

Appendix KK Wildlife Approval Application Bundle

- **Wildlife Approval application/checklist**
- **Lizard Management Plan**
- **Proof of consultation**

Wildlife Application and Checklist

Wildlife Approval Application

Taharoa Ironsands Limited (**TIL**) seeks a Wildlife Approval for the temporary capture and relocation of lizards on the Central and Southern Blocks of Taharoa C Block, in the Waikato.

This application confirms that TIL has met the requirements for obtaining a Wildlife Approval, as set out in Clause 2, Schedule 7 of the Fast Track Approvals Act 2024.

From Checklist E – Wildlife Approval of the Fast-Track Approvals Substantive Application Form:

Clause, Schedule 7	Information required for an approval described in section 42(4)(h) (Wildlife Act approval), clause 2 of Schedule 7	Response and reference to relevant section of	EPA office use only
2(1)(a)	Specify the purpose of the proposed activity	<p>The purpose of the proposed activity is to:</p> <ul style="list-style-type: none">capture, temporarily hold and relocate lizards prior to site clearance works for the purpose of protecting animals within the works footprint; andincidentally kill lizards, recognising that trapping / handling activities carry some risk of injury or mortality, and that any remaining undetected lizards may also incidentally be killed during site works. <p>(see section 2 of the Lizard Management Plan (LMP) for the Taharoa Central and Southern Blocks Mining Project, Boffa Miskell, page 1)</p>	
2(1)(b)	<p>Identify the actions the applicant wishes to carry out involving protected wildlife and where they will be carried out (whether on or off public conservation land)</p> <p><i>Guidance note: Under clause 2(2) if the substantive application is to be lodged by more than 1 authorised person, the reference to the applicant in subclause (1)(b) is to the authorised person who is identified in the application as the proposed holder of the wildlife approval.</i></p>	<p>The specific actions proposed involving protected wildlife are:</p> <ul style="list-style-type: none">capturing lizards using pitfall / funnel traps and by hand;handling lizards to identify species, measure and photograph them;releasing lizards into a prepared release site; andincidental killing of lizards that could not be captured.	

Clause, Schedule 7	Information required for an approval described in section 42(4)(h) (Wildlife Act approval), clause 2 of Schedule 7	Response and reference to relevant section of	EPA office use only
		<ul style="list-style-type: none"> Catching and handing actions are to occur within the Project Site. <p>(see section 3 of the LMP page 2)</p>	
2(1)(c)	An assessment of the activity and its impacts against the purpose of the Wildlife Act	<p>The primary purpose of the Wildlife Act 1953 ("Wildlife Act") is the protection of wild animals. The activities subject to wildlife approval are consistent with the protective purpose of the Wildlife Act, as protection of lizards is achieved through:</p> <ul style="list-style-type: none"> capturing and relocating lizards in habitat clearance areas prior to vegetation removal activities and earth working; and creation of a lizard release site with habitats designed to support lizards, and pest control to suppress predators. <p>(see section 4 of the LMP, page 4)</p>	
2(1)(d)	List protected wildlife species known or predicted to be in the area and, where possible, the numbers of wildlife present and numbers likely to be impacted	Lizard species <i>may</i> be present on the site. A full description of the species and numbers is set out at sections 5.1 - 5.4 of the LMP, pages 5-11.	
2(1)(e)	An outline of impacts on threatened, data deficient, and at-risk wildlife species (as defined in the New Zealand Threat Classification System)	Potential impacts of the proposed activity, if lizards are present, are addressed at section 5.4.3 of the LMP, page 13.	
2(1)(f)	A statement of how the methods proposed to be used to conduct the actions involving protected wildlife will ensure that best practice standards are met	The methods proposed to be used and how they will meet best practice standards are addressed at section 6 of the LMP, page 18.	
2(1)(g)	A description of the methods to be used to safely, efficiently, and humanely catch, hold, or kill the animals and identify relevant animal ethics processes:	The methods to be used to catch, hold or kill lizards are addressed at section 6.4.3-6.4.5 of the LMP, pages 22-27.	

Clause, Schedule 7	Information required for an approval described in section 42(4)(h) (Wildlife Act approval), clause 2 of Schedule 7	Response and reference to relevant section of	EPA office use only
2(1)(h)	A statement of the location or locations in which the activity will be carried out, including a map (and GPS co-ordinates if available)	The activity will be carried out in the Central and Southern Blocks of the Taharoa Mine, south of Mitiwai Stream. A map and coordinates are set out at section 3.2 of the LMP pages 2-3.	
2(1)(i)	A statement of whether authorisation is sought to temporarily hold or relocate wildlife	Authorisation is sought to temporarily hold and relocate wildlife. See Section 2 of the LMP, page 1.	
2(1)(j)	A list of all actual and potential wildlife effects (adverse or positive) of the proposed activity, including effects on the target species, other indigenous species, and the ecosystems at the site	Details of all actual and potential effects is set out at sections 5.4.3 and 5.4.4 of the LMP, pages 13-15.	
2(1)(k)	Where adverse effects are identified, state what methods will be used to avoid and minimise those effects, and any offsetting or compensation proposed to address unmitigated adverse effects (including steps taken before the project begins, such as surveying, salvaging, and relocating protected wildlife)	Details of methods proposed to avoid and minimise effects are addressed at sections 6.3-6.4 of the LMP. Proposed compensation for residual adverse effects is identified at section 6.5 pf the LMP (pages 28).	
2(1)(l)	A statement of whether the applicant or any company director, trustee, partner, or anyone else involved with the application has been convicted of any offence under the Wildlife Act	Neither TIL nor any company director, trustee, partner or other person involved with the application has any relevant convictions under the Wildlife Act.	
2(1)(m)	A statement of whether the applicant or any company director, trustee, partner, or anyone else involved with the application has any current criminal charges under the Wildlife Act pending before a court	Neither TIL nor any company director, trustee, partner or other person involved with the application has any current charges under the Wildlife Act pending before a Court.	
2(1)(n)	Provision of proof and details of all consultation, including with	TIL has undertaken consultation on the application, including with the Department of	

Clause, Schedule 7	Information required for an approval described in section 42(4)(h) (Wildlife Act approval), clause 2 of Schedule 7	Response and reference to relevant section of	EPA office use only
	hapū or iwi, on the application specific to wildlife impacts	<p>Conservation and relevant hapū or iwi.</p> <p>Details of consultation undertaken is set out at Appendix Y and Z of the substantive application.</p>	
2(1)(o)	Provision of any additional written expert views, advice, or opinions the applicant has obtained concerning their proposal	<p>This application is supported by the LMP prepared by independent technical expert, Boffa Miskell.</p> <p>The substantive application includes an Ecological Assessment – Fauna prepared by an independent technical expert (SLR Consulting) (Appendix M) which addresses the potential effects of the project on herpetofauna.</p>	

Lizard Management Plan

Boffa Miskell



Taharoa Ironsands - Central and Southern Blocks

Lizard Management Plan for Wildlife Approval Application

Prepared for Taharoa Ironsands Limited

16 October 2025





Boffa Miskell is proudly a
Toitū net carbonzero certified consultancy

Document Quality Assurance

This document may be cited as:

Boffa Miskell Limited 2025. *Taharoa Ironsands - Central and Southern Blocks: Lizard Management Plan for Wildlife Approval Application*. Report prepared by Boffa Miskell Limited for Taharoa Ironsands Limited.

For any information regarding this report please contact:

Katherine Muchna | Ecologist | Senior Principal | katherine.muchna@boffamiskell.co.nz

Revision /version:	Issue date:	Prepared by:	Description:	Reviewed by:
Draft V1	20/08/2025	Katherine Muchna Ecologist / Senior Principal	Preliminary draft report for client comment	Andrew Blayney Ecologist / Senior Principal
Final Draft V2	19/09/25	Katherine Muchna Ecologist / Senior Principal	Updated with review comments	
Final V3	16/10/25	Katherine Muchna Ecologist / Senior Principal	Updated with review comments	Scott Hooson Ecologist / Associate Partner

Approved for issue:

Scott Hooson | Ecologist | Associate Partner | 16/10/2025

Release and Reliance

This report has been prepared by Boffa Miskell Limited on the instructions of our Client, in accordance with the agreed scope of work. It is intended to support the Client's application under the Fast-track Approvals Act 2024 and may be relied upon by the Expert Panel and relevant administering agencies for the purposes of assessing the application. While Boffa Miskell Limited has exercised due care in preparing this report, it does not accept liability for any use of the report beyond its intended purpose. Where information has been supplied by the Client or obtained from external sources, it has been assumed to be accurate unless otherwise stated.

File name & Project number: BM240655.03_Final_Taharoa_LMP_V3.docx, BM240655.03

Template revision: 20250522 0000

Cover photo: Taharoa Northern Block with similar habitats © Boffa Miskell 2024

Executive Summary

Taharoa Ironsands Limited (TIL) are proposing to continue their existing iron sand mining operation, concentration, and processing facilities at the Central and Southern Blocks of the Taharoa Mine (Project Site) to enable the export of titanomagnetite from the Port of Taharoa through the Fast-track Approvals Act 2024 (“FTAA”).

This Lizard Management Plan describes the management of native lizards within the Project Site, an area of approximately 911 ha south of Kawhia Harbour. This plan is informed by ecological assessments and surveys carried out by SLR Consulting New Zealand (SLR). This report provides the information required for a Wildlife Approval application under the FTAA.

A Wildlife Approval is required for the capture and relocation of native lizards for the purpose of protecting lizards within the mine area. This report describes:

- The native lizard species potentially present in the Project Site
- An assessment of potential effects on native lizards
- Measures to avoid and minimise / mitigate these impacts (including through capture and relocation) in areas of potential lizard habitat
- Methods to prepare the release site and capture, temporarily hold and relocate lizards.
- Compensation to address incidental killing of lizards / inability to salvage all lizards (monetary compensation).

The Wildlife Approval checklist (Checklist E) is provided in Appendix 1 to guide the reader to relevant sections of this Management Plan.

The Project Site has a history of disturbance, dating from the early 1970's when iron sand mining began. Mining has continued across the site over the last 50 years. Plantation pine forestry has occurred on parts of the site as mining operations moved and the remaining sand was stabilised. With this site history, the potential for lizards to persist across the majority of the Project Site is low, even where habitat is present.

The proposed lizard management to capture and salvage lizards is focused on the northern and southern margins that are connected to habitats outside the Project Site where there is, therefore, a source of lizards that could disperse into the site.

The level of effect of removing potential habitat features within the Project Site on the size or viability of local lizard populations is assessed as low, as these are marginal habitats on the periphery of an active mine.

Potential effects on non-threatened lizard fauna can be mitigated and minimised through salvage of individuals within the identified potential habitats and replacing the extent of habitat removed within the wider Project Site at the completion of mining. Compensation is proposed to address the potential for incidental lizard mortality.

CONTENTS

Executive Summary	i
1.0 Introduction	1
2.0 Purpose of the proposed activity (s7, cl 2(1)(i) of the FTA) 3.0 Actions to be carried out and locations in which the activity will be carried out	1 2
3.1 Actions to be carried out	2
3.2 Site Location, History and Context	2
4.0 Assessment of the activity against the purpose (s7, cl 2(1)(c) of the FTA) 5.0 Wildlife species, impacts and effects	4 5
5.1 Survey records(s7, cl 2(1)(d) of the FTA)	5
5.2 BioWeb records	7
5.3 Lizard habitats within the site	9
5.4 Numbers impacted and effects (s7, cl 2(1)(c) and (e) of the FTA)	11
6.0 Methods (s7, cl 2(1)(g) and (k) of the FTA) 6.1 Overview s7, cl 2(1)(f) of the FTA 6.2 Approach 6.3 Avoid 6.4 Minimise 6.5 Compensation	18 18 19 19 19 28
7.0 Post release monitoring and reporting 7.1 Reporting 7.2 Post-release monitoring	29 29 29
8.0 Wildlife Act offences (s7, cl 2(1)(l) of the FTA)	29
9.0 Consultation (s7, cl 2(1)(n) of the FTA)	30
10.0 Additional supporting documentation (s7, cl 2(1)(o) of the FTA) 11.0 References	30 30

Appendices

Appendix 1: Wildlife Approval checklist

Figures

Figure 1: Identified potential lizard habitats. Vegetation type categories are based on SLR (2025a)	11
Figure 2: Vegetation within the proposed lizard release site located in the background of these images.	24

1.0 Introduction

TIL is seeking approvals through the Fast-track Approvals Act 2024 (“FTAA”) to continue the existing ironsand mining operation on the Central and Southern Blocks at Taharoa C Block (the Project Site), including the concentration and processing of ironsand to continue exporting titanomagnetite from the Port of Taharoa.

This Lizard Management Plan (LMP) is provided to inform the Project substantive application under the Fast Track Approval legislation, and specifically the application for a Wildlife Approval under Schedule 7, clause 2 of the FTAA. This application seeks approval to capture, temporarily hold and relocate, and kill native lizard species. Lizards likely to be present on the site are classified as Not Threatened.

This document follows the format of the Wildlife Approval checklist (Checklist E) to ensure that all required information is provided. The Wildlife Approval Checklist is also provided in Appendix 1 to assist the reader.

This report was prepared based on lizard and vegetation survey data collected by SLR Consulting New Zealand (SLR).

This report should be read in conjunction with:

- Taharoa Ironsands Central and Southern Block Mining Project: Ecological Impact Assessment for wetlands and terrestrial vegetation (EcIA, SLR, 2025a).
- Taharoa Ironsands Central and Southern Block Mining Project: Ecological Assessment - Fauna (EcIA, SLR, 2025b)
- Substantive application report prepared by Tonkin and Taylor Ltd, dated September 2025

2.0 Purpose of the proposed activity (s7, cl 2(1)(i) of the FTAA)

TIL seeks a wildlife approval to:

- **capture, temporarily hold and relocate** lizards prior to site clearance works for the purpose of protecting animals within the works footprint; and
- **incidentally kill** lizards, recognising that trapping / handling activities carry some risk of injury or mortality, and that any remaining undetected lizards may also incidentally be killed during site works.

The approach to the management of native lizards within the Project Site prior to, and during works, is described within this report.

TIL seeks that the duration of the wildlife approval be **10 years** to ensure that that the term of the approval adequately covers the initial stages of the operation. TIL intends to apply for a variation to extend the term of the approval as required beyond the initial 10-year term. The term of the resource consent applied for is 35 years.

The requested term is **1 January 2026 – 1 January 2036**.

3.0 Actions to be carried out and locations in which the activity will be carried out

3.1 Actions to be carried out

The specific actions proposed involving protected wildlife are:

- capturing lizards using pitfall / funnel traps and by hand;
- handling lizards to identify species, measure and photograph them;
- releasing lizards into a prepared release site; and
- incidental killing of lizards that could not be captured.

Catching and handing actions are to occur within the Project Site.

3.2 Site Location, History and Context

3.2.1 Location (s7, cl 2(1)(h) of the FTA)

The Taharoa Ironsands Mine (the Mine) is located on the west coast of the North Island, south of Kawhia Harbour. The mine comprises two areas, the Northern Block and the South / Central Block. The Project Site of this management plan is the Central / Southern Blocks, south of Mitiwai Stream (Map 1). The approximate centre of the Project Site is located at -38.170271 latitude, 174.712854 longitude.

Lizard release is to occur at the proposed release site, in land excluded from mining near Wainui Stream (approximate location 38.168676 latitude, 174.717035 longitude). This site is further discussed in Section 6.4.3 of this report.

3.2.2 Site history

This management plan is informed by the archaeological assessment prepared by Clough and Associates (2025). The Archaeological Assessment describes the long history of sandmining within the Project Site, with evidence (from aerial imagery) of sandmining before 1974. Additional landscape modifications included road construction, stream realignment and creation of dams. In the following decades, sandmining proceeded across the landscape of the Central and Southern Blocks. Plantation forestry was established in the Central Block and was clearly visible in aerial imagery from 1997. The forestry was subsequently harvested, and further mining was carried out in the Southern Block, moving into the southern part of the southern block from 2001. From 2013, the majority of the Project Site was a mix of plantation forestry in formerly mined areas and ongoing mining in the Central Block.



0
440 m
1:17,500 @ A3

Data Sources: SNA sourced from Waitomo DC. Exclusion areas sourced from SLR. Copyright 2016 Crown copyright (c) - Land Information New Zealand, Eagle Technology, LINZ

Projection: NZGD 2000 New Zealand Transverse Mercator

TAHAROA IRONSANDS-SOUTH AND CENTRAL BLOCK ECOLOGY

Site Location (South and Central)

Date: 26 August 2025 | Revision: 0

Plan prepared for Taharoa Ironsands Ltd by Boffa Miskell Limited

Project Manager:

Drawn: BMC | Checked: KMU

Map 1

3.2.3 Vegetation cover and features

Field surveys conducted by SLR in 2021-22 identified 39 vegetation types within the Project Site (SLR 2025a). The Central Block site is predominantly bare or sparsely vegetated sand, comprising sparse patches of sand sedge (*Carex pumila*), marram grass (*Calamagrostis arenaria*) and tree lupin (*Lupinus arboreus*). This covers over 380 ha and includes all the active mine areas and tailings cells.

The Southern Block has more variable vegetation, in part because it has not been mined for a longer period of time and rehabilitation planting has occurred in some areas. As noted above, plantation pine forestry has occurred in parts of the Project Site, this has resulted in areas of wilding radiata pines across the Project Site. A large area of plantation pine forest is located next to Lake Taharoa on the eastern boundary of the Project Site.

The Project Site also contains multiple wetlands, ponds, channels, and depressions. Many of these were formed from the hollows and swales created by mining operations. Grazing by feral cattle and horses is also notable in some areas.

Vegetation cover and the existing environment as it pertains to lizard habitats is described in Section 5.3.

Areas excluded from future mining within the Project Site include:

- TIL Reserved Land (archaeological and culturally significant areas reserved from mining);
- Significant Natural Areas;
- A 30 m buffer around perennial water bodies; and
- A 100 m buffer around the mean high water springs (MHWS) along the coast.

These exclusion areas are shown on Map 1.

4.0 Assessment of the activity against the purpose (s7, cl 2(1)(c) of the FTAA)

The primary purpose of the Wildlife Act 1953 (“Wildlife Act”) is the protection of wild animals.

The activities subject to wildlife approval are consistent with the protective purpose of the Wildlife Act, as protection of lizards is achieved through:

- capturing and relocating lizards in habitat clearance areas prior to vegetation removal activities and earth working; and
- creation of a lizard release site with habitats designed to support lizards, and pest control to suppress predators.

5.0 Wildlife species, impacts and effects

5.1 Survey records¹(s7, cl 2(1)(d) of the FTA)

Lizard surveys using triple-stacked artificial retreats (ARs) and manual search methods were undertaken by SLR (SLR, 2025b). A total of 20 ARs were installed in September 2021, checked in December 2021 and February 2022. AR sites were chosen to cover the comparatively higher-quality potential habitats across the Site, with large areas subject to active mining deemed unsuitable, and areas currently grazed avoided due to the potential for stock impacting ARs.

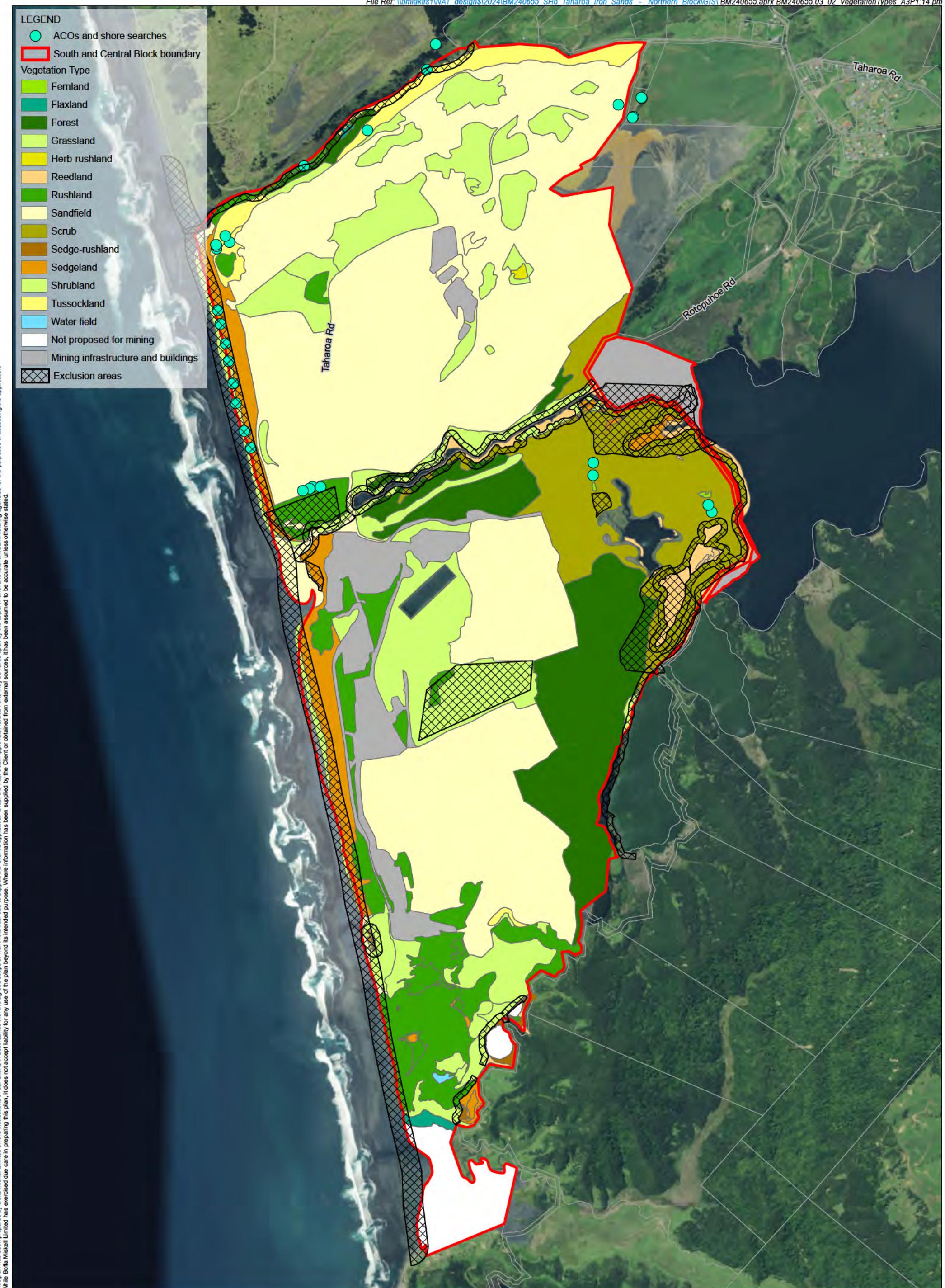
Habitats where ARs were installed included pine slash piles, back dune vegetation and forest edges. The locations of the ARs are shown in Map 2. Manual hand searches of suitable habitat were carried out by four ecologists around the AR deployment sites and along the coastal foredunes.

The habitat types available within the Project Site were assessed as unsuitable by SLR for native arboreal gecko populations and no targeted gecko surveys were undertaken as part of this assessment. Based on the vegetation descriptions and their assessment, the presence of arboreal geckos appears unlikely.

No native or invasive skinks were identified during the surveys. SLR also noted that, anecdotally, TIL staff have not observed lizards on the Project Site during their time there. Surveys using a greater range of methods with a more intensive and wider coverage (particularly in the Southern Block) would better inform this assessment. It is possible that lizards are either absent, or present on the Project Site at low densities based on the habitats available and the history of disturbance at the Site.

Lizard surveys conducted in a neighbouring site, the Northern Block, detected a single copper skink.

¹ Principle 1 of the 9 Principles of Lizard Salvage.



5.2 BioWeb records²

Lizards are cryptic and difficult to detect, particularly at low densities and in the presence of predators. The DOC Herpetofauna (BioWeb) Database provides useful additional information on taxa potentially present within a given search area to supplement survey data, while recognising that Bioweb records reflect observer expertise and the level of search effort in an area.

