

BEFORE THE INDEPENDENT COMMISSIONER HEARINGS PANEL

IN THE MATTER of the Resource Management Act 1991 (RMA)

AND

IN THE MATTER of the MP4 resource consent applications
(RM24.184, WDC 201.2024.2373 and DCC LUC-
2024-126)

MEMORANDUM ON BEHALF OF OCEANA GOLD NEW ZEALAND LIMITED

Dated 11 September 2025

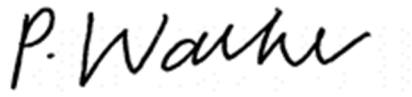
Counsel acting:

Pip Walker
Pip Walker Environment Law
271 Hillhead Road, Dunedin
P 022 044 2631
pip.walker@environmentlaw.nz

MAY IT PLEASE THE COMMISSIONERS:

1. This Memorandum is filed on behalf of the applicant, Oceana Gold (New Zealand) Limited (**OGNZL**).
2. In its Memorandum of 23 June 2025, OGNZL sought directions that the July hearing be adjourned, requested further time to consider the recommendations in the section 42A reports and agreed to doubling the time period by which the hearing must be completed. OGNZL said it would provide a reporting memorandum by 11 September 2025. The Commissioners granted these directions in its third Minute of 23 June.
3. Since this date OGNZL has been considering how best to address the recommendations in the section 42A reports and OGNZL has been assessing a variety of options for moving forward. As part of this process OGNZL has been engaging with Runāka about the issues they have raised, however OGNZL needs further time to work through some of the matters identified by Runāka. These include potential responses to interconnected matters that range outside of the ambit of mitigatory options arising under the Resource Management Act 1991, and raise complicated issues that will take some time to resolve.
4. Accordingly OGNZL requests further time, until 13 October at which point it will provide a further reporting memorandum. OGNZL appreciates that the hearing must be completed by 2 December or else a further extension of the hearing completion date will be required.

Dated this 11th day of September 2025

A handwritten signature in black ink, appearing to read "P. Walker". The signature is written in a cursive, flowing style with a large initial "P" and a long, sweeping underline.

P Walker

Counsel for Oceana Gold (New Zealand) Limited