



Memorandum

Date: 27 July 2022

To: Leigh Robcke, Senior Project Planner, Hauraki District Council

From: Robert Quigley, Director, Quigley and Watts Ltd

Subject: Request for further information from applicant regarding draft SIA for Waihi North

Introduction

Hauraki District Council has asked Robert Quigley of Quigley and Watts Ltd to advise on whether further information is required to understand what is being proposed and the potential social effects which might arise from the Waihi North Project.

Hauraki District Council provided WSP Global's '*SIA Report Final*' dated June 2022 about the potential social effects of the Waihi North Project. The report also had four appendices:

- Appendix A – A review of statutory and non-statutory policies and plans
- Appendix B – Baseline data about communities of interest
- Appendix C – Engagement report
- Appendix D – Projected operational employment needs
- Appendix E – Properties identified as potentially affected by the Waihi North Project.

Hauraki District Council also provided full access to all relevant AEE documents, of which I have also read and considered the following assessments and management plans:

- Oceana Gold (2022). Part Ec. Hauraki District Council – OceanaGold (New Zealand) Limited – Land Use Consent Conditions.
- Beca (2022) Air discharge assessment of Waihi Facilities
- Beca (2022a) Air discharge assessment of the Wharekirauponga Underground Mine
- Tonkin and Taylor (2022) Technical review of air quality assessments
- Oceana Gold (2022). Air quality management plan
- Stantec (2022) Transportation assessment
- Sense Partners (2022). Economic assessment
- Greenaway (2022). Recreation and tourism assessment
- Marshall Day (2022). Assessment of noise effects
- Oceana Gold (2022) Noise management plan – Waihi
- Oceana Gold (2022). Rehabilitation and closure plan including Waihi North.

I have also read and considered the following parts of the application:

- Part A – Overarching assessment of environmental effects
- Parts E, Ea, Eb and Ec – Proposed resource consent conditions
- Part F – Authorisation of existing mining activities under the RMA
- Part G – Pre-lodgement consultation report.

I visited Waihi and the neighbourhoods associated with the project on Friday 5 May 2022.

Requests for information

1. *Section 1.2 Assumptions and exclusions.* In respect of the closure of the Waihi North Project, the social impact assessment states: *An assessment of the implications of the closure of the proposed WNP is not included in this SIA as this is within the ambit of the broader decommissioning and closure requirements of the Waihi Mining Operations. The preparation of a Rehabilitation and Closure Plan has been identified as a condition of consent. This plan is required to include an assessment of any risk posed to the environment and neighbouring communities in the event of closure.* This is also stated in section 6.2.4 (page 43). The Rehabilitation and Closure Plan relates to a suite of physical actions and processes to provide for closure and rehabilitation ahead of schedule, and iteratively during the life of the mining activities to manage/mitigate environmental risk (and produce landscape/open space amenity). This Plan does not address social issues for example, housing, job security or business reliance. Therefore, please assess the potential social effects of 2038 closure, or prior closure for other reasons, in the SIA.
2. *Section 6. Assessment.* The SIA explains that OGNZL have an existing SIMP which provides the framework for assessing social effects of their mining activities, and that *over and above the social mitigation identified, WSP have recognised the requirement to review and update this SIMP to ensure inclusion of the WNP and any additional monitoring requirements relevant to this project.* It is unclear how the potential effects identified, and mitigations that are proposed in this SIA relate to the SIMP (and the monitoring currently undertaken). Please provide an explanation of the relationships, and how this is intended to be updated, replaced, or incorporated, and in doing so explain how this is reflected in the proposed conditions.
3. *Section 6.2.4 Increased business reliance on mining.* Given the closure of mining in Waihi has been excluded from the SIA, this section becomes more important. Page 42 of the SIA states: *The outcomes of the two business surveys are consistent with the 2019-2020 SIMP annual monitoring data which shows from an analysis of turnover estimates that only 2-3% of local businesses receive more than 50% of their revenue from OGNZL (Appendix B).* Please describe the potential social effects for local and regional businesses, and for those businesses with greater than 30 per cent reliance on Oceana Gold.
4. *Section 6.2.4 Impact on business reliance on mining.* Page 42 states: *Continued SIMP monitoring will be valuable to analyse trends and identify changes in respect of local business reliance on the mine.* Can you please explain what the end purpose or outcome might be of this monitoring? The concluding mitigation for this section is *Regular interface between OGNZL and business community.* Can you please explain how this is proposed to mitigate reliance on mining?
5. *Section 6.2.3 Social upliftment from increased business activity and indirect employment opportunities and Section 6.2.5 Increased demand for housing.* The multiplier from direct to indirect jobs appears high (3.69), especially compared to Eaqub's evidence¹ for Project Martha which was 470 indirect jobs on top of 350 direct jobs (ratio of 1.34). Please explain the basis/rationale for the high ratio used in Appendix D, compared (for example) with the approach taken for Project Martha.

¹ [Statement of evidence of Shamubeel Eaqub for Oceana Gold \(New Zealand\) Limited, 16 October 2018.](#)

6. *Section 6.2.5 Increased demand for housing.* The required housing is calculated from the direct workforce alone (292 workers averaged over the life of the project). This makes the direct workforce just 22 per cent of the total workforce generated by this project (292 direct + 1,059 indirect). This appears a substantial under-estimate. Please include the indirect workforce of over 1,059 workers (averaged over the life of the project) in the assessment of housing need.
7. *Section 6.2.5 Increased demand for housing.* The pre mitigation effect is identified as high, and the assessment states that *Mitigation has been identified that, if implemented, will result in reducing the significance of this impact to high.* The proposed post-mitigation includes undertaking a workforce accommodation assessment 6 months prior to commencement of the construction and operation phase. This is not listed in the Conditions, and it is unclear how this is proposed to address/mitigate the effect identified. In contrast, the conditions list a workforce accommodation strategy (Conditions 102 to 106). Please clarify the suite of mitigations and conditions proposed to address the *high* effect identified.
8. *Section 6.3.4 Air quality.* The three air quality reports all have different mitigations proposed. The SIA says: *With the implementation of mitigation measures identified by the air quality specialist the risk is not expected to exceed relevant standards and the overall significance is therefore considered to be low.* Please confirm if the mitigation relied upon includes those from all three reports, particularly those from Tonkin and Taylor (2022).
9. Section 6.5.3 refers to an SIA for the risk of Dam Breach. Please provide that SIA for review.
10. *Section 7.1.1 Way of life; mitigation* and *Section 7.2.1 MOU with recreational parties.* Please clarify whether it is intended that the MoU is for OGNZL to replace the facilities and identifying alternative routes for the Nugget Multisport event. At present the MOU is about 'exploring options' and 'identifying the way forward.' No conditions are proposed to require the MOU, or its implementation. Please address this accordingly.
11. Sections 7.2 and 7.3 describe several mitigations. Please cross reference to the proposed conditions.
12. The SIA does not cover hazardous substances. Please describe perceived or actual social effects arising from hazardous substances.

Thank you for the opportunity to comment at this stage.

Robert Quigley



Director, Quigley and Watts Ltd