BioWeb records in the vicinity of the Project Site and surrounding area are very sparse so there is limited contextual information available with respect to the distribution and abundance of lizard populations (Map 2).

The Bioweb Database holds records for four native lizard species within 30 km of the Project Site (Table 1). Of the species recorded, only one species of skink (copper skink) is likely to be present within the Project Site given the existing vegetation cover and disturbance history of the area, as this species is widespread and more typically found in modified habitats. Records of native frog species (Archey's and Hochstetter's frogs) have been excluded from the dataset as the site does not provide suitable habitat for native frogs.

None of the species identified in Table 1 are classified as 'Threatened' in the New Zealand Threat Classification System.

Table 1. Native lizard records within 30 km of the Project Site and species' habitat preferences. Excluding apparently erroneous records (i.e. Raukawa gecko, known from the east coast of the upper North Island, robust skink now restricted to islands on the west coast). Waikato Region does not have a regional threat classification for lizards. Copper skink (pale blue row) is the only native species likely to be present at the Project Site based on the habitats present and the site's disturbance history.

Species	Threat classification (Hitchmough et al., 2021)	Habitat (Van Winkel et al., 2018)	Distance of closest record	Most recent record	Number of records
Copper skink (<i>Oligosoma ornatum</i>)	At Risk - Declining	Occupies a range of coastal and lowland habitats such as coastal vegetation, grassland, scrub and forest. Refuges include leaf litter, rocks, logs, flax and rank grass.	Northern Block of Taharoa Mine	2021	3
Forest gecko (<i>Mokopirirakau granulatus</i>)	At Risk - Declining	Occupies a broad habitat niche, including coastal and lowland habitats as well as montane and alpine habitats if available. Inhabits forests, scrubland and herbfields.	25 km	1986	1
Pacific gecko (<i>Dactylocnemis pacificus</i>)	At Risk – Relict	Occupies coastal and lowland habitats including boulder beaches, scrubland, flaxland and forest.	22 km	1980	3
Elegant gecko (<i>Naultinus elegans</i>)	At Risk - Declining	Gumland, scrubland and forested habitats	17 km	2004	6

² Principle 1 of the 9 Principles of Lizard Salvage: Lizard species' values and site significance must be assessed at both the development and receiving sites.



5.3 Lizard habitats within the site

In the reconsenting context, the existing environment assumes that the environment is as it would be when any existing regional resource consents expire. In this case, this means that the area to be mined would now include open pasture, vegetation and sand dunes, as rehabilitated in accordance with the conditions of the consent (i.e. progressively rehabilitated before final rehabilitation occurs in the lead up to mine closure). It is anticipated that in these conditions, the rehabilitated mine area would provide potential habitat for lizards as determined by the completed ecological surveys.

A total of 39 vegetation types were described by SLR (SLR, 2025a). These are mapped in Map 2 in a simplified form showing vegetation categories. The majority of the Project Site (380 ha) is bare or sparsely vegetated sand with patchy sand sedge, marram grass and tree lupin. In the Southern Block, vegetation cover includes kikuyu-dominated pasture interspersed with knobby clubrush, tree lupin and marram grass. A band of harakeke (flax) is present at the very southern edge of the proposed mining area.

Wetland-associated vegetation types, including rushlands, reedlands and herb-rushlands are present around wetlands in the eastern and south-eastern parts of the Project Site. Plantation pine forest is present in an 80 ha area adjacent to Lake Taharoa and in smaller fragments across the Project Site. Along the coastal fringe, part of the foredune is dominated by spinifex, with a more stable vegetated area behind it dominated by knobby clubrush.

Whilst many of these vegetation types *could* provide habitat for native lizards, the likelihood of lizards being present is low. This assessment takes into consideration the history of the Project Site including continuous activity for more than 50 years that has progressively stripped all the vegetation; and the natural features such as lakes, wetlands and rivers that restrict dispersal into the Project Site on the northern, southern and eastern boundaries. For these reasons, it is unlikely that lizards are present throughout the majority of the site.

However, where suitable vegetation / habitat is present in the northern and southern parts of the Project Site that are connected to adjacent (unmined) areas, lizards are more likely to be present. Management of lizards in this plan focusses on these areas, identified in Table 2 and Maps 4 and 5. Using the vegetation categories described by SLR (2025a), potential habitats in the northern and southern boundary areas are shown in Figure 1. These vegetation types include:

- Vegetation type 2: Knobby club rush - (gorse) - (lupin) - (pampas) / pasture – pōhuehue (Rushland)
- Vegetation type 16: Pampas - [tree lupin] / pasture (Tussockland)
- Vegetation type 20: Radiata pine (Forest), and margins
- Vegetation type 27: Grey willow / (raupō) - (harakeke) (Scrub)
- Vegetation type 35: Inkweed (Shrubland)
- Vegetation type 1: Harakeke (Flaxland)

Northern boundary

Vegetation type 2:

Knobby club rush - (gorse) - (lupin) - (pampas) / pasture – pōhuehue

(Rushland)



Northern boundary

Vegetation type 16:

Pampas - [tree lupin] / pasture

(Tussockland)



Northern boundary

Vegetation type 20:

Radiata pine

(Forest)



Northern boundary	
Vegetation type 27:	
Grey willow / (raupō) - (harakeke)	
(Scrub)	
Southern boundary	
Vegetation type 1:	
Harakeke	
(Flaxland)	

Figure 1: Identified potential lizard habitats. Vegetation type categories are based on SLR (2025a).

5.4 Numbers impacted and effects³ (s7, cl 2(1)(c) and (e) of the FTA)

5.4.1 Description of proposed works

The activities within the Project Site that may impact lizards, if present, are described in the substantive application report (Tonkin and Taylor Ltd, 2025), and include:

Vegetation and topsoil removal

Vegetation and topsoil are removed separately from any underlying material to allow appropriate reuse in rehabilitation phases. This typically involves:

- Harvesting of any large trees with commercial value (i.e. pine plantations).
- Removing other vegetation (i.e. scrub and smaller trees) with earthmoving machinery (i.e., bulldozers and excavators). The vegetation is stockpiled to naturally compost for later use around the site. In addition, useful native species are removed prior to stripping of topsoil for use in the eco-sourced nursery on site.

³ Principle 2 of the 9 Principles of Lizard Salvage: Actual and potential development-related effects and their significance must be assessed.

- Stripping of topsoil and stockpiling for use in future rehabilitation activities.

Overburden removal and ironsand extraction

- Heavy earthmoving machinery (excavators, trucks, bulldozers etc.) is used to remove and stockpile the overburden. This stockpiled material is reused for landform recontouring during rehabilitation.
- Ironsand is extracted using various methods and equipment depending on ground conditions and mining methodology. In upper layers, standard earthmoving machinery such as excavators, bulldozers, and trucks are used to collect the ironsand.

Earthworks required for these steps have the potential to create dust which may deposit on habitats adjacent to the active mining areas.

Stabilisation and Rehabilitation

Once the tailings have dewatered, mechanical plant (excavators and bulldozers) redistribute the material to form the grade and levels required by the rehabilitation plan for that area. Following this the land may be stabilised, top-soiled and replanted.

An eco-sourcing nursery has been set up on site to provide some plants for use in the rehabilitation of previously mined areas. Where vegetation removal is required as part of preparatory work for mining activity, native species will be transplanted and used in the ongoing development of native stock at the nursery.

In the future, these areas where tailings have been disposed may be re-mined if it becomes economically viable to do so (i.e. if extraction processes become more efficient).

5.4.2 Numbers impacted

The historic land use at the Project Site as well as current mining activity and pine harvesting (see Section 3.2.2) makes it very unlikely that lizards would persist within interior parts of the Project Site. For this reason, these areas are excluded from further consideration as potential habitat, regardless of vegetation cover. Potential habitats that may be occupied by lizards include boundary areas in the northern part of the Central Block and the southern part of the Southern Block that are connected to surrounding habitat outside of the previous or existing mine areas (Figure 4, Table 2). The effects on lizards in the identified potential habitats are described in Section 5.4.3. The areas of potential lizard habitat within the Project Site comprise 14.77 ha, not including mining exclusion areas.

This assessment presumes current land management and vegetation cover remains much the same until vegetation is cleared. If lizard habitats develop in areas adjacent to the potential habitat areas shown in Figures 4 and 5, prior to activities commencing, the extent of lizard habitat may need to be reassessed. A site inspection will be carried out prior to clearance in areas adjacent to the potential habitat areas shown in Figures 4 and 5, and the findings will be documented and provided as described in Section 7.1

5.4.3 Potential effects of the proposed activity if lizards are present (sch 7, clause 2(1) (e) and (j) of the FTA)

Habitat loss and fragmentation

There will be complete loss of habitat in all mined areas, as the mining process involves removing all vegetation and topsoil from the area, and then excavation of the iron sand beneath. Mined areas will be rehabilitated once mining is complete, although this does not preclude future use (see Section 5.4.1).

The magnitude of the effect of removal of identified potential lizard habitats in the northern and southern margins of the Project Site is assessed as Low⁴. Despite being the most connected and intact habitats, any lizards present are subject to intermittent habitat disturbance from grazing, mining activities (e.g. vibrations, dust) and uncontrolled predators. If present, lizards are likely at low density. Copper skinks are classified as 'At Risk – Declining' and have High ecological value if present. The level of effect of habitat removal on copper skinks is **Low**⁵.

The potential magnitude of effect of habitat fragmentation is assessed as Negligible⁶, based on the lizard habits within the mining area and the mining methodology whereby large areas are earthworked in stages, moving across the site, rather than isolating pockets of habitat. The level of effect of habitat fragmentation on copper skinks is **Very Low**.

Injury, death or disturbance during vegetation clearance

In the absence of management, habitat clearance may result in death of, or displacement of, lizards into the surrounding sparse vegetation, which affords limited habitat for lizards, being predominantly patchy sand sedge, marram grass, tree lupin, and bare sand with a presumed low carrying capacity for lizards.

Lizards are particularly vulnerable to injury and mortality during vegetation clearance because they are visually and behaviourally cryptic (hiding under cover when disturbed), have low mobility (especially in cooler temperatures), and are inactive for parts of the year.

If lizards are present, injury and death of any resident lizards in habitat patches during vegetation removal and mining is likely in the absence of management, though the magnitude of effect on the overall abundance or viability of remaining meta-populations is Low, given the low likelihood of lizard presence and likely low abundance of lizards. The level of effect of injury or death during vegetation clearance at a meta-population scale is **Low**.

Noise, dust and vibrations

Disturbance and sub-lethal stress to lizards during mining operations, such as noise, dust and vibrations, may impact lizards that are predominantly ground-dwelling (i.e. copper skink). However, various extents of the Project Site have been operated as a mine for over 50 years and have been subject to a level of disturbance which will continue to at least the same level in future operations. The magnitude of effect on lizards from increased dust and vibrations is

⁴ Based on the EIANZ criteria for describing magnitude of effect (Table 8) (Roper-Lindsay et al. 2018). A low magnitude of effect corresponds to "Minor shift away from existing baseline conditions. Change arising from the loss/alteration will be discernible, but underlying character, composition and/or attributes of the existing baseline condition will be similar to pre-development circumstances or patterns; AND/OR Having a minor effect on the known population or range of the element/feature" within the context of the local environment.

⁵ Based on the EIANZ criteria for describing level of the effect (Table 10) (Roper-Lindsay et al. 2018).

⁶ Based on the EIANZ criteria for describing magnitude of effect (Table 8) (Roper-Lindsay et al. 2018). A negligible magnitude of effect corresponds to "Very slight change from the existing baseline condition. Change barely distinguishable, approximating to the 'no change' situation; AND/OR Having negligible effect on the known population or range of the element/feature".

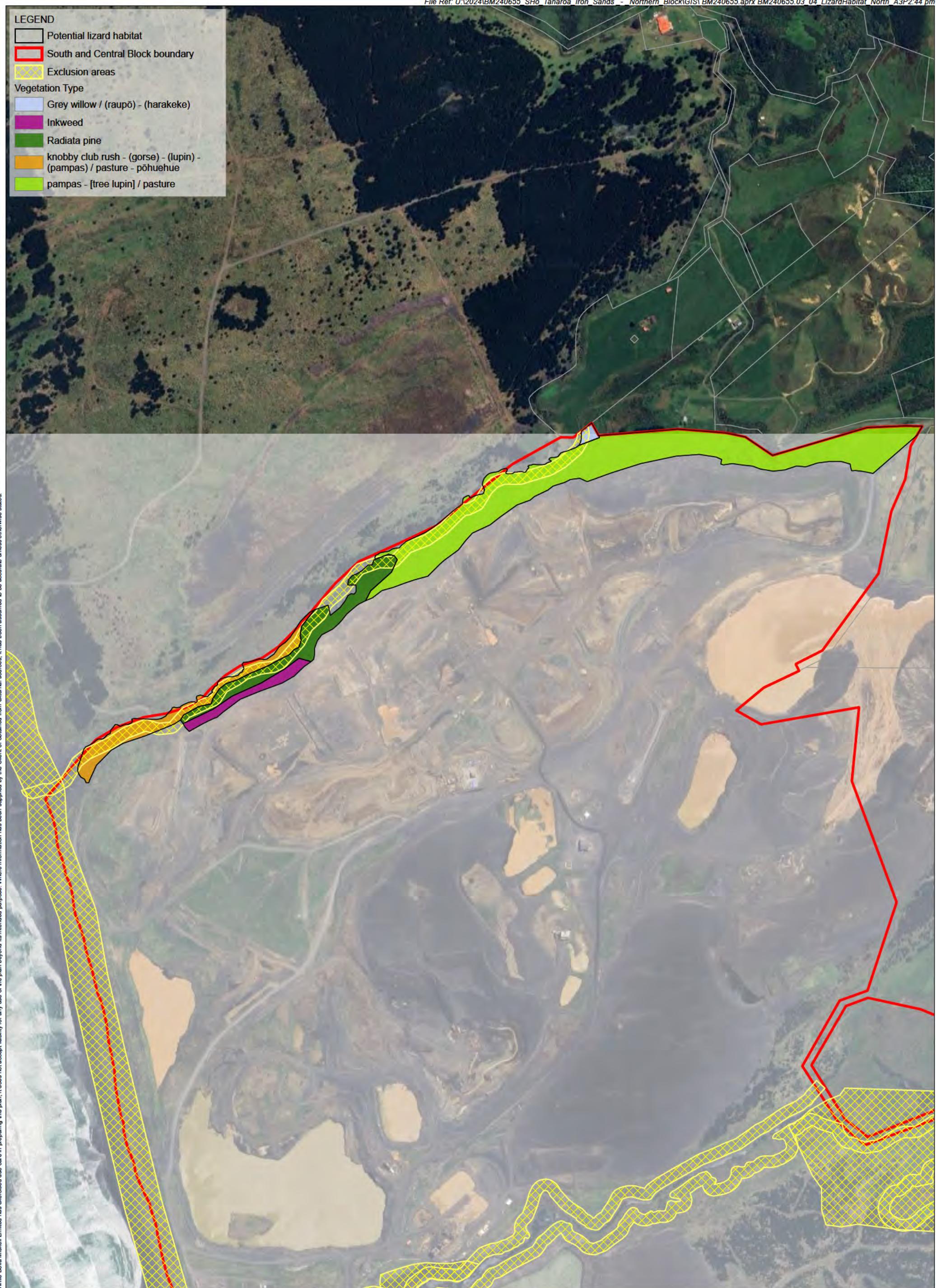
assessed as Negligible given that the mining operation has been active across the Project Site for a long time. The level of effect of noise, dust and vibrations on copper skinks is **Very Low**.

This assessment of the level of effects on copper skinks within the Project Site is consistent with SLR 2025b.

The extent of identified potential lizard habitat and anticipated number of lizards that may be impacted within the Project Site is provided in Table 2.

Table 2: Lizard habitat suitability of vegetation communities within the Project Site. Estimates of the number of lizards potentially impacted assumes all the habitat of this type identified in Figures 4 and 5 is removed (not including the exclusion areas that will not be mined). Description of lizard habitat value is based on Table 10 of SLR 2025a and review of aerial photography.

Plant Community		Lizard habitat value	Project Site area
Vegetation categories (SLR, 2025a)		Terrestrial habitats	(ha)
1	Harakeke (Flaxland)	<p>Harakeke dominated vegetation is present in a small patch near the northern boundary of the Project Site and a larger area in the southern margin of the site where it connects to an SNA. In the south, this vegetation may provide some connectivity between the inland hills and coastal fringe populations. Being predominantly located in the southern part of the site that has had minimal mining activity this area has the highest likelihood of lizard occupancy.</p> <p>A small number of lizards may be impacted (<100.)</p>	1.30
2	Knobby club rush - (gorse) - (lupin) - (pampas) / pasture - pōhuehue (Rushland)	<p>This vegetation type is on the northern boundary of the site <u>only</u> and may provide habitat for lizards with pampas and pōhuehue providing cover and food resources.</p> <p>A small number of lizards may be present (<100).</p>	0.94
16	Pampas - [tree lupin] / pasture (Tussockland)	<p>This vegetation type is on the northern boundary of the site <u>only</u>, may provide complex habitats for lizards, and is connected to neighbouring pasture and Mitiwai Stream.</p> <p>A small number of lizards may be impacted (<100.)</p>	10.09
20	Radiata pine (Forest)	<p>This vegetation type is on the northern boundary of the site <u>only</u>, comprises a narrow windbreak / slash, and woody material may provide low quality habitats for lizards</p> <p>A minimal number of lizards may be present (<20).</p>	1.52
27	Grey willow / (raupō) - (harakeke) (Scrub)	<p>This vegetation type is on the northern boundary of the site <u>only</u> and may provide sufficient cover for lizards in harakeke. Some areas may be too wet for permanent lizard occupation.</p> <p>A minimal number of lizards may be present (<20).</p>	0.09
35	Inkweed (Shrubland)	<p>Dense inkweed would likely create too much shade for native lizards, but patchy cover may provide low quality habitat for native lizards.</p> <p>A minimal number of lizards may be present (<20).</p>	0.83
TOTAL			14.77 ha





This plan has been prepared by Boffa Miskell Limited on the instructions of our Client, in accordance with the agreed scope of work. It is intended to support the Client's application under the Fast-track Approvals Act 2024 and may be relied upon by the Expert Panel and relevant administering agencies for the purposes of assessing the application. While Boffa Miskell Limited has exercised due care in preparing this plan, it does not accept liability for any use of the plan beyond its intended purpose. Where information has been supplied by the Client or obtained from external sources, it has been assumed to be accurate unless otherwise stated.

5.4.4 Summary of potential effects if lizards are present

The proposed management methods to address these impacts are summarised in Table 3 and described in detail in Section 6.0.

Table 3: Summary of effects management for lizards.

Effect	Management method
Habitat loss and fragmentation	Habitat loss is a certainty if lizards are present. Vegetation remediation at the completion of mining is proposed as described in the Site Rehabilitation and Closure Plan. We note that there is likely to be a time lag between mining and remediation, so any benefit is far in the future.
Injury, death and disturbance during construction	<p>Lizard surveys and salvage will be undertaken in areas identified in Figures 4 and 5 prior to clearance. These surveys will be extended beyond these areas if suitable habitat has expanded and lizards may have dispersed into those areas (as explained in s 5.4.2 above).</p> <p>Where lizards are detected, they will be captured and relocated to a prepared release site using standard salvage and relocation methods by a suitably qualified and experienced ecologist(s).</p> <p>To reduce the likelihood of skinks from adjacent lizard habitats moving into habitats inside the Project Site during and following the salvage, any connected areas of lizard habitat where lizards are detected are to be temporarily fenced off with a lizard-proof silt fence until the adjacent habitat is removed. If the fence is in place for more than 3 months following salvage, clearance areas will be resurveyed.</p>
Stress and disease transmission	<p>Lizards will be placed in individual containers and kept in a cool place until released. Handling will be minimised to ensure they do not become stressed. All traps will be checked daily in the morning.</p> <p>Lizard handling will follow best practice and hygiene protocols to minimise the risk of disease transmission. Details on storing and handling procedures are provided in the Section 6.4.2.4 of this report.</p>
Lizard release site and pest control (positive)	Pest control is proposed at the release site, as described in Section 6.4.5 of this report and in SLR 2025c. Pest control is also proposed for the offset site and all buffer zones (SLR 2025c).

6.0 Methods (s7, cl 2(1)(g) and (k) of the FTA)

6.1 Overview s7, cl 2(1)(f) of the FTA)

As described below, lizard management will follow best practise standards provided in Department of Conservation guidance documents. These include methods to survey and capture lizards (DOC 2012) and follow the 'Principles for Lizard Salvage Translocations' (DOC 2019) and 'Guidance for lizard habitat clearance' (DOC 2023).

It is not possible for mining operations to avoid all potential lizard habitat. The rationale for lizard salvage as a management tool is provided in Section 6.3.1. This addresses Principle 3 of the 9 Principles of Lizard Salvage, “alternatives to moving lizards must be considered”.

6.2 Approach

Based on the lizard habitat assessment described in Section 5.3, which determined the majority of the Project Site area is unsuitable for lizards, the lizard management approach is to target any lizard survey and salvage activities in high quality, connected habitat areas. If any lizards are detected, salvage effort will be increased, and compensation will be provided.

6.3 Avoid

If native lizards are present within the Project Site, it is not possible to avoid impacts on them as the project proposal includes the ability to remove all of the vegetation within the Project Site, excluding the mining exclusion areas.

6.4 Minimise

6.4.1 Dust management

To monitor and control airborne dust which may arise due to meteorological conditions and mining activities, the mine operates under an alert level framework where meteorological conditions and total suspended particle (TSP) concentrations are monitored, and subsequent control measures are increased as the alert levels rise to a point where work is ceased at Level 4 (PDP, 2025). Dust management is set out in the draft Environment Management Plan appended to the substantive application.

6.4.2 Lizard survey and salvage

Within the context of the Project Site, the identified potential lizard habitats are relatively small in total extent, and capture and relocation of lizards (“salvage”) is an appropriate tool to minimise the potential effects described in Section 5.4.3.

Any lizard survey and salvage will occur in suitable weather conditions between October to April and will be undertaken in fine weather conditions between 12- 25 degrees.

We consider that there is little benefit to undertake further baseline surveys given the low density / lack of lizards, as well as the staged nature of the mining programme. Lizards have not been previously detected within the site, and if present, are likely at low density. For this reason, a pre-clearance survey / salvage approach is proposed for identified potential lizard habitats only.

There is likely a considerable time lag between this assessment, and vegetation clearance in parts of the Project Site (because of the staged nature of mining activity), allowing potential lizard habitats to expand. For this reason, areas adjacent to the identified habitats should be examined by the Project Herpetologist, and salvage should occur in these areas if habitats are suitable. The assessment of proposed clearance areas adjacent to identified habitats would include an assessment of habitat types (vegetation species, refuge potential), complexity and

connectivity to identified habitats. Survey and salvage effort will expand into this area if habitats are assessed as suitable, and if lizards were detected in neighbouring identified habitats.

6.4.2.1 Pre salvage survey

A minimum of five days of survey will occur at all identified potential habitats to inform subsequent steps and salvage requirements. This survey will involve the use of tracking tunnels and traps.

Trapping intensity in potential habitats will begin with approximately 10 m spacings of trapping tools (artificial retreats (ARs), gee minnow traps and pitfall traps – dependent on the habitat) micro-sited around habitat features to maximise detection. Tracking tunnels will also be deployed at approximate 10 m spacings to detect lizard presence over this period. The initial trapping period will be for 5 trap days in suitable weather as determined by the Project Herpetologist.

If lizards are detected at any time, salvage activities will begin immediately and trapping intensity will increase to 5 m spacing of trap tools in an approximate grid layout. The trapping period will extend for a maximum of 10 trap days, (including the 5 day survey period). The habitat area will be fenced with lizard-proof fencing to prevent lizards dispersing into the area from surrounding habitats.

