining Zone and other Proposed Plan and Operative Plan provisions function cohesively to enable responsible mining.

DATED this 4th day of August 2026



Alison Paul

ATTACHMENT A



ATTACHMENT B



ENVIRONMENT POLICY

OceanaGold is committed to responsible environmental management across all our business activities including exploration, all stages of the project development cycle, mining operations and closure.

We strive to deliver on our commitment to responsible environmental management by:

- Protecting the environment, preventing pollution and avoiding or mitigating impacts which arise from operations related activities on local communities and the environment.
- Contributing to the conservation of biodiversity by:
 - Respecting designated protected areas, including not exploring or seeking to develop new mining operations in any designated World Heritage Area.
 - Supporting, developing and implementing inclusive and transparent processes for integrated land use planning.
- Managing our impacts on water quality and our use of freshwater responsibly.
- Ensuring our mines plan for the social and environmental aspects of closure during their operating life and have adequate financial and technical provisions to meet all closure obligations and post closure commitments. To this extent we will:
 - Maintain and implement closure and rehabilitation management standards which are regularly reviewed and aligned to the requirements of leading globally recognized closure practices.
 - Collaborate with stakeholders in relation to closure planning and management.
 - For new mining projects, include closure and rehabilitation requirements during the project design.
- The safe and responsible management of Tailings Storage Facilities (TSF) throughout their life cycle (including closure) by avoiding and mitigating potential harm to the environment, our workforce and affected peoples and communities. To this extent we will:
 - Align TSF design, development and operations with the International Commission on Large Dams (ICOLD), applicable laws and regulations relevant to our operations, and the Global Industry Standard on Tailings Management (GISTM).
 - Not dispose of tailings using riverine or shallow submarine methods or undertake any new construction of upstream TSFs.
- Minimizing the use of cyanide at each operation and managing all aspects of cyanide use, transport, handling, usage and disposal, in alignment with the principles of the International Cyanide Management Code (ICMC).

We will strive to achieve our commitments by:

- Ensuring compliance with host country environmental laws, as a minimum, and alignment with internationally accepted standards.
- Identifying, evaluating and managing of environmental impacts and risks due to our activities and products.
- Applying the mitigation hierarchy to avoid, minimize, restore/rehabilitate, or offset our environmental impacts.

- Establishing measurable objectives and targets for environmental performance.
- Providing training, education, resources, information, and opportunities for our workforce to support and drive environmental performance improvements across our business activities.
- Continuously reviewing and striving to improve our environmental management system and performance.
- Maintaining transparent communication, engagement, and collaboration in relation to our environmental performance and management of risks with internal and external stakeholders, including:
 - Our communities.
 - Suppliers and contractors.
 - Regulatory authorities.
 - Industry bodies and recognized research institutes.

These commitments are consistent with OceanaGold's Purpose, Vision and Values, are integral to all aspects of our business, are approved by the Board of Directors, and are promoted and championed by the Executive Leadership Team.



Gerard Bond
Chief Executive Officer

September 2024