

**Before the Environment Court
at Christchurch**

ENV-2024-CHC-37

**I Mua I Te Kōti Taiao o Aoteroa
Ōtautahi Rohe**

UNDER the Resource Management Act 1991

IN THE MATTER of appeals under clause 14(1) of the First
Schedule of the Act in relation to the non-
freshwater planning instrument parts of the
proposed Otago Regional Policy Statement
(PORPS)

BETWEEN **QUEENSTOWN LAKES DISTRICT COUNCIL**
Appellant

AND **OTAGO REGIONAL COUNCIL**
Respondent

**Notice of Oceana Gold (New Zealand) Limited's wish to be a party to
proceedings pursuant to section 274 RMA**

Dated 5 June 2024

Solicitor acting:

Jackie St John
In-house counsel
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Dunedin 9016
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Counsel acting:

Stephen Christensen
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TO: THE REGISTRAR

Environment Court

Christchurch

1. Oceana Gold (New Zealand) Limited (**OceanaGold**) wishes to be a party to the following proceedings:
Queenstown Lakes District Council v Otago Regional Council (ENV-2024-CHC-37).
2. OceanaGold made a submission on the subject matter of the proceedings.
3. OceanaGold is not a trade competitor for the purposes of section 308C or 308CA of the Act.
4. OceanaGold is interested in the parts of the proceeding which relate to the following particular issues:
 - a. HAZ-NH-P1 – Identifying areas subject to natural hazards;
 - b. HAZ-NH-P2 - Risk Assessments;
 - c. HAZ-NH-P3 - New Activities;
 - d. APP6 Methodology for natural hazard risk assessment;
 - e. Definition of highly valued natural features and landscapes;
 - f. NFL-O1 – Outstanding natural features and landscapes;
 - g. UFD – P7 - Rural areas; and
 - h. SRMR – I10 – Economic and domestic activities in Otago use natural resources but do not always properly account for the environmental stresses for the future impacts they cause.

5. OceanaGold supports the relief sought to HAZ-NH-P1 – P3 and APP6 because the hazard provisions need to acknowledge that risks, including significant risks, can be managed or mitigated. As identified in OceanaGold’s own appeal (ENV-2024-CHC-29), there are some uncertainties in these provisions, including references to “resilience”, which need to be resolved so that the provisions can be applied effectively and promote sustainable management.
6. OceanaGold does not support the relief sought for NFL-O1 as there is no directive in the Act to identify and manage highly valued natural features and landscapes (HVNFL). Allowing for management of HVNFL if they are identified will create confusion and ambiguity.
7. OceanaGold does not object to the relief sought for UFD-P7 provided that any amendment does not affect the amendments sought in OceanaGold’s own appeal (ENV-2024-CHC-29), to recognise the social and economic benefits of mining.
8. OceanaGold agrees to participate in mediation or other alternative dispute resolution of the proceedings.

Dated this 5th day of June 2024

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SW Christensen/JE St John
Counsel for Oceana Gold (New Zealand) Limited

The address for service of the appellant is 22 Maclaggan Street, Dunedin.

Documents for service on the filing party may be left at that address for service or may be—

(a) posted to the party at 22 Maclaggan Street, Dunedin or

(b) emailed to the party at Jackie.stjohn@oceanagold.com