If no lizards are detected after 5 days, trapping will cease in that area, and no further management will be required.

All lizards captured will be taken to the release site within 2 hours (Section 6.4.2.3).

6.4.2.2 Methods of lizard capture / salvage⁷

Lizard survey and salvage tools are consistent with the DOC Biodiversity Inventory And Monitoring Toolbox (DOC 2012). Methods include:

Live trapping using pitfall or mesh funnel traps:

Transects and/or grids of traps will be installed throughout each area that will be subject to vegetation clearance. Pitfall traps will be installed in combination with ARs, at roughly 10m intervals in close proximity to habitat features to ensure that a trap is located within the home range of as many terrestrial lizards in the area as possible.

Pitfall traps consist of a four-litre bucket that is dug into the ground so that the lip of the bucket sits flush with the soil surface (or slightly below). Buckets have small puncture holes at the base to allow water to drain through (ensuring lizards won't drown in case of heavy rain). A single layer of Onduline AR will be used to cover each pitfall trap and will be anchored down using pegs or weighed down using a rock or log. Traps will contain a damp sponge or moss, and pear or banana bait as well as leaves / grass for cover.

Mesh funnel traps will be filled with grass (to provide cover for trapped lizards), a piece of damp sponge or moss and pear or banana bait. Traps will be placed in shaded areas or covered in vegetation to prevent lizards overheating.

All traps and ARs will be installed at least 6 weeks in advance of trapping, although traps will be non-operational. All traps will be inspected within 24 hours from the last check in suitable weather.

⁷ Principle 5 of the 9 Principles of Lizard Salvage: Lizard salvage, transfer and release must use the best available methodology

Artificial retreats (ARs): A network of ARs will be deployed on the ground throughout edge vegetation and habitats that are to be cleared. ARs will be deployed as double-layered stacks and targeted to vegetation and micro-sites that represent potential terrestrial lizard habitat such as pampas tussocks, wood debris and slash piles. This tool requires at least a six-week lead in time for lizards to habituate to the novel items and begin utilising them as refuge. Following six weeks *in-situ*, ARs will be inspected daily for a minimum of five consecutive days. If possible, inspections will be made in the mornings before 9 am or late afternoons after 3 pm (or later), to maximise the likelihood of lizards being present.

Manual and visual searches:

Hand-searching will be undertaken throughout all relevant habitats during the initial 5-day survey period. This involves lifting and inspecting beneath any potential object of lizard refuge (e.g. logs, woody debris and sifting through leaf litter where present).

Mechanical habitat removal

If lizards continue to be trapped on the 10th day of trapping, mechanical methods will be employed to capture any remaining lizards. This includes using a digger with a claw attachment to 'scrape back' grassy habitats and deconstruct pampas tussocks.

6.4.2.3 Lizard transport and release

Lizards will be held individually in cloth bags in a secure, vented container out of the sun. Lizards will be transported to the release site or captive holding facility and will not be held for more than 2 hours.

Lizards will be released into prepared habitats (e.g. dense grassland and woody refuge piles) in the release site.

6.4.2.4 Risks and animal ethics considerations

Potential risks associated with the proposed management plan:

- *Overheating:* lizards will be placed in individual containers and kept in a cool place until released. Handling will be minimised to ensure they do not become stressed. All traps will be checked daily in the morning. Pitfall site selection, trap placement and equipment will follow the guidance of Turner et. al. (2024) to prevent elevated temperatures within the pitfall traps.
- *Overcrowding/competition:* overcrowding or competition at the release site is considered a low risk. Revegetation planting in this area is approximately 10-15 years old, having been previously mined and with no obvious source population for lizard dispersal. A lizard survey will be carried out at the release site prior to any lizard salvage and additional habitat features will be added.
- *Displacement:* A lizard-proof fence will prevent rehoming into the works area in areas where lizards are detected in adjacent habitat.
- *Injury/death:* lizards will be captured by a suitably trained herpetologist or individual. The LMP requires best practice and hygiene protocols to minimise the risk of injury, mortality or disease transmission.

Potential risks mentioned here will be minimised using an experienced herpetologist and suitably experienced field staff under the supervision of the herpetologist.

6.4.2.5 Management of post search/salvage debris

Preferably, vegetation and debris (if clean organic debris) will be deposited in areas to be retained adjacent to existing vegetation and left to naturally decay or in areas where planting is proposed in accordance with the recommendations for lizard habitat enhancement in Section 6.4.4.

If that is not possible, materials should be mulched and immediately disposed of. If material is stockpiled for any reason, and lizards have been detected within 20 m of the stockpile, the Project Herpetologist must deploy ARs around the debris pile which must be checked, and any native lizards salvaged. Debris piles which have been in place for greater than 12 weeks and adjacent to retained habitat must be treated using the full survey / salvage methodology outlined above as native lizards may migrate into the dense cover provided by the debris pile from surrounding areas.

6.4.3 Lizard release site ⁸

6.4.3.1 Location and rationale

The proposed lizard release site is a 1 ha area of replanted vegetation (10 – 15 years old) within Wainui Stream buffer (Map 6). The release site is connected to a wider buffer area and TIL reserved land to the east. There is no further mining proposed in the land directly to the south and this land to the south will be gradually rehabilitated once temporary ponds associated with mining activities are no longer required. As such, there is a larger habitat area outside of the designated lizard release site for translocated lizards to expand into.

Vegetation within the Wainui Stream buffer, outside of wet margins, generally includes pampas, gorse, tree lupin, wiwi, flax, and manuka scrub with rough pasture and occasional wilding pines. This habitat is broadly suitable for copper skinks, despite being weed-dominated (Figure 2). Further vegetation enhancement to benefit lizards by providing food and cover resources may be required to support lizard population growth in the long term. Revegetation for stream buffer and lizard habitat areas are described in the Natural Inland Wetland Management Plan (SLR, 2025c)⁹. We recommend that control of gorse and tree lupin are prioritised at the release site, and scrub pōhuehue (*Muehlenbeckia complexa*) is planted as replacement. Enhancement using habitat piles (wood debris) in the release site is described in Section 6.4.3.2.

The release site is easily accessible for monitoring and pest control. It is unlikely there is a resident lizard population within the release site, although a survey will be undertaken prior to any salvage. This survey will also inform the extent of lizard habitat enhancement required. Due to the long duration of the mining operation, and the staged nature of the vegetation stripping, it is not possible to refine when potential lizard habitats will be cleared, nor when the release site will be required.

The release site has been selected based on its ability to accommodate lizards within habitats similar to those from which they were captured. Further considerations included Principle 6 of the Lizard Salvage Guidelines (DOC 2019).

⁸ Principle 6 of the 9 Principles of lizard salvage: Receiving sites and their carrying capacity must be suitable in the long term.

⁹ Section 5.0 of Natural Inland Wetland Management Plan (SLR, 2025c).

Table 4: Assessment of lizard release site based on Principle 6 of the Lizard Salvage Guidelines (DOC 2019).

Principle relating to salvage and release	Description	Detail/Activity
1. The site must be ecologically appropriate and have long-term security	Resident lizard communities must be understood	Skinks are unlikely to be present within the release site, but a survey will be conducted prior to any lizard salvage. The timing constraints for this are discussed in Section 6.4.3.1.
	The release site must be an appropriate distance from the impact site	The release site is in a protected buffer area between the Central and Southern Blocks of the Project Site.
	The location must be within the species natural geographic range.	The site is within the natural range of the species.
2. The habitat at the site must be suitable for the salvaged species	Vegetation composition and size:	Vegetation within the release site comprises a mix of native and exotic species broadly suitable for copper skinks. Control of gorse and tree lupin is required with replacement planting of scrub pōhuehue.
	Habitat enhancement	Wood disk piles or log piles will be installed within the release site in clearings to provide additional stable refugia.
	Edge effects	Lizards will be released into an interior area of the release site to maximise the vegetation and predator control buffer, thus minimising edge effects.
3. The site must provide protection from predators	Habitat must protect from predators, or effective pest control must be in place. Must include full suite of predators including trapping for mice	Predator control will be undertaken to suppress rats, mice, ferrets, stoats, hedgehogs and possums. Details are provided in Section 6.4.5 and SLR (2025c).
4. The site must be protected from future disturbance	Land tenure must ensure long term protection from disturbance	The release site is within the Project Site and is within a 30 m riparian buffer excluded from future mining activity. Feral animals will be excluded from the release site with fencing.

Approximate
lizard release
site area
mid-Wainui
stream
margin



Approximate
lizard release
site area
upper-Wainui
stream
margin



Figure 2: Vegetation within the proposed lizard release site located in the background of these images.

6.4.3.2 Habitat enhancements at lizard release site

Woody material recovered from onsite works, such as wood disks from felled pine and pine slash logs will be used to create additional refugia. Wood habitat features will be placed in clearings in 2 x 2 x 1 m piles (approx.). Wood habitat features will be tightly packed to deter predators.



6.4.3.3 Predator control at release site

Pest animal control measures across the Central and Southern Blocks (including at the lizard release site) are described in Section 7.0 of the Natural Inland Wetland Management Plan (SLR, 2025c). Pest control for the lizard release site is summarised in Table 5.

Table 5: Pest control methods at the lizard release. Summarised from SLR (2025c).

Species	Control method	Detail
Rats (<i>Rattus rattus</i> , <i>R. norvegicus</i>),	Toxin control - brodifacoum	Bait stations on a 50 x 50 m grid. Toxin pulsed initially.
Mice (<i>Mus musculus</i>)	Toxin control - brodifacoum	Bait stations on a 25 x 25 m grid. Toxin pulsed initially.
Hedgehogs (<i>Echinaceus europaeus</i>)	Trap control – DOC 200 or BT200	Double set tunnels spaced 100 m apart. Traps to be baited with fresh rabbit meat, eggs or dried rabbit meat (Erayz).
Ferrets (<i>Mustela furo</i>), Stoats (<i>M. erminea</i>), Weasels (<i>M. nivalis</i>)	Trap control – DOC 250, although DOC200 for ferrets	Double set tunnels spaced 100 m apart. Traps to be baited with fresh rabbit meat, eggs or dried rabbit meat (Erayz).
Possums (<i>Trichosurus vulpecula</i>)	Trap control – self resetting traps, or manual kill traps	Traps spaced 150-200 m apart, 1 m off the ground affixed to a tree or post. Traps to be baited with commercial lures, or fruit.

Pest animal monitoring is not proposed due to constant reinvasion making it unlikely to show a clear response to control (SLR 2025c). A record of maintenance and bait / toxin top-ups is to be kept to assess bait take as an indirect measure of predator activity.

6.4.4 Contingency actions ¹⁰

Lizards can inhabit unlikely locations and sometimes be found in surprising abundance. Therefore, Table 6 identifies potential issues that could arise and contingency actions to address them.

¹⁰ Principle 9 of the 9 Principles of Lizard Salvage: Contingency actions are required when lizard salvage and transfer activities fail.

Table 6: Proposed contingency actions.

Situation	Description	Contingency Action(s)
Higher number of lizards captured than expected	During the salvage, a higher number of lizards are being captured than expected or numbers of lizards in traps are not decreasing.	If the number of lizards captured by the 10 th trapping day isn't declining, destructive searches and mechanical habitat removal is proposed to remove any remaining habitat onsite so lizards are unlikely to disperse back into the site.
Threatened or unexpected lizard species encountered	Threatened lizard species not previously considered or anticipated to occur onsite are found.	If encountered, the release site must be assessed to see if the unexpected species is suitable for release. The Project Herpetologist will contact DOC to inform them of the find and discuss an alternative release site if required. Survey methods will be reviewed and intensified to ensure they are likely to capture any other lizards of that species.

6.4.5 Incidental discovery protocol

The following incidental discovery protocol (IDP) has been described for the scenario in which a lizard is discovered during works, following implementation of the lizard salvage.

If a lizard is discovered:

- All activities in a 10 m radius around where the lizard was observed must cease immediately and searches for any other lizards must be carried out. If the lizard came from a habitat feature (e.g. log pile, pampas tussock) this should be fenced off with lizard-proof silt fencing until it can be thoroughly searched by a suitably experienced person.
- The Project Herpetologist must be notified within 2 hours of the sighting.
- If the lizard is sighted, provide details such as:
 - Colouration and patterning.
 - Shape and size (e.g. robust or slender, approximate length).
 - Location it was found in.
- Where possible, the lizard should be captured and placed into a breathable container with some vegetation inside to provide cover. The container must be placed out of the sun and kept cool. The following should also be recorded:
 - Date and time of capture.
 - Location.
 - Weather during capture.

- Presumed species.
- Photographs of the animal and capture location.
- The lizard shall be kept until the Project Herpetologist is able to attend and identify the species and assess the health of the lizard. If the lizard is healthy, it should be released into the created lizard release site, or at another suitable location at the discretion of the Project Herpetologist and DOC.
- If a deceased lizard is found, it should be photographed, and the Project Herpetologist must be contacted. The Project Herpetologist will then consult with DOC on how to proceed.
- If an injured lizard is found, the Project Herpetologist must be contacted immediately for advice on how to proceed. A veterinarian may need to be contacted for advice. DOC will also be notified of the finding.

6.4.6 Adaptive Management

Minor flexibility or adaptations to the current methods proposed in this LMP may be made at the discretion of the Project Herpetologist. This will enable the appropriate management of lizard populations that are encountered during the lizard salvage within the site, habitat quality and type of species encountered.

6.5 Compensation

If lizards are present, the mitigation described above (i.e., lizard salvage) is not considered sufficient to provide an overall protective benefit to the lizard population because imperfect salvage methods and complex habitats are likely to result in a net loss of lizards from the site.

TIL proposes monetary compensation to a local environmental group to support wildlife (including lizards) in the local area through pest control, weed management, or habitat enhancement. TIL proposes that the monetary amount reflects the number of lizards that are salvaged from the affected site. The following amounts are proposed:

- No lizards salvaged = no monetary compensation required
- ≤ 20 individual Not Threatened or At Risk species = \$10,000.00
- 21 – 50 individual Not Threatened or At Risk species = \$15,000.00
- ≥ 50 individual Not Threatened or At Risk species = \$20,000.00
- Any Threatened lizard captured = \$1,000.00 per lizard.

TIL proposes to consult with mana whenua and other stakeholders to determine an appropriate recipient group for the compensation. The group will be confirmed prior to the first lizard salvage, with compensation payable as salvages are completed. Compensation payments are cumulative (i.e., a maximum of \$20,000 is payable unless a threatened lizard is captured).

We consider that this is an appropriate approach because salvage, habitat creation and predator control components of this proposal have minimal benefit at a local population level if there is no dispersal between the release site and habitats outside of the Project Site. Compensation provides an opportunity to benefit lizards in the local area.

7.0 Post release monitoring ¹¹ and reporting ¹²

7.1 Reporting

Lizard salvage outcomes and the results of habitat inspections (described in Section 5.3) will be reported by the Project Herpetologist to DOC (per requirements of the Wildlife Approval). Reports will be provided by 30 June of the year the activity took place. Reports will include how the Lizard Management Plan was implemented including any difficulties encountered with capture and handling, and what contingency actions were required. This report will also include:

- Species and number of animals released;
- Detailed maps of the capture and release location; and
- A description of the habitat quality and extent, survey effort and lizard survey results.

ARDS cards will be submitted to DOC by the Project Herpetologist within 1 month following the end of the salvage.

7.2 Post-release monitoring

Post-release monitoring will be triggered if more than 50 lizards of an 'At Risk' species are salvaged and released within the release area.

Monitoring will include annual repeat surveys using methods described in Section 6.4.2.2, including live traps, artificial retreats and visual searches (but will not include destructive searches). Monitoring will have the objective of assessing population persistence and breeding (i.e. gravid females, or juveniles present in the population) for up to 3 years following release.

8.0 Wildlife Act offences (s7, cl 2(1)(l) of the FTAAs)

The Substantive Application Report confirms at that there is no criminal history or involvement in any pending criminal proceedings of the applicant, company director, trustee, partner and anyone else involved with the application, in respect of offences under the Wildlife Act.

¹¹ Principle 7 of the 9 Principles of Lizard Salvage: Monitoring is required to evaluate the salvage operation.

¹² Principle 7 of the 9 Principles of Lizard Salvage: Reporting is required to communicate outcomes of salvage operations and encourage process improvements.

9.0 Consultation (s7, cl 2(1)(n) of the FTA)

TIL has undertaken consultation with mana whenua and the Department of Conservation for this Application, and specifically regarding management of lizards at the Project Site. Details are provided in the substantive application.

10.0 Additional supporting documentation (s7, cl 2(1)(o) of the FTA)

This assessment was informed by the documents referenced throughout and listed in the references (Section 11).

11.0 References

Clough and Associates, 2025: Taharoa Ironsands Central and Southern Blocks: Archaeological Assessment. Prepared for Taharoa Ironsands Limited.

Department of Conservation, 2012: Herpetofauna inventory and monitoring toolbox. Including DOCDM-760240: Pitfall trapping, DOCDM-725787 – Systematic searches, DOCDM-797638 – Artificial retreats, DOCDM-783609 – Funnel traps.

Department of Conservation, 2019. *Key principles for lizard salvage and transfer in New Zealand*. Prepared by the Department of Conservation Lizard Technical Advisory Group.

Department of Conservation, 2023. Reducing the impacts of development on New Zealand lizards Guidance for developers, consenting authorities and ecologists/herpetologists. Prepared by the Department of Conservation Lizard Technical Advisory Group.

Department of Conservation, 2024: Bioweb database herpetofauna records. Accessed December 2024.

Hitchmough, R.A.; Barr, B.; Knox, C.; Lettink, M.; Monks, J.M.; Patterson, G.B.; Reardon, J.T.; van Winkel, D.; Rolfe, J.; Michel, P. 2021: Conservation status of New Zealand reptiles, 2021. *New Zealand Threat Classification Series 35*. Department of Conservation, Wellington. 15 p.

PDP, 2025: Taharoa Ironsands Central and Southern Block Fast-track Mining Project: Air Quality Assessment

Roper-Lindsay, J., Fuller S.A., Hooson, S., Sanders, M.D., Ussher, G.T. 2018. Ecological impact assessment. EIANZ guidelines for use in New Zealand: terrestrial and freshwater ecosystems. 2nd edition.

SLR, 2025a: Taharoa Ironsands Central and Southern Block Mining Project: Ecological Impact Assessment for wetlands and terrestrial vegetation.

SLR, 2025b: Taharoa Ironsands Central and Southern Block Mining Project: Ecological Assessment – Fauna

SLR, 2025c: Taharoa Ironsands Central and Southern Block Mining Project: Draft Natural Inland Wetland Management Plan

Tonkin + Taylor, 2025: Substantive Application for Taharoa Ironsands Southern and Central Block for the Fast Track Approvals Application.

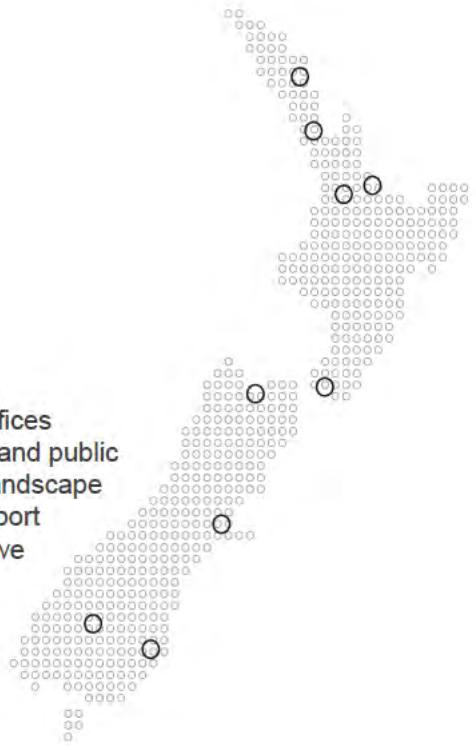
Turner, M. K., Kelly, D., & Lettink, M. (2024). Concrete refuges and the influence of temperature on artificial refuge occupation by terrestrial lizards. *New Zealand Journal of Zoology*, 52(5), 885–898.

Van Winkel, D., Baling, M., Hitchmough, R. (2020). Reptiles and amphibians of New Zealand. Bloomsbury Publishing.

Appendix 1: Wildlife Approval checklist

Together. Shaping Better Places.

Boffa Miskell is a leading New Zealand environmental consultancy with nine offices throughout Aotearoa. We work with a wide range of local, international private and public sector clients in the areas of planning, urban design, landscape architecture, landscape planning, ecology, biosecurity, Te Hīhiri (cultural advisory), engagement, transport advisory, climate change, graphics, and mapping. Over the past five decades we have built a reputation for creativity, professionalism, innovation, and excellence by understanding each project's interconnections with the wider environmental, social, cultural, and economic context.



www.boffamiskell.co.nz

Whangarei 09 358 2526	Auckland 09 358 2526	Hamilton 07 960 0006	Tauranga 07 571 5511	Wellington 04 385 9315	Nelson 03 548 8551	Christchurch 03 366 8891	Queenstown 03 441 1670	Dunedin 03 470 0460
---------------------------------	--------------------------------	--------------------------------	--------------------------------	----------------------------------	------------------------------	------------------------------------	----------------------------------	-------------------------------

Proof of consultation

From: Harach, Olivia OH <[REDACTED]
Sent: Wednesday, 25 June 2025 2:26 pm
To: Holly-Marie Rearic; Stephanie de Groot
Subject: FW: Invitation to Waitomo District Council to meet or provide written feedback – Taharoa Ironsands Limited Fast-track Applications
Attachments: Consultation letter to Waitomo District Council dated 24 June 2025.pdf



Olivia Harach
Taharoa Ironsands Ltd
P
[REDACTED]

From: Harach, Olivia OH
Sent: Wednesday, 25 June 2025 2:18 pm
To: [REDACTED] info@waitomo.govt.nz
Cc: Coffey, Wayne WC <[REDACTED]
Subject: Invitation to Waitomo District Council to meet or provide written feedback – Taharoa Ironsands Limited Fast-track Applications

Good afternoon Predrag

Please see the **attached** letter in relation to applications that TIL is preparing for the Central and Southern Block Project and Northern Block Project under the Fast-track Approvals Act 2024.

The purpose of the letter is to offer the Council the opportunity to discuss the applications with TIL and/or for the Council to provide written feedback on the applications.

Please let me know if you have any queries.

Regards
Wayne



Taharoa Ironsands Ltd

24 June 2025

BY EMAIL: info@waitomo.govt.nz; [REDACTED]

Attention: Predrag Draca

Waitomo District Council
15 Queen Street
Te Kuiti 3910

Dear Predrag

Taharoa Ironsands Limited – Fast-track Approvals Act 2024 applications

1. As you know, Taharoa Ironsands Limited (**TIL**) owns and operates the Taharoa Ironsand Mine which has been in operation since 1973 and accesses the largest iron sand deposit in New Zealand.
2. The Mine is divided into blocks known as the Northern, Central and Southern Block which are all located on Taharoa C Block, as well as the Eastern Blocks and the Te Mania Extension which are located on adjoining land.
3. TIL needs to replace its resource consents relating to the Central and Southern Blocks to continue operating the existing Mine and to enable expansion of the Mine in the future. TIL sought to do so by making an application in 2020 under the standard resource consenting process under the Resource Management Act 1991 (**RMA**). The consenting process under the RMA was lengthy and TIL was not satisfied with the decision, which led it to appeal the decision to the Environment Court on 12 December 2024.
4. Since the appeal was filed, the Fast-track Approvals Act 2024 (**FTAA**) has been enacted. The FTAA establishes a fast-track environmental approvals regime for projects of national and regional significance in New Zealand.
5. The reconsenting of the Central and Southern Blocks of the Mine has been recognised by the Government as having regional and national significance and has been directly referred to utilise the Fast-Track approval process. The FTAA therefore provides an alternative, and suitable, consenting pathway for the Central and Southern Blocks. New mining in the Northern Block has also been directly referred by the Government to utilise the Fast-track process on account of its regional and national significance.
6. We are now preparing our substantive applications for both projects which will be considered under the FTAA. We are intending to file both applications with the Environmental Protection Agency in June/July 2025. Enviser is managing the preparation of the applications on behalf of TIL with input from a range of technical consultants, including Grant Eccles (planner) of Tonkin & Taylor Limited. Tonkin & Taylor has provided a high-level summary of each application in **Appendix A**.
7. We are writing to provide the Council with an opportunity to discuss the applications or otherwise provide written feedback (if you are not willing to meet), while the applications are being prepared.
8. We are looking to arrange a meeting to discuss the applications as soon as possible. Otherwise, we would appreciate that any written feedback is provided by 11 July 2025.

