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TO: oio@linz.govt.nz

CC: My local MP Grant Robertson, the Minister for Land information Eugenie Sage and the Associate Minister of Finance David Clark asking for them to take action to stop this purchase from happening.

Dear Sir/Madam

Re: Plaman Resources Ltd application to purchase 432 hectares of land near Middlemarch, Otago.

I understand the company Plaman Resources Ltd has made an application to the Overseas Investment Office (OIO) to purchase 432 hectares of land near Middlemarch for an open-pit mining project. I also understand that this purchase will facilitate the mining of the scientifically important Foulden Maar site. Unfortunately, I was unable to find this application for purchase on the New Zealand Land Information site www.linz.govt.nz. I understand that despite New Zealand Land Information encouraging public submissions on these applications they are not publicly notified. I am therefore forced to make a submission on this application based only on the news reports of the same. I will also send this email to my local MP, the Hon. Grant Robertson, the Minister for Land information, the Hon. Eugenie Sage and the Associate Minister of Finance, the Hon. David Clark, to ensure they are also aware of my objection to this application and my concerns regarding it.

I wish to express my opposition to Plaman Resources Ltd being given permission to make this purchase. My submission will give my objections to this application based on those factors outlined in the LINZ website that are said to be taken into account by the OIO when assessing such applications. [https://www.lnz.govt.nz/overseas-investment/applying-for-consent-purchase-new-zealand-assets/how-oio-assesses-your-application](https://www.linz.govt.nz/overseas-investment/applying-for-consent-purchase-new-zealand-assets/how-oio-assesses-your-application)

The following are my reasons for my objection to this application.

Investor Test

Firstly I would argue that Plaman Resources Ltd fails the “Investor test”.

Business experience and acumen

I believe that some of the individuals who control of Plaman Resources Ltd do not have the business experience and acumen relevant to this investment. It has been reported by Farah Hancock on the news website Newsroom in an article dated the 14th of May 2019 and <https://www.newsroom.co.nz/2019/05/14/583737/who-is-the-fossil-mining-company-1> that Plaman Resources Ltd is owned by Iris Corporation Berhad and Burleigh Nominees Ltd. This article goes on to report that Burleigh Nominees Limited is owned by the family trusts of Australian investment bankers Peter Plakidis and Geordie Manolas. I understand Mr Plakidis and Mr Manolas are listed as directors of Plaman Resources. The above mentioned news report outlines that neither of these directors appear to have experience in mining operations despite Plaman Global's website stating otherwise. Although the men are experienced in banking and property they both appear to lack of experience in the mining industry, the business that is relevant to this investment.

Good character

I would also argue that Plaman Resources Ltd is unable show that it has met the good character criteria to satisfy the investor test. This is because individuals who have current or recent control over this company have been reported as having issues that bring their good character as defined in the Investor test into doubt.

I again refer you to the news article dated 14th May 2019 by Farah Hancock and published on the website Newsroom. As explained in that article Plaman Resources Ltd is partly owned by the Iris Corporation Berhad. The article goes on to report that in 2017 a deputy managing director of Iris Corporation, Hamdan Mohd Hassan, was arrested by the Malaysian Anti-Corruption Commission for alleged abuse of power and corruption practices. Although the case against him was closed and he was cleared of charges the fact the arrest took place raises concerns about whether the good character criteria of the Investor test has been met.

These concerns are enhanced as the above mentioned news report explains that Rozabil Abdul Rahman, who up until last week was listed as a director of Plaman Resources Ltd, appears to have had issues with repayment of debts. As reported in the Newsroom article in 2018 Mr Rozabil Abdul Rahman faced court action for failing to pay for goods. Although this case was settled out of court and Mr Rozabil Abdul Rahman has been removed as a director of Plaman Resources this again raises concern about whether the persons in charge of Plaman Resources Ltd meet the good character test.

Finally a current director of Plaman Resources Ltd, Paul Poh Yang Hong, is reported, again in the 14th of May article outlined above, to have lost a lawsuit against a casino over a large debt in January of this year.

“Benefit to New Zealand” test

I regard this application as not being of benefit to New Zealand. I believe this application to purchase land fails the “Benefit to New Zealand” test.

It has been reported that this purchase of land will facilitate a mining operation being undertaken by Plaman Resources Ltd. I understand Plaman Resources Ltd aims to turn the fossil-containing diatomite on the Foulden Maar site into food additives for pigs, chickens and turkeys. This mine is reported as possibly generating up to 100 jobs over its projected 27-year lifespan. Unfortunately, as I have been unable to find a copy of the application on the LINZ site, I have been unable to find any evidence supporting this assertion.

Even if this assertion proves to be correct, I would argue that the number of jobs being promised is not substantial enough to justify granting permission for Plaman Resources Ltd to purchase the land. I would also argue that any potential increase in jobs is outweighed by the damage the open pit mining operation would do to the local area and to New Zealand as a whole.

If the OIO gives permission for the purchase of this land, the resulting mining operation will obliterate an extremely valuable and scientifically significant site. The proposed mine is reported as being an open-pit mine intent on mining all the fossil-rich diatomite contained on that site. I would argue that it would therefore be impossible for Plaman Resources Ltd to provide adequate mechanisms to protect or enhance the historic heritage of the site. The mining of the fossil rich diatomite would permanently destroy a historic heritage area of New Zealand and in doing so would obliterate a valuable resource for New Zealand.

This area provided habitat for New Zealand fauna and flora 23 million years ago and is one of the few sites in New Zealand where the fossil record of these extinct indigenous fauna and flora are preserved. The Foulden Maar site is well documented in scientific literature as being of significant importance. See for example this scientific paper

<https://www.tandfonline.com/doi/full/10.1080/03115518.2016.1206321> The fossils this area contains have generated numerous scientific discoveries, research and papers on the indigenous extinct fauna and flora. The fossils sources from the Foulden Maar site have already helped solve a climate change mystery see

<https://www.radionz.co.nz/national/programmes/ninetonoon/audio/201820694/otago-leaf-fossils-help-solve-major-climate-mystery>.

The Foulden Maar site has also been compared to the Messel Pit in Germany see
<https://www.newsroom.co.nz/2019/05/13/581997/growing-opposition-to-fossil-mining> In 1995 the Messel Pit was designated a UNESCO World Natural Heritage site. It is now a tourist destination with a visitor and information centre near the edge of the pit. See

<https://www.germany.travel/en/towns-cities-culture/unesco-world-heritage/messel-pit-fossil-site.html> If permission for Plaman Resources Ltd to purchase the adjoining land to this site is given, the potential for Foulden Maar to become a tourist attraction would be also be eliminated.

Rural Land Directive criteria

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Thirdly I don't believe this application meets the Rural Land Directive criteria as any benefits it might bring about will not be sustainable. It has been reported that production from this open pit mine will only last up to 27 years at the most. The jobs that may be created are unlikely to be longer lasting than the mine itself. I would also argue that no new technology or business skills would be introduced to New Zealand should this application be approved. Although the export of the diatomite may lead to increased exports in the New Zealand mining sector again I would argue that the diatomite a limited resource and that any potential increase in exports will therefore not sustainable.

In light of all of the above I ask the OIO to reject the application made by Plaman Resources Ltd to purchase 432 hectares of land near Middlemarch, Otago.

Yours sincerely

Siobhan Leachman
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