9. If you would like to provide written feedback or discuss the applications with us, can you please let us know using the following email address: [REDACTED]

Yours faithfully

Wayne Coffey
Managing Director and CEO of Taharoa Ironsands Limited

Appendix A

Taharoa Ironsands Mine – Project summary for pre-application consultation

- **Northern Block Mining Project**
- **Central and Southern Block Mining Project**

1 Overview

Taharoa Ironsands Limited (TIL) operate an iron sand mine at Taharoa, on the West Coast of the North Island, approximately 8 km south of Kawhia Harbour. The Taharoa Mine has been in operation since 1973 (owned by New Zealand Steel until 2017). The mine site covers an area of approximately 1,300 hectares, primarily on Māori land legally described as the Taharoa C Block and the part of the coastal marine area (CMA) legally defined as Port Taharoa (**mine**).

For the purposes of mining activity, Taharoa C Block is divided into blocks. As shown on the attached plan:

- (a) the area of the site to the north of the Mitiwai Stream is known as the Northern Block.
- (b) the area of the site between the Mitiwai Stream and the Wainui Stream is known as the Central Block; and
- (c) the area of the site to the south of the Wainui Stream is known as the Southern Block.

The Central and Southern Blocks are currently operated under a suite of resource consents granted in 2006.¹ Mining activity has not historically occurred in the Northern Block.

TIL is now preparing applications for the necessary resource consents, wildlife permits and archaeological authorities under the Fast-track Approvals Act 2024 (FTAA) to authorise:

- the extraction of sand (and associated activities) on the Northern Block (known as the Northern Block Mining Project); and
- the continuation of sand extraction (and associated activities which support the entire mine, including its export operation) on the Central and Southern Blocks and in the CMA (known as the Central and Southern Block Mining Project).

The following describes the proposed mining and associated works which are subject to the applications, details the resource consents and approvals sought and provides a high-level summary of the potential effects on the environment of each project at this stage. As the applications are currently being prepared, this information is based on the work completed as of 01 May 2025, and is subject to change.

¹ TIL also hold separate resource consents for mining of (i) the “Eastern Block” granted in 2018 (mining now completed and rehabilitation underway), and (ii) the “Te Mania Extension” adjoining the Eastern Block granted in 2022 (mining yet to commence), and (iii) a small area in the Northern Block known as “Pit 1” granted in late 2024 (mining currently in progress). Mining at these locations relies on the water take resource consents and the coastal permits granted for the Central and Southern Blocks.

2 Description of proposed works

TIL propose to mine ironsand throughout the Northern, Central and Southern Blocks excluding areas where mining restrictions will apply. The areas where mining activity will not take place are within 100 m of Mean High Water Springs, 30 m of perennial water bodies (Mitiwai Stream, Wainui Stream and Lake Taharoa), and within already identified urupa and archaeological re-interment areas on the mine. Other mining exclusion areas may be identified as part of the completion of technical assessments that are currently underway. Any additional mining exclusion areas that are identified by the technical assessments will be included in the substantive FTAA applications.

Whilst the process to extract, process and export the ironsand can and does vary depending on the nature of the deposit being mined at the time, it follows the same broad steps. These activities, which are sought to be authorised as part of the Central and Southern Block Project, include:

1. **Vegetation, topsoil and overburden removal, including harvesting of trees with commercial value (pines).** Useful native species are removed prior to stripping of topsoil for use in the eco-sourced nursery on site. Topsoil is stockpiled on-site for use in future rehabilitation activities.
2. **Extraction and processing of Ironsand.** Raw Ironsand is extracted using various methods and equipment depending on ground conditions. In upper layers, standard earthmoving machinery such as excavators, bulldozers, and trucks are used to collect the ironsand and deposit it into a Dry Mining Unit (DMU). The DMU mixes the ironsand with water to form a slurry, which is then pumped to a treatment plant for titanomagnetite extraction.
3. During this process, groundwater and surface water may enter the active excavation area. To maintain dry working conditions, this water may be pumped out as required. However, as mining progresses to deeper layers, maintaining a dry pit may become impractical. In such cases, a cutter-suction dredge is used in a water-filled pond. The dredge floats on the water and uses a submerged dredge head to cut, fluidise, and pump the Ironsand slurry through a pipeline to the treatment plant. The dredge is capable of operating at depths of 8 to 15 meters below the pond surface. In some instances, a long-reach excavator may also be used to extract material from within the pond.
4. **Processing.** The extracted ironsand is transported to a centralised processing plant where it is concentrated and processed. The ironsand is refined using screening and gravity separation. The ironsand is mixed into a slurry and pumped through a seabed pipeline to a bulk carrier ship moored at the Port of Taharoa. The export pipelines run from the processing and storage facility located on land to a Single Buoy Mooring (SBM), located approximately 3.5 km offshore.
5. **Ship loading and dewatering.** Bulk carrier ships moor at the SBM to receive the ironsand in slurry form from the export pipelines. Each ship contains dewatering equipment and the resulting freshwater, containing residual fine suspended material (inert, inorganic geological material) that is removed from the ironsand slurry, is discharged from the ship to the sea. The discharge forms a buoyant plume that floats on the seawater surface before dispersal and dilution. Ship loading operations are currently undertaken approximately 20 times per year and will increase in frequency in future as production increases up to a projected maximum of 35 times per year. Each ship loading activity takes approximately 90 hours (of pumping time) however weather conditions have an influence on loading timeframes.

6. **Tailings disposal and rehabilitation of mined areas.** The tailings (ferrous and non-ferrous sand, silts and clays) which are separated from the exportable product are pumped as a slurry to tailings disposal areas. The discharged slurry dewateres by gravity, with the drainage water collected and directed into a settlement pond or ponds. Once the tailings have dewatered, mechanical plant (excavators and dozers) redistribute the material to form the grade and levels required by the rehabilitation plan for that area. Following this the land may be stabilised, top soiled and replanted.

To operate the mine, the process requires the abstraction of water from the Wainui Stream via a constructed dam incorporating a fish pass, and the discharge of stormwater to the Wainui Stream and the discharge of process water to settling ponds. Excess stormwater and process water is discharged to the CMA via the ship loading pipelines.

The activities sought to be authorised as part of the Northern Block Mining Project include (but are not limited to):

- (a) vegetation, topsoil and overburden removal, and excavation and processing of iron sand above and below the water table (as above);
- (b) the transportation of that product via temporary pipelines to the established processing plant on the Central and Southern Block;
- (c) processing (as above);
- (d) discharge of process water to land; and
- (e) tailing disposal and rehabilitation of mined areas (as above).

The Northern Block Mining Project will rely on / be supported by the processing infrastructure located on the Central and Southern Blocks. It will also rely on / be supported by the consents being sought for the Central and Southern Block to take and use water from the Wainui Stream, discharge of stormwater to the Wainui Stream and the CMA, discharge of process water to the CMA and transport of processed product from the processing facility through the ship-loading pipelines to the CMA. No changes are being proposed to the existing water take limits and discharge limits to facilitate mining of the Northern Block.

3 Approvals sought

3.1 Resource Management Act 1991

A summary of the resource consents that are required for the Northern, Central and Southern Blocks is set out below.

3.1.1 Resource consents required for the Northern Block

National Environmental Standard for Freshwater 2020 – consents to clear vegetation and undertake earthworks within and within 10m of a natural inland wetland. Consents are also required to take, use, dam, or divert water within and within 100 m of a natural inland wetland and to discharge water within and within 100 m of a natural inland wetland.

National Environmental Standard for Commercial Forestry 2017 – consent to harvest pine trees within Class 8e land.

Operative Waikato Regional Plan – consents for soil disturbance and vegetation clearance activities, diversion and taking of groundwater and surface of water associated with mining above and below the water table, discharge of a contaminant to land or water (process water and placement of tailings) and for overburden disposal to land.

Additionally, resource consent is required under the Operative Waitomo District Plan for the potential disturbance of archaeological sites recorded in the Plan - this consent applies to the Northern Block only given that mining has occurred since the early 1970's on the Central and Southern Blocks.

3.1.2 Resource consents required for the Central and Southern Blocks

The resource consents set out above are also required for the Central and Southern Blocks.² In addition, the following resource consents are required for the Central and Southern Blocks Project:

Operative Waikato Regional Plan – consents for the damming, diversion and taking of surface water and groundwater, for stream bed disturbance, and for the discharge of stormwater to surface water.

Operative and Proposed Waikato Regional Coastal Plans – consents for the use and occupation of the Coastal Marine Area by the export pipelines and the SBM, for discharges to and depositions in the CMA from shiploading activities, and for the discharge of stormwater from the export pipelines.

3.2 Wildlife Act 1953

A wildlife permit will be required to manage lizards if they are identified prior to vegetation removal or ground disturbance works.

3.3 Heritage New Zealand Pouhere Taonga Act 2014

Archaeological authorities will be sought due to the potential for currently undiscovered archaeological features to be disturbed by mining activities (excluding urupa and archaeological areas reserved from mining which will not be disturbed).

4 Benefits of the Projects

The continuation of the mining activity on the Taharoa C Block that will be facilitated by the approvals sought under the FTAA will generate significant regional and national benefits. The Central and Southern Block Mining Project and Northern Block Project will directly contribute billions to the New Zealand economy (through employment, income for landowners, business for regional supplies and the payment of taxes).

The mine provides significant employment opportunities for the community, particularly local Māori. Over 82% of income earned by local Ngāti Mahuta comes from employment at the mine. TIL has a core workforce of 170-80 people but employs upwards of 300 staff and contractors.

TIL relies on locally sourced goods and services including the supply of electricity and services from surrounding areas including Kawhia, Te Kuiti, Otorohanga, Te Awamutu and Hamilton. TIL also relies on specialist sub-contractor support including the maintenance and management of specialised mine machinery and equipment. The support TIL relies on (and will continue to rely on) from

² Excluding the resource consent required for archaeological site disturbance.

surrounding centres for the Northern Block Project and Central and Southern Block Mining Project will inject billions into the local economy over the life of the consents sought for the Project.

The mine also provides essential benefits to the local Taharoa Village which was established around the mine and exists today because of the substantial financial contribution the mine makes every year.

5 Summary of potential adverse effects on the environment

The following high-level summary of effects on the environment is based on technical assessments previously completed in relation to mining of the Central and Southern blocks. These assessments are currently being updated, and additional assessments are being completed for mining of the Northern Block. A full assessment of effects supported by technical assessments will be included in the applications for the Northern and Central/Southern Blocks respectively.

5.1 Effects common to the Northern, Central and Southern Blocks

5.1.1 Effects on terrestrial ecology (including bats, birds, lizards)

Disturbance from mining activities has the potential to have adverse effects on wetland and grassland bird species. The loss of existing grassland due to the mining activity may also result in potential injury or death of various threatened native skink present in low numbers in the grassland. The overall level of effect on terrestrial ecology has been assessed as being **low** with the provision of an over-arching Environmental Management Plan (EMP), including an Avifauna Management Plan, Bat Management Plan and a Lizard Management Plan, and imposition of appropriate conditions such as a requirement for there to be a 30 m planting buffer around all natural water bodies. Subject to the imposition of conditions, the overall level of effects on terrestrial ecology has been assessed as **minor**.

5.1.2 Effects of mining below the water table

When mining activity interacts with groundwater there may be the potential for adverse effects on surface freshwater bodies if there is a hydraulic connection between the groundwater and surface water. This connection will be carefully monitored. Any adverse effects on the primary freshwater bodies on the site (the Mitiwai Stream and the Wainui Stream) can be avoided and mitigated through consent conditions including for example, requirements to maintain a minimum flow within the streams.

5.1.3 Effects of discharge to land

The discharge of tailings and surplus process water to land has the potential to cause adverse effects on landform, groundwater and nearby waterways. The tailings material is re-formed as close as practicable to the original landform. The discharge of surplus process water does not result in contamination of groundwater due to the natural filtering provided by the sandy ground conditions. Overall, the adverse effects of discharges to land have been assessed as **less than minor**.

5.1.4 Land disturbance effects

The mining operation is located in a high-risk erosion area and the mining and stockpiling of iron sand has the potential to result in adverse effects on land stability. Given that the mine has a good operational history with no erosion issues requiring mitigation, a rehabilitation process and

revegetation plan is followed for disturbed areas, and perennial waterbody mining setbacks are imposed, any adverse effects can be considered **negligible**.

5.1.5 Archaeological effects

Taharoa C Block is and has always been Māori land which means that there is elevated potential for accidental discovery of koi iwi and other taonga in the dune environment of the area. Ngāti Mahuta derived tikanga and protocols apply when discoveries of koiwi and taonga occur in the Taharoa dune environment as a result of mining activity, and that tikanga/protocol is reflected in existing and proposed consent conditions. Defined urupā are located within the dune system where accidentally discovered koiwi are interred with appropriate tikanga being observed. A buffer in which no mining occurs is observed around each urupā.

All of these measures and practices will continue and mitigate the potential adverse effects in relation to archaeology to **less than minor** levels.

5.1.6 Cultural effects

In considering cultural effects, it is important to note the cultural benefits the ongoing operation of the mine has for Ngati Mahuta as tangata whenua. These benefits include employment benefits, royalties, and support for the local community. Ngati Mahuta, though the Taharoa C Block Incorporation, own the land on which the mine operates and is paid significant royalties from the mine. The mine also supports the employment and growth of Ngati Mahuta whanau. The local employment opportunity generated by the mine has allowed the local community to retain members of the community who may have otherwise moved away to seek employment elsewhere and lost their connection to the land.

TIL understand the views of the respective Taharoa Marae and Te Runanga in relation to the potential cultural effects of the Central and Southern Block Project. In summary, at a high-level:

The damming of the Wainui Stream has the potential to have adverse effects on the health of Lake Taharoa and its indigenous fishery, an important matter to Ngāti Mahuta. The maintenance of the effectiveness of the fish pass at the dam in the Wainui Stream is important to ensure the presence of indigenous fish species in the stream and lake upstream of the dam continues.

The maintenance and monitoring of baseflow in the Mitiwai Stream is also an important matter from a cultural perspective. TIL has engaged expert consultants to monitor the stream to ensure that TIL understands the potential effects of its mining activity on the Stream, which will be managed through consent conditions. Rehabilitation of the mine site to a sustainable landform and land cover is also an important matter to Ngāti Mahuta. Representatives of Ngāti Mahuta have shared their desire for the land to be returned to its natural state following mining activity (being rolling sand dunes with some pockets of vegetation). In that regard, TIL has developed and is implementing an overall Site Rehabilitation Plan and updated Conceptual Site Closure Plan in place to be implemented in the event that the mine closes in the future.

TIL propose to consult with the respective Taharoa Marae and Te Runanga in the preparation of the various management plans that govern the management of effects at the mine. Such consultation and engagement benefits both parties – TIL will gain the benefit of access to the skills and expertise that reside within the marae and hapu whanau, while marae and hapu whanau will have the opportunity to influence the content of management plans that will play an important part in managing the ongoing effects of the mining activity. TIL will also propose the provision of a website

which includes monthly monitoring records to communicate data to mana whenua and the community.

5.1.7 Air Quality Effects

The mine is located in an isolated location subject to extreme westerly winds. In this environment, there is potential for wind-blown sand from the mine site to generate adverse effects on adjoining and adjacent sites to the mine, including in Taharoa Village. TIL implement a range of avoidance and mitigation techniques to control such emissions including the erection of fencing to trap sand particles, placing ground cover (for example, coconut matting) on exposed areas, using mobile and automated fixed watering systems on internal site roads, enforcing vehicle speed limits, and progressively rehabilitating mined out areas. These measures mean that the mine site can operate in accordance with the relevant permitted activity rule of the Waikato Regional Plan with regards to air quality. TIL proposes to implement a Dust Management Plan to manage the implementation of these dust prevention mechanisms. Although there remains the potential for off-site discharges of dust due to the coastal environment, these discharges are highly unlikely to result in adverse effects to human health. Acoustic Effects

The mining activities have the potential to have adverse noise effects on key sensitive receptors on sites adjoining the Northern Block (1891 Taharoa Road, 1891A Taharoa Road, Te Kōraha Marae and 25 Rotopuhoe Road). However, these receptors are located several hundred metres from where mining will occur on the Northern Block and given this separation distance, it is expected that the works will be able to be managed to comply with the Waitomo District Plan daytime and nighttime noise limits. As a result, any potential adverse effects from noise from mining on the Northern Block on sensitive receivers is expected to be **less than minor**.

Mining on the Central and Southern Blocks has been continuous since the 1970s and benefits from existing use rights with respect to noise levels and associated acoustic effects. Notwithstanding this, noise levels are expected to be compliant with District Plan noise limits. TIL will continue to adopt the best practicable option to ensure that the emission of noise from these blocks does not exceed a reasonable level for any nearby sensitive receptors.

5.2 Effects relating to the Central and Southern Blocks only

5.2.1 Effects of damming Wainui Stream

Authorisation of the dam in the Wainui Stream will result in a similar water regime to what is currently present. Fish passage will be provided for via the monitoring and maintenance of a fish pass which achieves the intended purpose of allowing grey mullet and other targeted species to be able to navigate upstream to Lake Taharoa. The downstream migration of juvenile native fish can be adequately addressed through consent conditions which include the retention of a minimum flow within the fish pass and downstream of the dam, as well as monitoring of fish pass performance. As a result, the effects of the dam on fish passage has been assessed as **negligible**.

5.2.2 Effects on water quantity

Water is extracted from the impounded section of the Wainui Stream for mining and shiploading processes. Separate water take consents are held for the mining and shiploading takes and the consents cannot be exercised at the same time. The mine is currently operating within the historically consented limits for water abstraction and no further water quantity is required for the continued operation of the mine. The Wainui Stream catchment is not over-allocated and there are

no permits held by any other party to take water from the stream. As a result, adverse water quantity effects are avoided.

5.2.3 Effects of water take on marginal wetlands

The proposed water takes have the potential to have adverse effects on marginal wetlands around the edges of Lake Taharoa. Noting that the wetlands have acclimated to the lake levels that have been experienced since the installation of the dam in the Wainui Stream in the early 1970's, the magnitude of these effects has been assessed as **low** given that the water takes will be operated in a similar manner to what has been historically occurred at the mine. Importantly, TIL is proposing to retain existing conditions that require water takes to cease if the lake levels reach a certain minimum point. Conditions will also be proposed that require ongoing monitoring of the lake margin wetlands and management responses to be implemented if the lake level remains low for an extended period and the wetlands show signs of stress (other than that caused by natural seasonal conditions).

5.2.4 Effects on benthic fauna

The proposed ship-loading infrastructure including pipelines on the seabed and the tethering mechanism for the SBM will continue to occupy part of the seabed and impact on a small amount of available subtidal sandflat habitat. Given the small percentage of the available subtidal sandflat habitat this represents, this is assessed as having a low magnitude of effect on benthic ecology. The effects of constructing the pipeline have also been assessed as being **low**.

5.2.5 Effects on fish and seafood species

The discharge from the ship loading process has the potential to have adverse effects on existing habitat for fish and seafood species. Given the relatively infrequent and short-term nature of the discharge and the highly mobile nature of fish species the potential adverse effects are assessed as **negligible**. The presence of green lipped mussels in the area of the discharge indicates that ongoing ship loading discharges do not inhibit mussel colonisation and has a **negligible** effect on seafood resource species.

5.2.6 Effects on marine mammals

A number of marine mammal species can be present in the wider marine area around Port Taharoa such as Māui dolphins, common dolphins, southern right whales and Orca/killer whales. Given the low level of risk posed by the ship loading operation and the fact that it has been occurring in the vicinity since the early 1970's, the overall risk of adverse effects for marine mammals is assessed as **negligible**. Nevertheless, to recognise the sensitivity of the marine mammals that traverse the area, TIL propose conditions that require an underwater noise survey to be undertaken if 35 ship visits occur in a 12 month period, in order to inform best practice underwater noise measures.

5.2.7 Effects on coastal processes

TIL seeks to continue the ability to discharge up to 75,000m³ per day of ship loading water, including freshwater and fine sediment, up to a maximum of 7,500,000m³ per year. As a result of dilution and dispersion of the sediment plume provided by oceanic conditions, the effect of this discharge on coastal processes has been assessed as being **less than minor**.

5.2.8 Effects of discharges in the Coastal Marine Area (CMA)

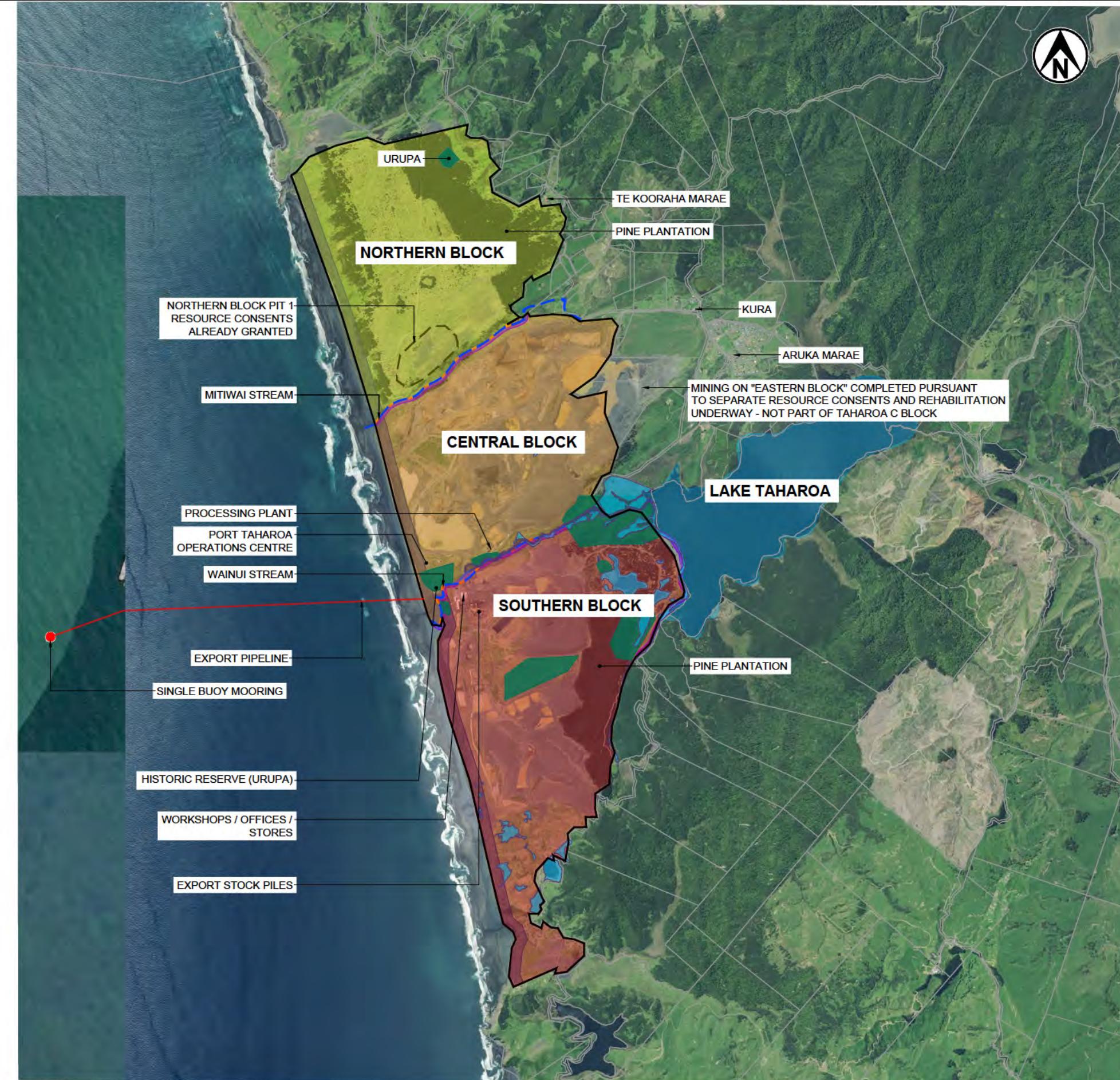
The potential adverse effects of the sediment discharge from the ship-loading events have been addressed above. The discharge includes some trace levels of naturally occurring contaminants in the ironsand that is pumped in slurry form into the ship. Because of the extremely low levels of the naturally occurring contaminants, and the dilution provided by the sea water, the discharge will not result in any measurable toxicity effect on benthic fauna.

TIL is seeking consent to continue to discharge excess process water and stormwater to the CMA at a rate of 32,000m³/day. This discharge occurs infrequently and when there is no suitable alternative to provide for the discharge on land - primarily at times of prolonged heavy rainfall. The potential ecological effects from the process water/stormwater discharge are likely to be even less than those of the ship loading discharge which were assessed to be less than minor. Correspondingly, no further actions to avoid, remedy or mitigate potential effects from the process wastewater and stormwater discharges are required apart from monitoring of the discharge quality and composition.

5.2.9 Effects on navigation safety

The continued ship movements to and from the Port of Taharoa and the occupation of the CMA by ship loading infrastructure have the potential to have adverse effects on navigational safety of other users of the CMA. However, the use of this area for recreational watercraft and commercial vessels is infrequent and the movement of ironsand export ships has been established in the area since the early 1970's. No more than one ship can access the mooring buoy at one time. Furthermore, the Port of Taharoa is operated in compliance with the New Zealand Port and Harbour Marine Safety Code, the Harbourmaster previously had no objection to the continued activity and several improvements have been implemented since the granting of the now expired resource consents in 2002. For these reasons, potential adverse effects on navigation safety have been assessed as **less than minor**.

LEGEND	
	STREAM
	PROPERTY BOUNDARIES
	MINING LICENCE AREA (TAHAROA C BLOCK)
	NORTHERN BLOCK
	CENTRAL BLOCK
	SOUTHERN BLOCK
	30m PERENNIAL WATER BODY / STREAM SETBACK
	100m MHWS SETBACK SUBJECT TO SURVEY
	ARCHEOLOGICAL AREAS RESERVED FROM MINING
	WETLAND



From: Harach, Olivia OH [REDACTED]
Sent: Friday, 27 June 2025 11:41 am
To: Holly-Marie Rearic; Stephanie de Groot
Cc: Tim Fletcher
Subject: FW: Invitation to Waikato Regional Council to meet or provide written feedback – Taharoa Ironsands Limited Fast-track Applications [MERWNZ-MERWLIB.FID900086]
Attachments: Consultation letter to Waikato Regional Council dated 24 June 2025.pdf



Olivia Harach
Taharoa Ironsands Ltd
P [REDACTED]

From: Harach, Olivia OH
Sent: Friday, 27 June 2025 11:39 am
To: info@waikatoregion.govt.nz
Cc: Coffey, Wayne WC <[REDACTED]
Subject: Invitation to Waikato Regional Council to meet or provide written feedback – Taharoa Ironsands Limited Fast-track Applications [MERWNZ-MERWLIB.FID900086]

Good afternoon

Please see the **attached** letter in relation to applications that TIL is preparing for the Central and Southern Block Project and Northern Block Project under the Fast-track Approvals Act 2024.

The purpose of the letter is to offer WRC the opportunity to discuss the applications with TIL. Can you please ensure that this letter is forwarded to **AnaMaria d'Aubert**. We have received a bounce back email from AnaMaria's email address.

Please let me know if you have any queries.

Regards
Wayne



Taharoa Ironsands Ltd

24 June 2025

BY EMAIL: [REDACTED]

Waikato Regional Council
Private Bag 3038
Waikato Mail Centre
Hamilton 3240

Dear AnaMaria

Taharoa Ironsands Limited – resource consent and approvals application

1. Taharoa Ironsands Limited (**TIL**) owns and operates the Taharoa Ironsand Mine.
2. As you know, in 2020 TIL applied to Waikato Regional Council (**WRC**) for the necessary resource consents under the Resource Management Act 1991 (**RMA**) to continue its existing mining operation on the Central and Southern Blocks of Taharoa C. TIL appealed the decision made by Independent Commissioners appointed by WRC to the Environment Court and that appeal remains on hold while TIL is preparing an application for the necessary consents to be obtained under the Fast-track Approvals Act 2024 (**FTAA**) approvals process instead.
3. TIL's consenting project for the Central and Southern Blocks of the Mine has been recognised by the Government as a regionally and nationally significant project and has been directly referred to utilise the Fast-Track approval process. TIL is also seeking to expand the Mine into the Northern Block and this project has also been directly referred by the Government to utilise the Fast-track process on account of its regional and national significance.
4. We are now preparing our substantive applications for both projects. We are intending to file the applications with the Environmental Protection Agency in June/July 2025. Enviser is managing the preparation of the applications on behalf of TIL with input from a range of technical consultants, including Grant Eccles (planner) of Tonkin & Taylor Limited. Tonkin & Taylor has provided a high-level summary of what will be sought in each application in **Appendix A**.
5. TIL has a good understanding of the Council's view in respect of the consenting of the Central and Southern Blocks from the consenting process under the RMA. We also understand that the Council is open to further discussing proposed conditions of consent in respect of the Central and Southern Blocks following TIL's appeal to the Environment Court. We consider that this would be worthwhile. We are therefore writing to request a discussion about conditions and any other feedback that the Council has in respect of both projects, while the FTAA applications are being prepared.
6. We are writing to provide you with an opportunity to discuss the applications while they are being prepared. If you would like to meet with TIL's team, please let us know using the following email address [REDACTED]

7. If you would prefer to provide written feedback, please let us know.

Yours faithfully

Wayne Coffey
Managing Director and CEO of Taharoa Ironsands Limited

Copy to:

Anna McConachy, Gordon & Pilditch

Appendix A

Taharoa Ironsands Mine – Project summary for pre-application consultation

- **Northern Block Mining Project**
- **Central and Southern Block Mining Project**

1 Overview

Taharoa Ironsands Limited (TIL) operate an iron sand mine at Taharoa, on the West Coast of the North Island, approximately 8 km south of Kawhia Harbour. The Taharoa Mine has been in operation since 1973 (owned by New Zealand Steel until 2017). The mine site covers an area of approximately 1,300 hectares, primarily on Māori land legally described as the Taharoa C Block and the part of the coastal marine area (CMA) legally defined as Port Taharoa (**mine**).

For the purposes of mining activity, Taharoa C Block is divided into blocks. As shown on the attached plan:

- (a) the area of the site to the north of the Mitiwai Stream is known as the Northern Block.
- (b) the area of the site between the Mitiwai Stream and the Wainui Stream is known as the Central Block; and
- (c) the area of the site to the south of the Wainui Stream is known as the Southern Block.

The Central and Southern Blocks are currently operated under a suite of resource consents granted in 2006.¹ Mining activity has not historically occurred in the Northern Block.

TIL is now preparing applications for the necessary resource consents, wildlife permits and archaeological authorities under the Fast-track Approvals Act 2024 (FTAA) to authorise:

- the extraction of sand (and associated activities) on the Northern Block (known as the Northern Block Mining Project); and
- the continuation of sand extraction (and associated activities which support the entire mine, including its export operation) on the Central and Southern Blocks and in the CMA (known as the Central and Southern Block Mining Project).

The following describes the proposed mining and associated works which are subject to the applications, details the resource consents and approvals sought and provides a high-level summary of the potential effects on the environment of each project at this stage. As the applications are currently being prepared, this information is based on the work completed as of 01 May 2025, and is subject to change.

¹ TIL also hold separate resource consents for mining of (i) the “Eastern Block” granted in 2018 (mining now completed and rehabilitation underway), and (ii) the “Te Mania Extension” adjoining the Eastern Block granted in 2022 (mining yet to commence), and (iii) a small area in the Northern Block known as “Pit 1” granted in late 2024 (mining currently in progress). Mining at these locations relies on the water take resource consents and the coastal permits granted for the Central and Southern Blocks.

2 Description of proposed works

TIL propose to mine ironsand throughout the Northern, Central and Southern Blocks excluding areas where mining restrictions will apply. The areas where mining activity will not take place are within 100 m of Mean High Water Springs, 30 m of perennial water bodies (Mitiwai Stream, Wainui Stream and Lake Taharoa), and within already identified urupa and archaeological re-interment areas on the mine. Other mining exclusion areas may be identified as part of the completion of technical assessments that are currently underway. Any additional mining exclusion areas that are identified by the technical assessments will be included in the substantive FTAA applications.

Whilst the process to extract, process and export the ironsand can and does vary depending on the nature of the deposit being mined at the time, it follows the same broad steps. These activities, which are sought to be authorised as part of the Central and Southern Block Project, include:

1. **Vegetation, topsoil and overburden removal, including harvesting of trees with commercial value (pines).** Useful native species are removed prior to stripping of topsoil for use in the eco-sourced nursery on site. Topsoil is stockpiled on-site for use in future rehabilitation activities.
2. **Extraction and processing of Ironsand.** Raw Ironsand is extracted using various methods and equipment depending on ground conditions. In upper layers, standard earthmoving machinery such as excavators, bulldozers, and trucks are used to collect the ironsand and deposit it into a Dry Mining Unit (DMU). The DMU mixes the ironsand with water to form a slurry, which is then pumped to a treatment plant for titanomagnetite extraction.
3. During this process, groundwater and surface water may enter the active excavation area. To maintain dry working conditions, this water may be pumped out as required. However, as mining progresses to deeper layers, maintaining a dry pit may become impractical. In such cases, a cutter-suction dredge is used in a water-filled pond. The dredge floats on the water and uses a submerged dredge head to cut, fluidise, and pump the Ironsand slurry through a pipeline to the treatment plant. The dredge is capable of operating at depths of 8 to 15 meters below the pond surface. In some instances, a long-reach excavator may also be used to extract material from within the pond.
4. **Processing.** The extracted ironsand is transported to a centralised processing plant where it is concentrated and processed. The ironsand is refined using screening and gravity separation. The ironsand is mixed into a slurry and pumped through a seabed pipeline to a bulk carrier ship moored at the Port of Taharoa. The export pipelines run from the processing and storage facility located on land to a Single Buoy Mooring (SBM), located approximately 3.5 km offshore.
5. **Ship loading and dewatering.** Bulk carrier ships moor at the SBM to receive the ironsand in slurry form from the export pipelines. Each ship contains dewatering equipment and the resulting freshwater, containing residual fine suspended material (inert, inorganic geological material) that is removed from the ironsand slurry, is discharged from the ship to the sea. The discharge forms a buoyant plume that floats on the seawater surface before dispersal and dilution. Ship loading operations are currently undertaken approximately 20 times per year and will increase in frequency in future as production increases up to a projected maximum of 35 times per year. Each ship loading activity takes approximately 90 hours (of pumping time) however weather conditions have an influence on loading timeframes.

6. **Tailings disposal and rehabilitation of mined areas.** The tailings (ferrous and non-ferrous sand, silts and clays) which are separated from the exportable product are pumped as a slurry to tailings disposal areas. The discharged slurry dewateres by gravity, with the drainage water collected and directed into a settlement pond or ponds. Once the tailings have dewatered, mechanical plant (excavators and dozers) redistribute the material to form the grade and levels required by the rehabilitation plan for that area. Following this the land may be stabilised, top soiled and replanted.

To operate the mine, the process requires the abstraction of water from the Wainui Stream via a constructed dam incorporating a fish pass, and the discharge of stormwater to the Wainui Stream and the discharge of process water to settling ponds. Excess stormwater and process water is discharged to the CMA via the ship loading pipelines.

The activities sought to be authorised as part of the Northern Block Mining Project include (but are not limited to):

- (a) vegetation, topsoil and overburden removal, and excavation and processing of iron sand above and below the water table (as above);
- (b) the transportation of that product via temporary pipelines to the established processing plant on the Central and Southern Block;
- (c) processing (as above);
- (d) discharge of process water to land; and
- (e) tailing disposal and rehabilitation of mined areas (as above).

The Northern Block Mining Project will rely on / be supported by the processing infrastructure located on the Central and Southern Blocks. It will also rely on / be supported by the consents being sought for the Central and Southern Block to take and use water from the Wainui Stream, discharge of stormwater to the Wainui Stream and the CMA, discharge of process water to the CMA and transport of processed product from the processing facility through the ship-loading pipelines to the CMA. No changes are being proposed to the existing water take limits and discharge limits to facilitate mining of the Northern Block.

3 Approvals sought

3.1 Resource Management Act 1991

A summary of the resource consents that are required for the Northern, Central and Southern Blocks is set out below.

3.1.1 Resource consents required for the Northern Block

National Environmental Standard for Freshwater 2020 – consents to clear vegetation and undertake earthworks within and within 10m of a natural inland wetland. Consents are also required to take, use, dam, or divert water within and within 100 m of a natural inland wetland and to discharge water within and within 100 m of a natural inland wetland.

National Environmental Standard for Commercial Forestry 2017 – consent to harvest pine trees within Class 8e land.

Operative Waikato Regional Plan – consents for soil disturbance and vegetation clearance activities, diversion and taking of groundwater and surface of water associated with mining above and below the water table, discharge of a contaminant to land or water (process water and placement of tailings) and for overburden disposal to land.

Additionally, resource consent is required under the Operative Waitomo District Plan for the potential disturbance of archaeological sites recorded in the Plan - this consent applies to the Northern Block only given that mining has occurred since the early 1970's on the Central and Southern Blocks.

3.1.2 Resource consents required for the Central and Southern Blocks

The resource consents set out above are also required for the Central and Southern Blocks.² In addition, the following resource consents are required for the Central and Southern Blocks Project:

Operative Waikato Regional Plan – consents for the damming, diversion and taking of surface water and groundwater, for stream bed disturbance, and for the discharge of stormwater to surface water.

Operative and Proposed Waikato Regional Coastal Plans – consents for the use and occupation of the Coastal Marine Area by the export pipelines and the SBM, for discharges to and depositions in the CMA from shiploading activities, and for the discharge of stormwater from the export pipelines.

3.2 Wildlife Act 1953

A wildlife permit will be required to manage lizards if they are identified prior to vegetation removal or ground disturbance works.

3.3 Heritage New Zealand Pouhere Taonga Act 2014

Archaeological authorities will be sought due to the potential for currently undiscovered archaeological features to be disturbed by mining activities (excluding urupa and archaeological areas reserved from mining which will not be disturbed).

4 Benefits of the Projects

The continuation of the mining activity on the Taharoa C Block that will be facilitated by the approvals sought under the FTAA will generate significant regional and national benefits. The Central and Southern Block Mining Project and Northern Block Project will directly contribute billions to the New Zealand economy (through employment, income for landowners, business for regional supplies and the payment of taxes).

The mine provides significant employment opportunities for the community, particularly local Māori. Over 82% of income earned by local Ngāti Mahuta comes from employment at the mine. TIL has a core workforce of 170-80 people but employs upwards of 300 staff and contractors.

TIL relies on locally sourced goods and services including the supply of electricity and services from surrounding areas including Kawhia, Te Kuiti, Otorohanga, Te Awamutu and Hamilton. TIL also relies on specialist sub-contractor support including the maintenance and management of specialised mine machinery and equipment. The support TIL relies on (and will continue to rely on) from

² Excluding the resource consent required for archaeological site disturbance.

surrounding centres for the Northern Block Project and Central and Southern Block Mining Project will inject billions into the local economy over the life of the consents sought for the Project.

The mine also provides essential benefits to the local Taharoa Village which was established around the mine and exists today because of the substantial financial contribution the mine makes every year.

5 Summary of potential adverse effects on the environment

The following high-level summary of effects on the environment is based on technical assessments previously completed in relation to mining of the Central and Southern blocks. These assessments are currently being updated, and additional assessments are being completed for mining of the Northern Block. A full assessment of effects supported by technical assessments will be included in the applications for the Northern and Central/Southern Blocks respectively.

5.1 Effects common to the Northern, Central and Southern Blocks

5.1.1 Effects on terrestrial ecology (including bats, birds, lizards)

Disturbance from mining activities has the potential to have adverse effects on wetland and grassland bird species. The loss of existing grassland due to the mining activity may also result in potential injury or death of various threatened native skink present in low numbers in the grassland. The overall level of effect on terrestrial ecology has been assessed as being **low** with the provision of an over-arching Environmental Management Plan (EMP), including an Avifauna Management Plan, Bat Management Plan and a Lizard Management Plan, and imposition of appropriate conditions such as a requirement for there to be a 30 m planting buffer around all natural water bodies. Subject to the imposition of conditions, the overall level of effects on terrestrial ecology has been assessed as **minor**.

5.1.2 Effects of mining below the water table

When mining activity interacts with groundwater there may be the potential for adverse effects on surface freshwater bodies if there is a hydraulic connection between the groundwater and surface water. This connection will be carefully monitored. Any adverse effects on the primary freshwater bodies on the site (the Mitiwai Stream and the Wainui Stream) can be avoided and mitigated through consent conditions including for example, requirements to maintain a minimum flow within the streams.

5.1.3 Effects of discharge to land

The discharge of tailings and surplus process water to land has the potential to cause adverse effects on landform, groundwater and nearby waterways. The tailings material is re-formed as close as practicable to the original landform. The discharge of surplus process water does not result in contamination of groundwater due to the natural filtering provided by the sandy ground conditions. Overall, the adverse effects of discharges to land have been assessed as **less than minor**.

5.1.4 Land disturbance effects

The mining operation is located in a high-risk erosion area and the mining and stockpiling of iron sand has the potential to result in adverse effects on land stability. Given that the mine has a good operational history with no erosion issues requiring mitigation, a rehabilitation process and

revegetation plan is followed for disturbed areas, and perennial waterbody mining setbacks are imposed, any adverse effects can be considered **negligible**.

5.1.5 Archaeological effects

Taharoa C Block is and has always been Māori land which means that there is elevated potential for accidental discovery of koi iwi and other taonga in the dune environment of the area. Ngāti Mahuta derived tikanga and protocols apply when discoveries of koiwi and taonga occur in the Taharoa dune environment as a result of mining activity, and that tikanga/protocol is reflected in existing and proposed consent conditions. Defined urupā are located within the dune system where accidentally discovered koiwi are interred with appropriate tikanga being observed. A buffer in which no mining occurs is observed around each urupā.

All of these measures and practices will continue and mitigate the potential adverse effects in relation to archaeology to **less than minor** levels.

5.1.6 Cultural effects

In considering cultural effects, it is important to note the cultural benefits the ongoing operation of the mine has for Ngati Mahuta as tangata whenua. These benefits include employment benefits, royalties, and support for the local community. Ngati Mahuta, though the Taharoa C Block Incorporation, own the land on which the mine operates and is paid significant royalties from the mine. The mine also supports the employment and growth of Ngati Mahuta whanau. The local employment opportunity generated by the mine has allowed the local community to retain members of the community who may have otherwise moved away to seek employment elsewhere and lost their connection to the land.

TIL understand the views of the respective Taharoa Marae and Te Runanga in relation to the potential cultural effects of the Central and Southern Block Project. In summary, at a high-level:

The damming of the Wainui Stream has the potential to have adverse effects on the health of Lake Taharoa and its indigenous fishery, an important matter to Ngāti Mahuta. The maintenance of the effectiveness of the fish pass at the dam in the Wainui Stream is important to ensure the presence of indigenous fish species in the stream and lake upstream of the dam continues.

The maintenance and monitoring of baseflow in the Mitiwai Stream is also an important matter from a cultural perspective. TIL has engaged expert consultants to monitor the stream to ensure that TIL understands the potential effects of its mining activity on the Stream, which will be managed through consent conditions. Rehabilitation of the mine site to a sustainable landform and land cover is also an important matter to Ngāti Mahuta. Representatives of Ngāti Mahuta have shared their desire for the land to be returned to its natural state following mining activity (being rolling sand dunes with some pockets of vegetation). In that regard, TIL has developed and is implementing an overall Site Rehabilitation Plan and updated Conceptual Site Closure Plan in place to be implemented in the event that the mine closes in the future.

TIL propose to consult with the respective Taharoa Marae and Te Runanga in the preparation of the various management plans that govern the management of effects at the mine. Such consultation and engagement benefits both parties – TIL will gain the benefit of access to the skills and expertise that reside within the marae and hapu whanau, while marae and hapu whanau will have the opportunity to influence the content of management plans that will play an important part in managing the ongoing effects of the mining activity. TIL will also propose the provision of a website

which includes monthly monitoring records to communicate data to mana whenua and the community.

5.1.7 Air Quality Effects

The mine is located in an isolated location subject to extreme westerly winds. In this environment, there is potential for wind-blown sand from the mine site to generate adverse effects on adjoining and adjacent sites to the mine, including in Taharoa Village. TIL implement a range of avoidance and mitigation techniques to control such emissions including the erection of fencing to trap sand particles, placing ground cover (for example, coconut matting) on exposed areas, using mobile and automated fixed watering systems on internal site roads, enforcing vehicle speed limits, and progressively rehabilitating mined out areas. These measures mean that the mine site can operate in accordance with the relevant permitted activity rule of the Waikato Regional Plan with regards to air quality. TIL proposes to implement a Dust Management Plan to manage the implementation of these dust prevention mechanisms. Although there remains the potential for off-site discharges of dust due to the coastal environment, these discharges are highly unlikely to result in adverse effects to human health. Acoustic Effects

The mining activities have the potential to have adverse noise effects on key sensitive receptors on sites adjoining the Northern Block (1891 Taharoa Road, 1891A Taharoa Road, Te Kōraha Marae and 25 Rotopuhoe Road). However, these receptors are located several hundred metres from where mining will occur on the Northern Block and given this separation distance, it is expected that the works will be able to be managed to comply with the Waitomo District Plan daytime and nighttime noise limits. As a result, any potential adverse effects from noise from mining on the Northern Block on sensitive receivers is expected to be **less than minor**.

Mining on the Central and Southern Blocks has been continuous since the 1970s and benefits from existing use rights with respect to noise levels and associated acoustic effects. Notwithstanding this, noise levels are expected to be compliant with District Plan noise limits. TIL will continue to adopt the best practicable option to ensure that the emission of noise from these blocks does not exceed a reasonable level for any nearby sensitive receptors.

5.2 Effects relating to the Central and Southern Blocks only

5.2.1 Effects of damming Wainui Stream

Authorisation of the dam in the Wainui Stream will result in a similar water regime to what is currently present. Fish passage will be provided for via the monitoring and maintenance of a fish pass which achieves the intended purpose of allowing grey mullet and other targeted species to be able to navigate upstream to Lake Taharoa. The downstream migration of juvenile native fish can be adequately addressed through consent conditions which include the retention of a minimum flow within the fish pass and downstream of the dam, as well as monitoring of fish pass performance. As a result, the effects of the dam on fish passage has been assessed as **negligible**.

5.2.2 Effects on water quantity

Water is extracted from the impounded section of the Wainui Stream for mining and shiploading processes. Separate water take consents are held for the mining and shiploading takes and the consents cannot be exercised at the same time. The mine is currently operating within the historically consented limits for water abstraction and no further water quantity is required for the continued operation of the mine. The Wainui Stream catchment is not over-allocated and there are

no permits held by any other party to take water from the stream. As a result, adverse water quantity effects are avoided.

5.2.3 Effects of water take on marginal wetlands

The proposed water takes have the potential to have adverse effects on marginal wetlands around the edges of Lake Taharoa. Noting that the wetlands have acclimated to the lake levels that have been experienced since the installation of the dam in the Wainui Stream in the early 1970's, the magnitude of these effects has been assessed as **low** given that the water takes will be operated in a similar manner to what has been historically occurred at the mine. Importantly, TIL is proposing to retain existing conditions that require water takes to cease if the lake levels reach a certain minimum point. Conditions will also be proposed that require ongoing monitoring of the lake margin wetlands and management responses to be implemented if the lake level remains low for an extended period and the wetlands show signs of stress (other than that caused by natural seasonal conditions).

5.2.4 Effects on benthic fauna

The proposed ship-loading infrastructure including pipelines on the seabed and the tethering mechanism for the SBM will continue to occupy part of the seabed and impact on a small amount of available subtidal sandflat habitat. Given the small percentage of the available subtidal sandflat habitat this represents, this is assessed as having a low magnitude of effect on benthic ecology. The effects of constructing the pipeline have also been assessed as being **low**.

5.2.5 Effects on fish and seafood species

The discharge from the ship loading process has the potential to have adverse effects on existing habitat for fish and seafood species. Given the relatively infrequent and short-term nature of the discharge and the highly mobile nature of fish species the potential adverse effects are assessed as **negligible**. The presence of green lipped mussels in the area of the discharge indicates that ongoing ship loading discharges do not inhibit mussel colonisation and has a **negligible** effect on seafood resource species.

5.2.6 Effects on marine mammals

A number of marine mammal species can be present in the wider marine area around Port Taharoa such as Māui dolphins, common dolphins, southern right whales and Orca/killer whales. Given the low level of risk posed by the ship loading operation and the fact that it has been occurring in the vicinity since the early 1970's, the overall risk of adverse effects for marine mammals is assessed as **negligible**. Nevertheless, to recognise the sensitivity of the marine mammals that traverse the area, TIL propose conditions that require an underwater noise survey to be undertaken if 35 ship visits occur in a 12 month period, in order to inform best practice underwater noise measures.

5.2.7 Effects on coastal processes

TIL seeks to continue the ability to discharge up to 75,000m³ per day of ship loading water, including freshwater and fine sediment, up to a maximum of 7,500,000m³ per year. As a result of dilution and dispersion of the sediment plume provided by oceanic conditions, the effect of this discharge on coastal processes has been assessed as being **less than minor**.

5.2.8 Effects of discharges in the Coastal Marine Area (CMA)

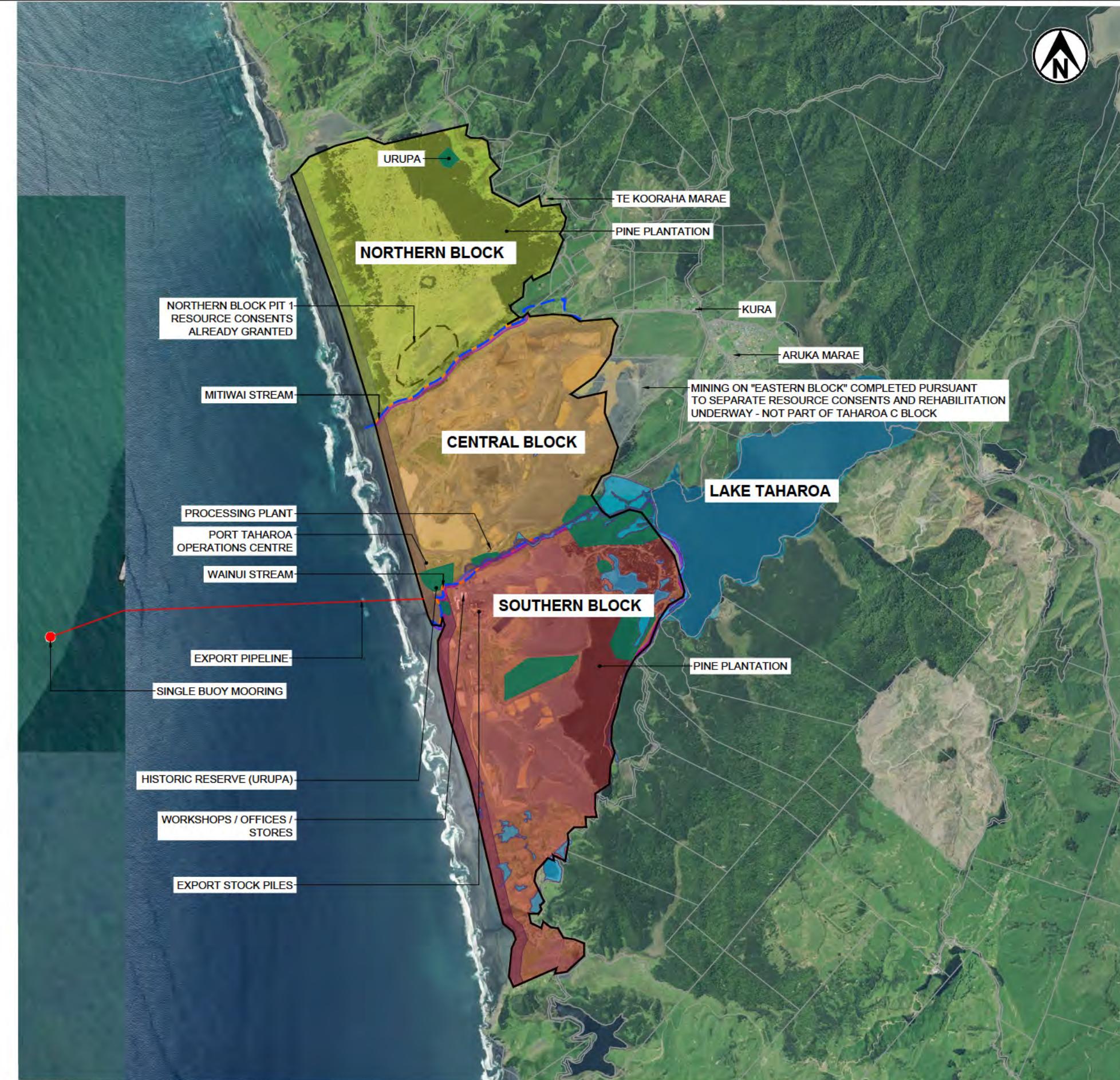
The potential adverse effects of the sediment discharge from the ship-loading events have been addressed above. The discharge includes some trace levels of naturally occurring contaminants in the ironsand that is pumped in slurry form into the ship. Because of the extremely low levels of the naturally occurring contaminants, and the dilution provided by the sea water, the discharge will not result in any measurable toxicity effect on benthic fauna.

TIL is seeking consent to continue to discharge excess process water and stormwater to the CMA at a rate of 32,000m³/day. This discharge occurs infrequently and when there is no suitable alternative to provide for the discharge on land - primarily at times of prolonged heavy rainfall. The potential ecological effects from the process water/stormwater discharge are likely to be even less than those of the ship loading discharge which were assessed to be less than minor. Correspondingly, no further actions to avoid, remedy or mitigate potential effects from the process wastewater and stormwater discharges are required apart from monitoring of the discharge quality and composition.

5.2.9 Effects on navigation safety

The continued ship movements to and from the Port of Taharoa and the occupation of the CMA by ship loading infrastructure have the potential to have adverse effects on navigational safety of other users of the CMA. However, the use of this area for recreational watercraft and commercial vessels is infrequent and the movement of ironsand export ships has been established in the area since the early 1970's. No more than one ship can access the mooring buoy at one time. Furthermore, the Port of Taharoa is operated in compliance with the New Zealand Port and Harbour Marine Safety Code, the Harbourmaster previously had no objection to the continued activity and several improvements have been implemented since the granting of the now expired resource consents in 2002. For these reasons, potential adverse effects on navigation safety have been assessed as **less than minor**.

LEGEND	
	STREAM
	PROPERTY BOUNDARIES
	MINING LICENCE AREA (TAHAROA C BLOCK)
	NORTHERN BLOCK
	CENTRAL BLOCK
	SOUTHERN BLOCK
	30m PERENNIAL WATER BODY / STREAM SETBACK
	100m MHWS SETBACK SUBJECT TO SURVEY
	ARCHEOLOGICAL AREAS RESERVED FROM MINING
	WETLAND



Subject: Confirmed - Fast-track consultation meeting with WRC
Location: Waikato Regional Council (Hamilton Office) (160 Ward St, Hamilton WKO 3204)

Start: Thu 17/07/2025 3:30 pm
End: Thu 17/07/2025 5:30 pm

Recurrence: (none)

Meeting Status: Meeting organizer

Organizer: Stephanie de Groot
Required Attendees: Jared Pettersson; Grant Eccles; Coffey, Wayne WC

Attendees for WRC: Sheryl Roa, AnaMaria d'Aubert and Anna McConachy

Subject: TIL - Fast Track
Location: Microsoft Teams Meeting; MTG Kahawai (13) Lv3

Start: Fri 31/10/2025 11:30 am
End: Fri 31/10/2025 1:30 pm

Recurrence: (none)

Meeting Status: Accepted

Organizer: Sheryl Roa

Meeting invite for next week to get it into your calendars.

Thanks
Sheryl

Microsoft Teams [Need help?](#)

[Join the meeting now](#)

Meeting ID: [REDACTED]

Passcode: [REDACTED]

Dial in by phone

[+64 4 280 7338,,450983176#](#) New Zealand, Wellington

[Find a local number](#)

Phone conference ID: [REDACTED]

For organizers: [Meeting options](#) | [Reset dial-in PIN](#)



This email message and any attached files may contain confidential information, and may be subject to legal professional privilege. If you have received this message in error, please notify us immediately and destroy the original message. Any views expressed in this message are those of the individual sender and may not necessarily reflect the views of Waikato Regional Council. Waikato Regional Council makes reasonable efforts to ensure that its email has been scanned and is free of viruses, however can make no warranty that this email or any attachments to it are free from viruses.

From: Grant Eccles <[REDACTED]>
Sent: Monday, 26 May 2025 2:26 pm
To: [REDACTED]
Subject: Taharoa Ironsands Ltd - Applications under the Fast Track Approvals Act 2024
Attachments: Consultation letter to Ngāti Maniapoto dated 21 May 2025.pdf

Tēnei te mihi ki a koutou

Please see attached letter regarding applications by Taharoa Ironsands Ltd (“TIL”) under the Fast Track Approvals Act 2024.

If you have any written feedback, or would value a hui with TIL to further discuss the applications, please feel free to respond to me directly at this email address.

Ngaa Mihi

Grant Eccles | Technical Director - Planning

BREP, MNZPI

Tonkin + Taylor

Level 5, 711 Victoria Street, Hamilton 3204 | PO Box 9544, Hamilton, New Zealand

[REDACTED] www.tonkintaylor.co.nz  [T+T profile](#)

 **Tonkin + Taylor** | 

To send me large files you can use my [file drop](#)



Taharoa Ironsands Ltd

21 May 2025

BY EMAIL: [REDACTED]

Te Nehenehenui on behalf of Ngāti Maniapoto
C-/Tramaine Murray
Settlement Protection, Rights & Interests Manager
[REDACTED] Taupiri Street
Te Kūiti 3910

Dear Tramaine

Taharoa Ironsands Limited – Fast-track Approvals Act 2024 applications

1. Taharoa Ironsands Limited (**TIL**) owns and operates the Taharoa Ironsand Mine which has been in operation since 1973.
2. You may be aware that the Mine is divided into blocks known as the Northern, Central and Southern Block which are all located on Taharoa C Block, as well as the Eastern Blocks and the Te Mania Extension which are located on adjoining land.
3. TIL needs to replace its resource consents relating to the Central and Southern Blocks to continue operating the existing Mine and to enable expansion of the Mine in the future. TIL sought to do so by making an application in 2020 under the standard resource consenting process under the Resource Management Act 1991. The consenting process was lengthy and TIL was not satisfied with the decision, which led it to appeal the decision to the Environment Court on 12 December 2024.
4. Since the appeal was filed, the Fast-track Approvals Act 2024 (**FTAA**) has been enacted. The FTAA establishes a fast-track approvals regime for projects of national and regional significance in New Zealand.
5. TIL's consenting project for the Central and Southern Blocks of the Mine has been recognised by the Government as having regional and national significance having regional and national significance and has been directly referred to utilise the Fast-Track approval process. The FTAA therefore provides an alternative, and suitable, consenting pathway for the Central and Southern Blocks. TIL is also proposing to expand its existing operation into the Northern Block. New mining of this Block has also been directly referred by the Government to utilise the Fast-track process on account of its regional and national significance.
6. We are now preparing our substantive applications for both projects which will be considered under the FTAA. We are intending to file both applications with the Environmental Protection Agency in June/July 2025. Enviser is managing the preparation of the applications on behalf of TIL with input from a range of technical consultants, including Grant Eccles (planner) of Tonkin & Taylor Limited. Tonkin & Taylor has provided a high-level summary of what will be sought in each application in **Appendix A**.
7. We are writing to provide you with an opportunity to discuss the applications while they are being prepared or otherwise provide written feedback (if you do not wish to meet). We also recognise you have sought recognition of your customary interests under the Marine and Coastal Area (Takutai Moana) Act 2011 (MAC-01-4-002).
8. We are looking to arrange initial meetings to discuss the applications as soon as possible. Otherwise, we would appreciate that any written feedback is provided by 10 June 2025.

9. If you would like to discuss the applications with us, can you please let us know using the following email address: [REDACTED]

Yours faithfully



Wayne Coffey
Managing Director and CEO of Taharoa Ironsands Limited

Copy to:

John Kaati, Maniapoto Trust Board [REDACTED]

Nga Tini Hapu o Maniapoto [REDACTED]

Appendix A

Taharoa Ironsands Mine – Project summary for pre-application consultation

- **Northern Block Mining Project**
- **Central and Southern Block Mining Project**

1 Overview

Taharoa Ironsands Limited (TIL) operate an iron sand mine at Taharoa, on the West Coast of the North Island, approximately 8 km south of Kawhia Harbour. The Taharoa Mine has been in operation since 1973 (owned by New Zealand Steel until 2017). The mine site covers an area of approximately 1,300 hectares, primarily on Māori land legally described as the Taharoa C Block and the part of the coastal marine area (CMA) legally defined as Port Taharoa (**mine**).

For the purposes of mining activity, Taharoa C Block is divided into blocks. As shown on the attached plan:

- (a) the area of the site to the north of the Mitiwai Stream is known as the Northern Block.
- (b) the area of the site between the Mitiwai Stream and the Wainui Stream is known as the Central Block; and
- (c) the area of the site to the south of the Wainui Stream is known as the Southern Block.

The Central and Southern Blocks are currently operated under a suite of resource consents granted in 2006.¹ Mining activity has not historically occurred in the Northern Block.

TIL is now preparing applications for the necessary resource consents, wildlife permits and archaeological authorities under the Fast-track Approvals Act 2024 (FTAA) to authorise:

- the extraction of sand (and associated activities) on the Northern Block (known as the Northern Block Mining Project); and
- the continuation of sand extraction (and associated activities which support the entire mine, including its export operation) on the Central and Southern Blocks and in the CMA (known as the Central and Southern Block Mining Project).

The following describes the proposed mining and associated works which are subject to the applications, details the resource consents and approvals sought and provides a high-level summary of the potential effects on the environment of each project at this stage. As the applications are currently being prepared, this information is based on the work completed as of 01 May 2025, and is subject to change.

¹ TIL also hold separate resource consents for mining of (i) the “Eastern Block” granted in 2018 (mining now completed and rehabilitation underway), and (ii) the “Te Mania Extension” adjoining the Eastern Block granted in 2022 (mining yet to commence), and (iii) a small area in the Northern Block known as “Pit 1” granted in late 2024 (mining currently in progress). Mining at these locations relies on the water take resource consents and the coastal permits granted for the Central and Southern Blocks.

2 Description of proposed works

TIL propose to mine ironsand throughout the Northern, Central and Southern Blocks excluding areas where mining restrictions will apply. The areas where mining activity will not take place are within 100 m of Mean High Water Springs, 30 m of perennial water bodies (Mitiwai Stream, Wainui Stream and Lake Taharoa), and within already identified urupa and archaeological re-interment areas on the mine. Other mining exclusion areas may be identified as part of the completion of technical assessments that are currently underway. Any additional mining exclusion areas that are identified by the technical assessments will be included in the substantive FTAA applications.

Whilst the process to extract, process and export the ironsand can and does vary depending on the nature of the deposit being mined at the time, it follows the same broad steps. These activities, which are sought to be authorised as part of the Central and Southern Block Project, include:

1. **Vegetation, topsoil and overburden removal, including harvesting of trees with commercial value (pines).** Useful native species are removed prior to stripping of topsoil for use in the eco-sourced nursery on site. Topsoil is stockpiled on-site for use in future rehabilitation activities.
2. **Extraction and processing of Ironsand.** Raw Ironsand is extracted using various methods and equipment depending on ground conditions. In upper layers, standard earthmoving machinery such as excavators, bulldozers, and trucks are used to collect the ironsand and deposit it into a Dry Mining Unit (DMU). The DMU mixes the ironsand with water to form a slurry, which is then pumped to a treatment plant for titanomagnetite extraction.
3. During this process, groundwater and surface water may enter the active excavation area. To maintain dry working conditions, this water may be pumped out as required. However, as mining progresses to deeper layers, maintaining a dry pit may become impractical. In such cases, a cutter-suction dredge is used in a water-filled pond. The dredge floats on the water and uses a submerged dredge head to cut, fluidise, and pump the Ironsand slurry through a pipeline to the treatment plant. The dredge is capable of operating at depths of 8 to 15 meters below the pond surface. In some instances, a long-reach excavator may also be used to extract material from within the pond.
4. **Processing.** The extracted ironsand is transported to a centralised processing plant where it is concentrated and processed. The ironsand is refined using screening and gravity separation. The ironsand is mixed into a slurry and pumped through a seabed pipeline to a bulk carrier ship moored at the Port of Taharoa. The export pipelines run from the processing and storage facility located on land to a Single Buoy Mooring (SBM), located approximately 3.5 km offshore.
5. **Ship loading and dewatering.** Bulk carrier ships moor at the SBM to receive the ironsand in slurry form from the export pipelines. Each ship contains dewatering equipment and the resulting freshwater, containing residual fine suspended material (inert, inorganic geological material) that is removed from the ironsand slurry, is discharged from the ship to the sea. The discharge forms a buoyant plume that floats on the seawater surface before dispersal and dilution. Ship loading operations are currently undertaken approximately 20 times per year and will increase in frequency in future as production increases up to a projected maximum of 35 times per year. Each ship loading activity takes approximately 90 hours (of pumping time) however weather conditions have an influence on loading timeframes.

6. **Tailings disposal and rehabilitation of mined areas.** The tailings (ferrous and non-ferrous sand, silts and clays) which are separated from the exportable product are pumped as a slurry to tailings disposal areas. The discharged slurry dewateres by gravity, with the drainage water collected and directed into a settlement pond or ponds. Once the tailings have dewatered, mechanical plant (excavators and dozers) redistribute the material to form the grade and levels required by the rehabilitation plan for that area. Following this the land may be stabilised, top soiled and replanted.

To operate the mine, the process requires the abstraction of water from the Wainui Stream via a constructed dam incorporating a fish pass, and the discharge of stormwater to the Wainui Stream and the discharge of process water to settling ponds. Excess stormwater and process water is discharged to the CMA via the ship loading pipelines.

The activities sought to be authorised as part of the Northern Block Mining Project include (but are not limited to):

- (a) vegetation, topsoil and overburden removal, and excavation and processing of iron sand above and below the water table (as above);
- (b) the transportation of that product via temporary pipelines to the established processing plant on the Central and Southern Block;
- (c) processing (as above);
- (d) discharge of process water to land; and
- (e) tailing disposal and rehabilitation of mined areas (as above).

The Northern Block Mining Project will rely on / be supported by the processing infrastructure located on the Central and Southern Blocks. It will also rely on / be supported by the consents being sought for the Central and Southern Block to take and use water from the Wainui Stream, discharge of stormwater to the Wainui Stream and the CMA, discharge of process water to the CMA and transport of processed product from the processing facility through the ship-loading pipelines to the CMA. No changes are being proposed to the existing water take limits and discharge limits to facilitate mining of the Northern Block.

3 Approvals sought

3.1 Resource Management Act 1991

A summary of the resource consents that are required for the Northern, Central and Southern Blocks is set out below.

3.1.1 Resource consents required for the Northern Block

National Environmental Standard for Freshwater 2020 – consents to clear vegetation and undertake earthworks within and within 10m of a natural inland wetland. Consents are also required to take, use, dam, or divert water within and within 100 m of a natural inland wetland and to discharge water within and within 100 m of a natural inland wetland.

National Environmental Standard for Commercial Forestry 2017 – consent to harvest pine trees within Class 8e land.

Operative Waikato Regional Plan – consents for soil disturbance and vegetation clearance activities, diversion and taking of groundwater and surface of water associated with mining above and below the water table, discharge of a contaminant to land or water (process water and placement of tailings) and for overburden disposal to land.

Additionally, resource consent is required under the Operative Waitomo District Plan for the potential disturbance of archaeological sites recorded in the Plan - this consent applies to the Northern Block only given that mining has occurred since the early 1970's on the Central and Southern Blocks.

3.1.2 Resource consents required for the Central and Southern Blocks

The resource consents set out above are also required for the Central and Southern Blocks.² In addition, the following resource consents are required for the Central and Southern Blocks Project:

Operative Waikato Regional Plan – consents for the damming, diversion and taking of surface water and groundwater, for stream bed disturbance, and for the discharge of stormwater to surface water.

Operative and Proposed Waikato Regional Coastal Plans – consents for the use and occupation of the Coastal Marine Area by the export pipelines and the SBM, for discharges to and depositions in the CMA from shiploading activities, and for the discharge of stormwater from the export pipelines.

3.2 Wildlife Act 1953

A wildlife permit will be required to manage lizards if they are identified prior to vegetation removal or ground disturbance works.

3.3 Heritage New Zealand Pouhere Taonga Act 2014

Archaeological authorities will be sought due to the potential for currently undiscovered archaeological features to be disturbed by mining activities (excluding urupa and archaeological areas reserved from mining which will not be disturbed).

4 Benefits of the Projects

The continuation of the mining activity on the Taharoa C Block that will be facilitated by the approvals sought under the FTAA will generate significant regional and national benefits. The Central and Southern Block Mining Project and Northern Block Project will directly contribute billions to the New Zealand economy (through employment, income for landowners, business for regional supplies and the payment of taxes).

The mine provides significant employment opportunities for the community, particularly local Māori. Over 82% of income earned by local Ngāti Mahuta comes from employment at the mine. TIL has a core workforce of 170-80 people but employs upwards of 300 staff and contractors.

TIL relies on locally sourced goods and services including the supply of electricity and services from surrounding areas including Kawhia, Te Kuiti, Otorohanga, Te Awamutu and Hamilton. TIL also relies on specialist sub-contractor support including the maintenance and management of specialised mine machinery and equipment. The support TIL relies on (and will continue to rely on) from

² Excluding the resource consent required for archaeological site disturbance.

surrounding centres for the Northern Block Project and Central and Southern Block Mining Project will inject billions into the local economy over the life of the consents sought for the Project.

The mine also provides essential benefits to the local Taharoa Village which was established around the mine and exists today because of the substantial financial contribution the mine makes every year.

5 Summary of potential adverse effects on the environment

The following high-level summary of effects on the environment is based on technical assessments previously completed in relation to mining of the Central and Southern blocks. These assessments are currently being updated, and additional assessments are being completed for mining of the Northern Block. A full assessment of effects supported by technical assessments will be included in the applications for the Northern and Central/Southern Blocks respectively.

5.1 Effects common to the Northern, Central and Southern Blocks

5.1.1 Effects on terrestrial ecology (including bats, birds, lizards)

Disturbance from mining activities has the potential to have adverse effects on wetland and grassland bird species. The loss of existing grassland due to the mining activity may also result in potential injury or death of various threatened native skink present in low numbers in the grassland. The overall level of effect on terrestrial ecology has been assessed as being **low** with the provision of an over-arching Environmental Management Plan (EMP), including an Avifauna Management Plan, Bat Management Plan and a Lizard Management Plan, and imposition of appropriate conditions such as a requirement for there to be a 30 m planting buffer around all natural water bodies. Subject to the imposition of conditions, the overall level of effects on terrestrial ecology has been assessed as **minor**.

5.1.2 Effects of mining below the water table

When mining activity interacts with groundwater there may be the potential for adverse effects on surface freshwater bodies if there is a hydraulic connection between the groundwater and surface water. This connection will be carefully monitored. Any adverse effects on the primary freshwater bodies on the site (the Mitiwai Stream and the Wainui Stream) can be avoided and mitigated through consent conditions including for example, requirements to maintain a minimum flow within the streams.

5.1.3 Effects of discharge to land

The discharge of tailings and surplus process water to land has the potential to cause adverse effects on landform, groundwater and nearby waterways. The tailings material is re-formed as close as practicable to the original landform. The discharge of surplus process water does not result in contamination of groundwater due to the natural filtering provided by the sandy ground conditions. Overall, the adverse effects of discharges to land have been assessed as **less than minor**.

5.1.4 Land disturbance effects

The mining operation is located in a high-risk erosion area and the mining and stockpiling of iron sand has the potential to result in adverse effects on land stability. Given that the mine has a good operational history with no erosion issues requiring mitigation, a rehabilitation process and

revegetation plan is followed for disturbed areas, and perennial waterbody mining setbacks are imposed, any adverse effects can be considered **negligible**.

5.1.5 Archaeological effects

Taharoa C Block is and has always been Māori land which means that there is elevated potential for accidental discovery of koi iwi and other taonga in the dune environment of the area. Ngāti Mahuta derived tikanga and protocols apply when discoveries of koiwi and taonga occur in the Taharoa dune environment as a result of mining activity, and that tikanga/protocol is reflected in existing and proposed consent conditions. Defined urupā are located within the dune system where accidentally discovered koiwi are interred with appropriate tikanga being observed. A buffer in which no mining occurs is observed around each urupā.

All of these measures and practices will continue and mitigate the potential adverse effects in relation to archaeology to **less than minor** levels.

5.1.6 Cultural effects

In considering cultural effects, it is important to note the cultural benefits the ongoing operation of the mine has for Ngati Mahuta as tangata whenua. These benefits include employment benefits, royalties, and support for the local community. Ngati Mahuta, though the Taharoa C Block Incorporation, own the land on which the mine operates and is paid significant royalties from the mine. The mine also supports the employment and growth of Ngati Mahuta whanau. The local employment opportunity generated by the mine has allowed the local community to retain members of the community who may have otherwise moved away to seek employment elsewhere and lost their connection to the land.

TIL understand the views of the respective Taharoa Marae and Te Runanga in relation to the potential cultural effects of the Central and Southern Block Project. In summary, at a high-level:

The damming of the Wainui Stream has the potential to have adverse effects on the health of Lake Taharoa and its indigenous fishery, an important matter to Ngāti Mahuta. The maintenance of the effectiveness of the fish pass at the dam in the Wainui Stream is important to ensure the presence of indigenous fish species in the stream and lake upstream of the dam continues.

The maintenance and monitoring of baseflow in the Mitiwai Stream is also an important matter from a cultural perspective. TIL has engaged expert consultants to monitor the stream to ensure that TIL understands the potential effects of its mining activity on the Stream, which will be managed through consent conditions. Rehabilitation of the mine site to a sustainable landform and land cover is also an important matter to Ngāti Mahuta. Representatives of Ngāti Mahuta have shared their desire for the land to be returned to its natural state following mining activity (being rolling sand dunes with some pockets of vegetation). In that regard, TIL has developed and is implementing an overall Site Rehabilitation Plan and updated Conceptual Site Closure Plan in place to be implemented in the event that the mine closes in the future.

TIL propose to consult with the respective Taharoa Marae and Te Runanga in the preparation of the various management plans that govern the management of effects at the mine. Such consultation and engagement benefits both parties – TIL will gain the benefit of access to the skills and expertise that reside within the marae and hapu whanau, while marae and hapu whanau will have the opportunity to influence the content of management plans that will play an important part in managing the ongoing effects of the mining activity. TIL will also propose the provision of a website

which includes monthly monitoring records to communicate data to mana whenua and the community.

5.1.7 Air Quality Effects

The mine is located in an isolated location subject to extreme westerly winds. In this environment, there is potential for wind-blown sand from the mine site to generate adverse effects on adjoining and adjacent sites to the mine, including in Taharoa Village. TIL implement a range of avoidance and mitigation techniques to control such emissions including the erection of fencing to trap sand particles, placing ground cover (for example, coconut matting) on exposed areas, using mobile and automated fixed watering systems on internal site roads, enforcing vehicle speed limits, and progressively rehabilitating mined out areas. These measures mean that the mine site can operate in accordance with the relevant permitted activity rule of the Waikato Regional Plan with regards to air quality. TIL proposes to implement a Dust Management Plan to manage the implementation of these dust prevention mechanisms. Although there remains the potential for off-site discharges of dust due to the coastal environment, these discharges are highly unlikely to result in adverse effects to human health. Acoustic Effects

The mining activities have the potential to have adverse noise effects on key sensitive receptors on sites adjoining the Northern Block (1891 Taharoa Road, 1891A Taharoa Road, Te Kōraha Marae and 25 Rotopuhoe Road). However, these receptors are located several hundred metres from where mining will occur on the Northern Block and given this separation distance, it is expected that the works will be able to be managed to comply with the Waitomo District Plan daytime and nighttime noise limits. As a result, any potential adverse effects from noise from mining on the Northern Block on sensitive receivers is expected to be **less than minor**.

Mining on the Central and Southern Blocks has been continuous since the 1970s and benefits from existing use rights with respect to noise levels and associated acoustic effects. Notwithstanding this, noise levels are expected to be compliant with District Plan noise limits. TIL will continue to adopt the best practicable option to ensure that the emission of noise from these blocks does not exceed a reasonable level for any nearby sensitive receptors.

5.2 Effects relating to the Central and Southern Blocks only

5.2.1 Effects of damming Wainui Stream

Authorisation of the dam in the Wainui Stream will result in a similar water regime to what is currently present. Fish passage will be provided for via the monitoring and maintenance of a fish pass which achieves the intended purpose of allowing grey mullet and other targeted species to be able to navigate upstream to Lake Taharoa. The downstream migration of juvenile native fish can be adequately addressed through consent conditions which include the retention of a minimum flow within the fish pass and downstream of the dam, as well as monitoring of fish pass performance. As a result, the effects of the dam on fish passage has been assessed as **negligible**.

5.2.2 Effects on water quantity

Water is extracted from the impounded section of the Wainui Stream for mining and shiploading processes. Separate water take consents are held for the mining and shiploading takes and the consents cannot be exercised at the same time. The mine is currently operating within the historically consented limits for water abstraction and no further water quantity is required for the continued operation of the mine. The Wainui Stream catchment is not over-allocated and there are

no permits held by any other party to take water from the stream. As a result, adverse water quantity effects are avoided.

5.2.3 Effects of water take on marginal wetlands

The proposed water takes have the potential to have adverse effects on marginal wetlands around the edges of Lake Taharoa. Noting that the wetlands have acclimated to the lake levels that have been experienced since the installation of the dam in the Wainui Stream in the early 1970's, the magnitude of these effects has been assessed as **low** given that the water takes will be operated in a similar manner to what has been historically occurred at the mine. Importantly, TIL is proposing to retain existing conditions that require water takes to cease if the lake levels reach a certain minimum point. Conditions will also be proposed that require ongoing monitoring of the lake margin wetlands and management responses to be implemented if the lake level remains low for an extended period and the wetlands show signs of stress (other than that caused by natural seasonal conditions).

5.2.4 Effects on benthic fauna

The proposed ship-loading infrastructure including pipelines on the seabed and the tethering mechanism for the SBM will continue to occupy part of the seabed and impact on a small amount of available subtidal sandflat habitat. Given the small percentage of the available subtidal sandflat habitat this represents, this is assessed as having a low magnitude of effect on benthic ecology. The effects of constructing the pipeline have also been assessed as being **low**.

5.2.5 Effects on fish and seafood species

The discharge from the ship loading process has the potential to have adverse effects on existing habitat for fish and seafood species. Given the relatively infrequent and short-term nature of the discharge and the highly mobile nature of fish species the potential adverse effects are assessed as **negligible**. The presence of green lipped mussels in the area of the discharge indicates that ongoing ship loading discharges do not inhibit mussel colonisation and has a **negligible** effect on seafood resource species.

5.2.6 Effects on marine mammals

A number of marine mammal species can be present in the wider marine area around Port Taharoa such as Māui dolphins, common dolphins, southern right whales and Orca/killer whales. Given the low level of risk posed by the ship loading operation and the fact that it has been occurring in the vicinity since the early 1970's, the overall risk of adverse effects for marine mammals is assessed as **negligible**. Nevertheless, to recognise the sensitivity of the marine mammals that traverse the area, TIL propose conditions that require an underwater noise survey to be undertaken if 35 ship visits occur in a 12 month period, in order to inform best practice underwater noise measures.

5.2.7 Effects on coastal processes

TIL seeks to continue the ability to discharge up to 75,000m³ per day of ship loading water, including freshwater and fine sediment, up to a maximum of 7,500,000m³ per year. As a result of dilution and dispersion of the sediment plume provided by oceanic conditions, the effect of this discharge on coastal processes has been assessed as being **less than minor**.

5.2.8 Effects of discharges in the Coastal Marine Area (CMA)

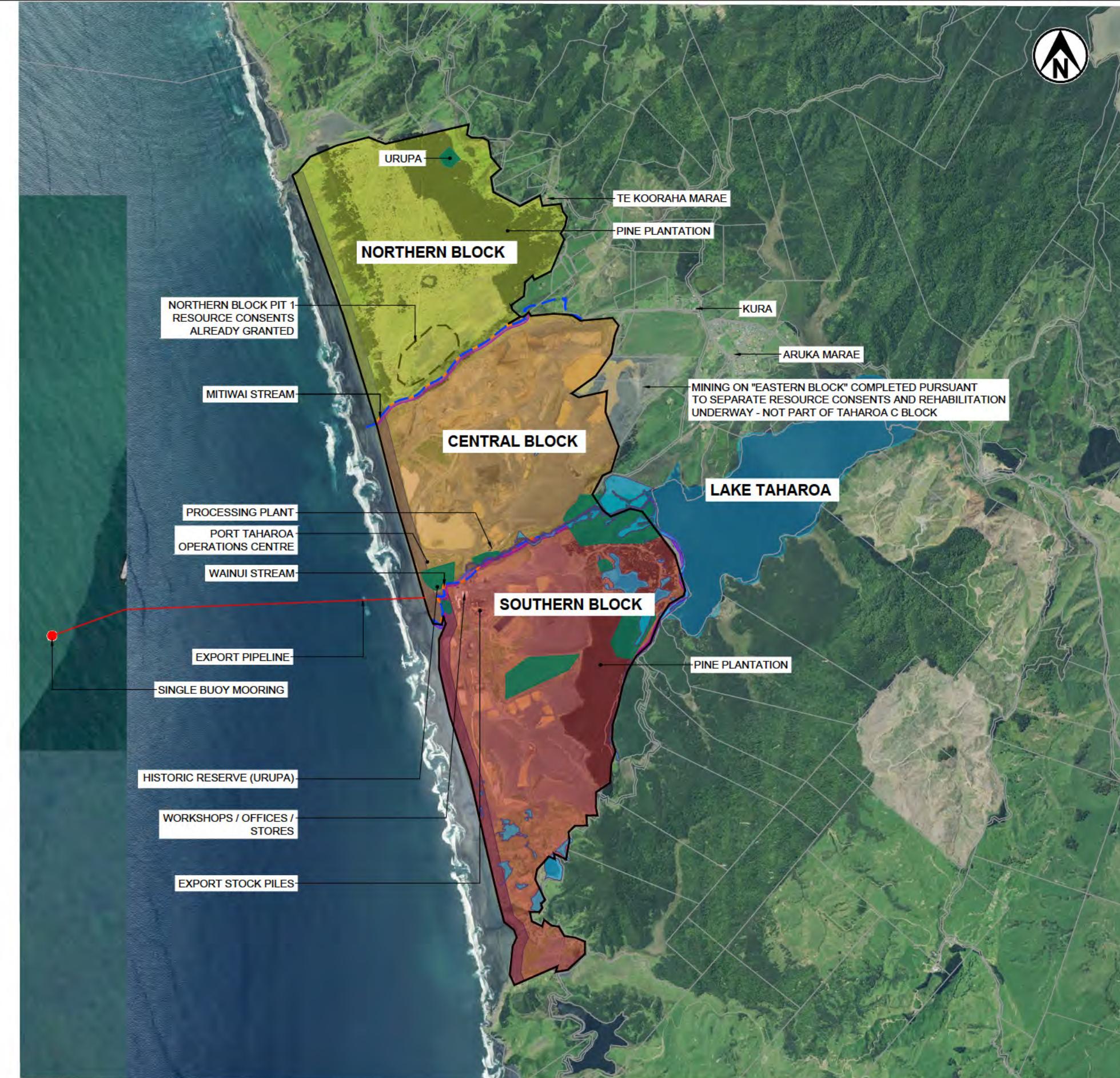
The potential adverse effects of the sediment discharge from the ship-loading events have been addressed above. The discharge includes some trace levels of naturally occurring contaminants in the ironsand that is pumped in slurry form into the ship. Because of the extremely low levels of the naturally occurring contaminants, and the dilution provided by the sea water, the discharge will not result in any measurable toxicity effect on benthic fauna.

TIL is seeking consent to continue to discharge excess process water and stormwater to the CMA at a rate of 32,000m³/day. This discharge occurs infrequently and when there is no suitable alternative to provide for the discharge on land - primarily at times of prolonged heavy rainfall. The potential ecological effects from the process water/stormwater discharge are likely to be even less than those of the ship loading discharge which were assessed to be less than minor. Correspondingly, no further actions to avoid, remedy or mitigate potential effects from the process wastewater and stormwater discharges are required apart from monitoring of the discharge quality and composition.

5.2.9 Effects on navigation safety

The continued ship movements to and from the Port of Taharoa and the occupation of the CMA by ship loading infrastructure have the potential to have adverse effects on navigational safety of other users of the CMA. However, the use of this area for recreational watercraft and commercial vessels is infrequent and the movement of ironsand export ships has been established in the area since the early 1970's. No more than one ship can access the mooring buoy at one time. Furthermore, the Port of Taharoa is operated in compliance with the New Zealand Port and Harbour Marine Safety Code, the Harbourmaster previously had no objection to the continued activity and several improvements have been implemented since the granting of the now expired resource consents in 2002. For these reasons, potential adverse effects on navigation safety have been assessed as **less than minor**.

LEGEND	
	STREAM
	PROPERTY BOUNDARIES
	MINING LICENCE AREA (TAHAROA C BLOCK)
	NORTHERN BLOCK
	CENTRAL BLOCK
	SOUTHERN BLOCK
	30m PERENNIAL WATER BODY / STREAM SETBACK
	100m MHWS SETBACK SUBJECT TO SURVEY
	ARCHEOLOGICAL AREAS RESERVED FROM MINING
	WETLAND



From: Grant Eccles [REDACTED]
Sent: Monday, 26 May 2025 4:24 pm
To: Te Makarini Mapu [REDACTED]
Cc: [REDACTED]
Subject: Taharoa Ironsands Ltd - Applications under the Fast Track Approvals Act 2024
Attachments: Consultation letter to Waikato Tainui dated 21 May 2025 (002).pdf; FT Form - Taharoa Ironsands Ltd.pdf; W-T EMP Assessment - Taharoa Ironsands Ltd.pdf

Tēnei te mihi ki a koutou

Please see attached letter regarding applications by Taharoa Ironsands Ltd (“TIL”) under the Fast Track Approvals Act 2024. Also attached is a completed Waikato-Tainui Fast Track Application Consultation Form and an assessment of the applications against Tai Tumu, Tai Pari, Tai Ao – Waikato-Tainui Environmental Plan.

If you have any written feedback and/or would value a hui with TIL to further discuss the applications, please feel free to respond to me directly at this email address.

Ngaa Mihi

Grant Eccles | Technical Director - Planning

BREP, MNZPI

Tonkin + Taylor

Level 5, 711 Victoria Street, Hamilton 3204 | PO Box 9544, Hamilton, New Zealand

[REDACTED] www.tonkintaylor.co.nz  [T+T profile](#)

 **Tonkin + Taylor** |  **CLIENT CHOICE Awards** 2024 **winner**

To send me large files you can use my [file drop](#)



Taharoa Ironsands Ltd

21 May 2025

BY EMAIL: [REDACTED]

Waikato Tainui
C/- Te Makarini Mapu
Project Advisor - Taiao
2 Bryce Street
PO Box 648
Hamilton 3204

Dear Te Makarini

Taharoa Ironsands Limited – Fast-track Approvals Act 2024 applications

1. Taharoa Ironsands Limited (**TIL**) owns and operates the Taharoa Ironsand Mine which has been in operation since 1973.
2. You may be aware that the Mine is divided into blocks known as the Northern, Central and Southern Block which are all located on Taharoa C Block, as well as the Eastern Blocks and the Te Mania Extension which are located on adjoining land.
3. TIL needs to replace its resource consents relating to the Central and Southern Blocks to continue operating the existing Mine and to enable expansion of the Mine in the future. TIL sought to do so by making an application in 2020 under the standard resource consenting process under the Resource Management Act 1991. The consenting process was lengthy and TIL was not satisfied with the decision, which led it to appeal the decision to the Environment Court on 12 December 2024.
4. Since the appeal was filed, the Fast-track Approvals Act 2024 (**FTAA**) has been enacted. The FTAA establishes a fast-track approvals regime for projects of national and regional significance in New Zealand.
5. TIL's consenting project for the Central and Southern Blocks of the Mine has been recognised by the Government as having regional and national significance having regional and national significance and has been directly referred to utilise the Fast-Track approval process. The FTAA therefore provides an alternative, and suitable, consenting pathway for the Central and Southern Blocks. TIL is also proposing to expand its existing operation into the Northern Block. New mining of this Block has also been directly referred by the Government to utilise the Fast-track process on account of its regional and national significance.
6. We are now preparing our substantive applications for both projects which will be considered under the FTAA. We are intending to file both applications with the Environmental Protection Agency in June/July 2025. Enviser is managing the preparation of the applications on behalf of TIL with input from a range of technical consultants, including Grant Eccles (planner) of Tonkin & Taylor Limited. Tonkin & Taylor has provided a high-level summary of what will be sought in each application in **Appendix A**.
7. We are writing to provide you with an opportunity to discuss the applications while they are being prepared or otherwise provide written feedback (if you do not wish to meet). We also recognise you have sought recognition of your customary interests under the Marine and Coastal Area (Takutai Moana) Act 2011 (MAC-01-04-014).

8. We are looking to arrange initial meetings to discuss the applications as soon as possible. Otherwise, we would appreciate that any written feedback is provided by 10 June 2025.
9. If you would like to discuss the applications with us, can you please let us know using the following email address: [REDACTED]

Yours faithfully



Wayne Coffey

Managing Director and CEO of Taharoa Ironsands Limited

Copy to:

Donna Flavell, Chief Executive Waikato-Tainui [REDACTED]
Taipu Paki, General Manager Rights & Interests [REDACTED]

Appendix A

Taharoa Ironsands Mine – Project summary for pre-application consultation

- **Northern Block Mining Project**
- **Central and Southern Block Mining Project**

1 Overview

Taharoa Ironsands Limited (TIL) operate an iron sand mine at Taharoa, on the West Coast of the North Island, approximately 8 km south of Kawhia Harbour. The Taharoa Mine has been in operation since 1973 (owned by New Zealand Steel until 2017). The mine site covers an area of approximately 1,300 hectares, primarily on Māori land legally described as the Taharoa C Block and the part of the coastal marine area (CMA) legally defined as Port Taharoa (**mine**).

For the purposes of mining activity, Taharoa C Block is divided into blocks. As shown on the attached plan:

- (a) the area of the site to the north of the Mitiwai Stream is known as the Northern Block.
- (b) the area of the site between the Mitiwai Stream and the Wainui Stream is known as the Central Block; and
- (c) the area of the site to the south of the Wainui Stream is known as the Southern Block.

The Central and Southern Blocks are currently operated under a suite of resource consents granted in 2006.¹ Mining activity has not historically occurred in the Northern Block.

TIL is now preparing applications for the necessary resource consents, wildlife permits and archaeological authorities under the Fast-track Approvals Act 2024 (FTAA) to authorise:

- the extraction of sand (and associated activities) on the Northern Block (known as the Northern Block Mining Project); and
- the continuation of sand extraction (and associated activities which support the entire mine, including its export operation) on the Central and Southern Blocks and in the CMA (known as the Central and Southern Block Mining Project).

The following describes the proposed mining and associated works which are subject to the applications, details the resource consents and approvals sought and provides a high-level summary of the potential effects on the environment of each project at this stage. As the applications are currently being prepared, this information is based on the work completed as of 01 May 2025, and is subject to change.

¹ TIL also hold separate resource consents for mining of (i) the “Eastern Block” granted in 2018 (mining now completed and rehabilitation underway), and (ii) the “Te Mania Extension” adjoining the Eastern Block granted in 2022 (mining yet to commence), and (iii) a small area in the Northern Block known as “Pit 1” granted in late 2024 (mining currently in progress). Mining at these locations relies on the water take resource consents and the coastal permits granted for the Central and Southern Blocks.

2 Description of proposed works

TIL propose to mine ironsand throughout the Northern, Central and Southern Blocks excluding areas where mining restrictions will apply. The areas where mining activity will not take place are within 100 m of Mean High Water Springs, 30 m of perennial water bodies (Mitiwai Stream, Wainui Stream and Lake Taharoa), and within already identified urupa and archaeological re-interment areas on the mine. Other mining exclusion areas may be identified as part of the completion of technical assessments that are currently underway. Any additional mining exclusion areas that are identified by the technical assessments will be included in the substantive FTAA applications.

Whilst the process to extract, process and export the ironsand can and does vary depending on the nature of the deposit being mined at the time, it follows the same broad steps. These activities, which are sought to be authorised as part of the Central and Southern Block Project, include:

1. **Vegetation, topsoil and overburden removal, including harvesting of trees with commercial value (pines).** Useful native species are removed prior to stripping of topsoil for use in the eco-sourced nursery on site. Topsoil is stockpiled on-site for use in future rehabilitation activities.
2. **Extraction and processing of Ironsand.** Raw Ironsand is extracted using various methods and equipment depending on ground conditions. In upper layers, standard earthmoving machinery such as excavators, bulldozers, and trucks are used to collect the ironsand and deposit it into a Dry Mining Unit (DMU). The DMU mixes the ironsand with water to form a slurry, which is then pumped to a treatment plant for titanomagnetite extraction.
3. During this process, groundwater and surface water may enter the active excavation area. To maintain dry working conditions, this water may be pumped out as required. However, as mining progresses to deeper layers, maintaining a dry pit may become impractical. In such cases, a cutter-suction dredge is used in a water-filled pond. The dredge floats on the water and uses a submerged dredge head to cut, fluidise, and pump the Ironsand slurry through a pipeline to the treatment plant. The dredge is capable of operating at depths of 8 to 15 meters below the pond surface. In some instances, a long-reach excavator may also be used to extract material from within the pond.
4. **Processing.** The extracted ironsand is transported to a centralised processing plant where it is concentrated and processed. The ironsand is refined using screening and gravity separation. The ironsand is mixed into a slurry and pumped through a seabed pipeline to a bulk carrier ship moored at the Port of Taharoa. The export pipelines run from the processing and storage facility located on land to a Single Buoy Mooring (SBM), located approximately 3.5 km offshore.
5. **Ship loading and dewatering.** Bulk carrier ships moor at the SBM to receive the ironsand in slurry form from the export pipelines. Each ship contains dewatering equipment and the resulting freshwater, containing residual fine suspended material (inert, inorganic geological material) that is removed from the ironsand slurry, is discharged from the ship to the sea. The discharge forms a buoyant plume that floats on the seawater surface before dispersal and dilution. Ship loading operations are currently undertaken approximately 20 times per year and will increase in frequency in future as production increases up to a projected maximum of 35 times per year. Each ship loading activity takes approximately 90 hours (of pumping time) however weather conditions have an influence on loading timeframes.

6. **Tailings disposal and rehabilitation of mined areas.** The tailings (ferrous and non-ferrous sand, silts and clays) which are separated from the exportable product are pumped as a slurry to tailings disposal areas. The discharged slurry dewateres by gravity, with the drainage water collected and directed into a settlement pond or ponds. Once the tailings have dewatered, mechanical plant (excavators and dozers) redistribute the material to form the grade and levels required by the rehabilitation plan for that area. Following this the land may be stabilised, top soiled and replanted.

To operate the mine, the process requires the abstraction of water from the Wainui Stream via a constructed dam incorporating a fish pass, and the discharge of stormwater to the Wainui Stream and the discharge of process water to settling ponds. Excess stormwater and process water is discharged to the CMA via the ship loading pipelines.

The activities sought to be authorised as part of the Northern Block Mining Project include (but are not limited to):

- (a) vegetation, topsoil and overburden removal, and excavation and processing of iron sand above and below the water table (as above);
- (b) the transportation of that product via temporary pipelines to the established processing plant on the Central and Southern Block;
- (c) processing (as above);
- (d) discharge of process water to land; and
- (e) tailing disposal and rehabilitation of mined areas (as above).

The Northern Block Mining Project will rely on / be supported by the processing infrastructure located on the Central and Southern Blocks. It will also rely on / be supported by the consents being sought for the Central and Southern Block to take and use water from the Wainui Stream, discharge of stormwater to the Wainui Stream and the CMA, discharge of process water to the CMA and transport of processed product from the processing facility through the ship-loading pipelines to the CMA. No changes are being proposed to the existing water take limits and discharge limits to facilitate mining of the Northern Block.

3 Approvals sought

3.1 Resource Management Act 1991

A summary of the resource consents that are required for the Northern, Central and Southern Blocks is set out below.

3.1.1 Resource consents required for the Northern Block

National Environmental Standard for Freshwater 2020 – consents to clear vegetation and undertake earthworks within and within 10m of a natural inland wetland. Consents are also required to take, use, dam, or divert water within and within 100 m of a natural inland wetland and to discharge water within and within 100 m of a natural inland wetland.

National Environmental Standard for Commercial Forestry 2017 – consent to harvest pine trees within Class 8e land.

Operative Waikato Regional Plan – consents for soil disturbance and vegetation clearance activities, diversion and taking of groundwater and surface of water associated with mining above and below the water table, discharge of a contaminant to land or water (process water and placement of tailings) and for overburden disposal to land.

Additionally, resource consent is required under the Operative Waitomo District Plan for the potential disturbance of archaeological sites recorded in the Plan - this consent applies to the Northern Block only given that mining has occurred since the early 1970's on the Central and Southern Blocks.

3.1.2 Resource consents required for the Central and Southern Blocks

The resource consents set out above are also required for the Central and Southern Blocks.² In addition, the following resource consents are required for the Central and Southern Blocks Project:

Operative Waikato Regional Plan – consents for the damming, diversion and taking of surface water and groundwater, for stream bed disturbance, and for the discharge of stormwater to surface water.

Operative and Proposed Waikato Regional Coastal Plans – consents for the use and occupation of the Coastal Marine Area by the export pipelines and the SBM, for discharges to and depositions in the CMA from shiploading activities, and for the discharge of stormwater from the export pipelines.

3.2 Wildlife Act 1953

A wildlife permit will be required to manage lizards if they are identified prior to vegetation removal or ground disturbance works.

3.3 Heritage New Zealand Pouhere Taonga Act 2014

Archaeological authorities will be sought due to the potential for currently undiscovered archaeological features to be disturbed by mining activities (excluding urupa and archaeological areas reserved from mining which will not be disturbed).

4 Benefits of the Projects

The continuation of the mining activity on the Taharoa C Block that will be facilitated by the approvals sought under the FTAA will generate significant regional and national benefits. The Central and Southern Block Mining Project and Northern Block Project will directly contribute billions to the New Zealand economy (through employment, income for landowners, business for regional supplies and the payment of taxes).

The mine provides significant employment opportunities for the community, particularly local Māori. Over 82% of income earned by local Ngāti Mahuta comes from employment at the mine. TIL has a core workforce of 170-80 people but employs upwards of 300 staff and contractors.

TIL relies on locally sourced goods and services including the supply of electricity and services from surrounding areas including Kawhia, Te Kuiti, Otorohanga, Te Awamutu and Hamilton. TIL also relies on specialist sub-contractor support including the maintenance and management of specialised mine machinery and equipment. The support TIL relies on (and will continue to rely on) from

² Excluding the resource consent required for archaeological site disturbance.

surrounding centres for the Northern Block Project and Central and Southern Block Mining Project will inject billions into the local economy over the life of the consents sought for the Project.

The mine also provides essential benefits to the local Taharoa Village which was established around the mine and exists today because of the substantial financial contribution the mine makes every year.

5 Summary of potential adverse effects on the environment

The following high-level summary of effects on the environment is based on technical assessments previously completed in relation to mining of the Central and Southern blocks. These assessments are currently being updated, and additional assessments are being completed for mining of the Northern Block. A full assessment of effects supported by technical assessments will be included in the applications for the Northern and Central/Southern Blocks respectively.

5.1 Effects common to the Northern, Central and Southern Blocks

5.1.1 Effects on terrestrial ecology (including bats, birds, lizards)

Disturbance from mining activities has the potential to have adverse effects on wetland and grassland bird species. The loss of existing grassland due to the mining activity may also result in potential injury or death of various threatened native skink present in low numbers in the grassland. The overall level of effect on terrestrial ecology has been assessed as being **low** with the provision of an over-arching Environmental Management Plan (EMP), including an Avifauna Management Plan, Bat Management Plan and a Lizard Management Plan, and imposition of appropriate conditions such as a requirement for there to be a 30 m planting buffer around all natural water bodies. Subject to the imposition of conditions, the overall level of effects on terrestrial ecology has been assessed as **minor**.

5.1.2 Effects of mining below the water table

When mining activity interacts with groundwater there may be the potential for adverse effects on surface freshwater bodies if there is a hydraulic connection between the groundwater and surface water. This connection will be carefully monitored. Any adverse effects on the primary freshwater bodies on the site (the Mitiwai Stream and the Wainui Stream) can be avoided and mitigated through consent conditions including for example, requirements to maintain a minimum flow within the streams.

5.1.3 Effects of discharge to land

The discharge of tailings and surplus process water to land has the potential to cause adverse effects on landform, groundwater and nearby waterways. The tailings material is re-formed as close as practicable to the original landform. The discharge of surplus process water does not result in contamination of groundwater due to the natural filtering provided by the sandy ground conditions. Overall, the adverse effects of discharges to land have been assessed as **less than minor**.

5.1.4 Land disturbance effects

The mining operation is located in a high-risk erosion area and the mining and stockpiling of iron sand has the potential to result in adverse effects on land stability. Given that the mine has a good operational history with no erosion issues requiring mitigation, a rehabilitation process and

revegetation plan is followed for disturbed areas, and perennial waterbody mining setbacks are imposed, any adverse effects can be considered **negligible**.

5.1.5 Archaeological effects

Taharoa C Block is and has always been Māori land which means that there is elevated potential for accidental discovery of koi iwi and other taonga in the dune environment of the area. Ngāti Mahuta derived tikanga and protocols apply when discoveries of koiwi and taonga occur in the Taharoa dune environment as a result of mining activity, and that tikanga/protocol is reflected in existing and proposed consent conditions. Defined urupā are located within the dune system where accidentally discovered koiwi are interred with appropriate tikanga being observed. A buffer in which no mining occurs is observed around each urupā.

All of these measures and practices will continue and mitigate the potential adverse effects in relation to archaeology to **less than minor** levels.

5.1.6 Cultural effects

In considering cultural effects, it is important to note the cultural benefits the ongoing operation of the mine has for Ngati Mahuta as tangata whenua. These benefits include employment benefits, royalties, and support for the local community. Ngati Mahuta, though the Taharoa C Block Incorporation, own the land on which the mine operates and is paid significant royalties from the mine. The mine also supports the employment and growth of Ngati Mahuta whanau. The local employment opportunity generated by the mine has allowed the local community to retain members of the community who may have otherwise moved away to seek employment elsewhere and lost their connection to the land.

TIL understand the views of the respective Taharoa Marae and Te Runanga in relation to the potential cultural effects of the Central and Southern Block Project. In summary, at a high-level:

The damming of the Wainui Stream has the potential to have adverse effects on the health of Lake Taharoa and its indigenous fishery, an important matter to Ngāti Mahuta. The maintenance of the effectiveness of the fish pass at the dam in the Wainui Stream is important to ensure the presence of indigenous fish species in the stream and lake upstream of the dam continues.

The maintenance and monitoring of baseflow in the Mitiwai Stream is also an important matter from a cultural perspective. TIL has engaged expert consultants to monitor the stream to ensure that TIL understands the potential effects of its mining activity on the Stream, which will be managed through consent conditions. Rehabilitation of the mine site to a sustainable landform and land cover is also an important matter to Ngāti Mahuta. Representatives of Ngāti Mahuta have shared their desire for the land to be returned to its natural state following mining activity (being rolling sand dunes with some pockets of vegetation). In that regard, TIL has developed and is implementing an overall Site Rehabilitation Plan and updated Conceptual Site Closure Plan in place to be implemented in the event that the mine closes in the future.

TIL propose to consult with the respective Taharoa Marae and Te Runanga in the preparation of the various management plans that govern the management of effects at the mine. Such consultation and engagement benefits both parties – TIL will gain the benefit of access to the skills and expertise that reside within the marae and hapu whanau, while marae and hapu whanau will have the opportunity to influence the content of management plans that will play an important part in managing the ongoing effects of the mining activity. TIL will also propose the provision of a website

which includes monthly monitoring records to communicate data to mana whenua and the community.

5.1.7 Air Quality Effects

The mine is located in an isolated location subject to extreme westerly winds. In this environment, there is potential for wind-blown sand from the mine site to generate adverse effects on adjoining and adjacent sites to the mine, including in Taharoa Village. TIL implement a range of avoidance and mitigation techniques to control such emissions including the erection of fencing to trap sand particles, placing ground cover (for example, coconut matting) on exposed areas, using mobile and automated fixed watering systems on internal site roads, enforcing vehicle speed limits, and progressively rehabilitating mined out areas. These measures mean that the mine site can operate in accordance with the relevant permitted activity rule of the Waikato Regional Plan with regards to air quality. TIL proposes to implement a Dust Management Plan to manage the implementation of these dust prevention mechanisms. Although there remains the potential for off-site discharges of dust due to the coastal environment, these discharges are highly unlikely to result in adverse effects to human health. Acoustic Effects

The mining activities have the potential to have adverse noise effects on key sensitive receptors on sites adjoining the Northern Block (1891 Taharoa Road, 1891A Taharoa Road, Te Kōraha Marae and 25 Rotopuhoe Road). However, these receptors are located several hundred metres from where mining will occur on the Northern Block and given this separation distance, it is expected that the works will be able to be managed to comply with the Waitomo District Plan daytime and nighttime noise limits. As a result, any potential adverse effects from noise from mining on the Northern Block on sensitive receivers is expected to be **less than minor**.

Mining on the Central and Southern Blocks has been continuous since the 1970s and benefits from existing use rights with respect to noise levels and associated acoustic effects. Notwithstanding this, noise levels are expected to be compliant with District Plan noise limits. TIL will continue to adopt the best practicable option to ensure that the emission of noise from these blocks does not exceed a reasonable level for any nearby sensitive receptors.

5.2 Effects relating to the Central and Southern Blocks only

5.2.1 Effects of damming Wainui Stream

Authorisation of the dam in the Wainui Stream will result in a similar water regime to what is currently present. Fish passage will be provided for via the monitoring and maintenance of a fish pass which achieves the intended purpose of allowing grey mullet and other targeted species to be able to navigate upstream to Lake Taharoa. The downstream migration of juvenile native fish can be adequately addressed through consent conditions which include the retention of a minimum flow within the fish pass and downstream of the dam, as well as monitoring of fish pass performance. As a result, the effects of the dam on fish passage has been assessed as **negligible**.

5.2.2 Effects on water quantity

Water is extracted from the impounded section of the Wainui Stream for mining and shiploading processes. Separate water take consents are held for the mining and shiploading takes and the consents cannot be exercised at the same time. The mine is currently operating within the historically consented limits for water abstraction and no further water quantity is required for the continued operation of the mine. The Wainui Stream catchment is not over-allocated and there are

no permits held by any other party to take water from the stream. As a result, adverse water quantity effects are avoided.

5.2.3 Effects of water take on marginal wetlands

The proposed water takes have the potential to have adverse effects on marginal wetlands around the edges of Lake Taharoa. Noting that the wetlands have acclimated to the lake levels that have been experienced since the installation of the dam in the Wainui Stream in the early 1970's, the magnitude of these effects has been assessed as **low** given that the water takes will be operated in a similar manner to what has been historically occurred at the mine. Importantly, TIL is proposing to retain existing conditions that require water takes to cease if the lake levels reach a certain minimum point. Conditions will also be proposed that require ongoing monitoring of the lake margin wetlands and management responses to be implemented if the lake level remains low for an extended period and the wetlands show signs of stress (other than that caused by natural seasonal conditions).

5.2.4 Effects on benthic fauna

The proposed ship-loading infrastructure including pipelines on the seabed and the tethering mechanism for the SBM will continue to occupy part of the seabed and impact on a small amount of available subtidal sandflat habitat. Given the small percentage of the available subtidal sandflat habitat this represents, this is assessed as having a low magnitude of effect on benthic ecology. The effects of constructing the pipeline have also been assessed as being **low**.

5.2.5 Effects on fish and seafood species

The discharge from the ship loading process has the potential to have adverse effects on existing habitat for fish and seafood species. Given the relatively infrequent and short-term nature of the discharge and the highly mobile nature of fish species the potential adverse effects are assessed as **negligible**. The presence of green lipped mussels in the area of the discharge indicates that ongoing ship loading discharges do not inhibit mussel colonisation and has a **negligible** effect on seafood resource species.

5.2.6 Effects on marine mammals

A number of marine mammal species can be present in the wider marine area around Port Taharoa such as Māui dolphins, common dolphins, southern right whales and Orca/killer whales. Given the low level of risk posed by the ship loading operation and the fact that it has been occurring in the vicinity since the early 1970's, the overall risk of adverse effects for marine mammals is assessed as **negligible**. Nevertheless, to recognise the sensitivity of the marine mammals that traverse the area, TIL propose conditions that require an underwater noise survey to be undertaken if 35 ship visits occur in a 12 month period, in order to inform best practice underwater noise measures.

5.2.7 Effects on coastal processes

TIL seeks to continue the ability to discharge up to 75,000m³ per day of ship loading water, including freshwater and fine sediment, up to a maximum of 7,500,000m³ per year. As a result of dilution and dispersion of the sediment plume provided by oceanic conditions, the effect of this discharge on coastal processes has been assessed as being **less than minor**.

5.2.8 Effects of discharges in the Coastal Marine Area (CMA)

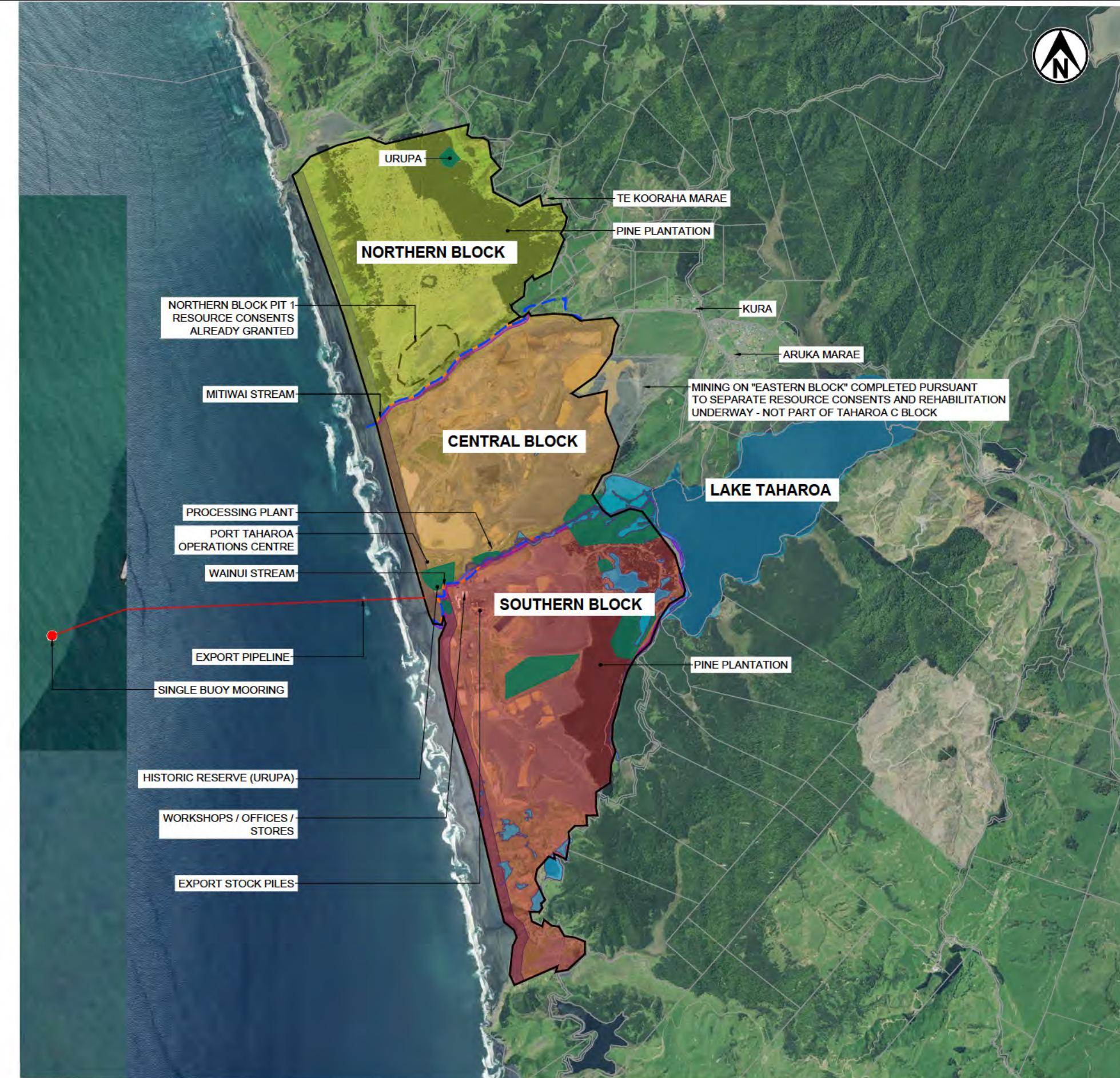
The potential adverse effects of the sediment discharge from the ship-loading events have been addressed above. The discharge includes some trace levels of naturally occurring contaminants in the ironsand that is pumped in slurry form into the ship. Because of the extremely low levels of the naturally occurring contaminants, and the dilution provided by the sea water, the discharge will not result in any measurable toxicity effect on benthic fauna.

TIL is seeking consent to continue to discharge excess process water and stormwater to the CMA at a rate of 32,000m³/day. This discharge occurs infrequently and when there is no suitable alternative to provide for the discharge on land - primarily at times of prolonged heavy rainfall. The potential ecological effects from the process water/stormwater discharge are likely to be even less than those of the ship loading discharge which were assessed to be less than minor. Correspondingly, no further actions to avoid, remedy or mitigate potential effects from the process wastewater and stormwater discharges are required apart from monitoring of the discharge quality and composition.

5.2.9 Effects on navigation safety

The continued ship movements to and from the Port of Taharoa and the occupation of the CMA by ship loading infrastructure have the potential to have adverse effects on navigational safety of other users of the CMA. However, the use of this area for recreational watercraft and commercial vessels is infrequent and the movement of ironsand export ships has been established in the area since the early 1970's. No more than one ship can access the mooring buoy at one time. Furthermore, the Port of Taharoa is operated in compliance with the New Zealand Port and Harbour Marine Safety Code, the Harbourmaster previously had no objection to the continued activity and several improvements have been implemented since the granting of the now expired resource consents in 2002. For these reasons, potential adverse effects on navigation safety have been assessed as **less than minor**.

LEGEND	
	STREAM
	PROPERTY BOUNDARIES
	MINING LICENCE AREA (TAHAROA C BLOCK)
	NORTHERN BLOCK
	CENTRAL BLOCK
	SOUTHERN BLOCK
	30m PERENNIAL WATER BODY / STREAM SETBACK
	100m MHWS SETBACK SUBJECT TO SURVEY
	ARCHEOLOGICAL AREAS RESERVED FROM MINING
	WETLAND



Waikato-Tainui Fast Track Application Consultation Form

Section 1: Applicant details

Is this Fast-Track application listed under Schedule 2, Part A or applying to be referred under Schedule 2, Part b? (Select option)

- Listed 2a

1. Applicant name (individual or organisation name)

Taharoa Ironsands Ltd

2. Contact person (name)

Grant Eccles

3. What is your job title

Technical Director - Planning

4. What is your email address?

[REDACTED]

5. What is your phone number

[REDACTED]

6. What is your postal address?

Tonkin + Taylor Ltd, P O Box 9544, Waikato Mail Centre, Hamilton 3204

Section 2: Project location

Site address or location

Provide a cadastral map and/or aerial imagery to clearly show the project location.

Add the address or describe the location.

Taharoa C Block, Taharoa – please see Project Summary attached

Who are the registered legal land owner(s)?

Please write your answer here

The Proprietors of Taharoa C Block

Section 3: Project details

This part provides the details to the project.

What is your project name?

Please write your answer here

Taharoa Ironsands Limited – Central and Southern Block Mining

Taharoa Ironsands Limited – Northern Block Mining

Is the project Regionally or Nationally significant?

Please write your answer here

Both Regionally and Nationally Significant

What is the project summary?

Please provide a brief summary (no more than 2-3 lines) of the proposed project.

Please write your answer here

Please see attached Project Summary

What are the project details?

Please provide details of the proposed project, its purpose, objectives, and the activities it involves (only a general level of detail is required).

Please write your answer here

Please see attached Project Summary

Have you engaged with mana whenua?

- Yes

If yes, please describe your engagement (please attach any evidence for this engagement)

Engagement has been ongoing between TIL and Ngati Mahuta whanau at Taharoa for several years with regards to consenting processes associated with the mine. This engagement has included hui

with marae and runanga representatives as well as with individual whanau who own land adjacent to the mine site. Specifically with regards to the Fast Track Approvals Act process, comments and feedback has been sought from all previously engaged mana whenua parties and whanau and TIL will meet with any who wish to do so.

Describe the staging of the project, including the nature and timing of the staging

Please write your answer here

Please see attached Project Summary

What are the details of the regime under which approval is being sought?

The different regimes are:

- Resource Management Act 1991
 - resource consent
- Wildlife Act 1953
 - authority to do anything otherwise prohibited
- Heritage New Zealand Pouhere Taonga Act 2014
 - archaeological authority

Please write your answer here

TIL requires resource consents under the RMA, permits under the Wildlife Act, and authorities under the Heritage New Zealand Pouhere Taonga Act.

What applications have you already made for approvals on the same or a similar project?

Please provide details and any decision made of:

- Applications
- Notices

Please write your answer here

Please see attached Project Summary

If the approval(s) are granted, when do you anticipate construction activities will begin, and be completed?

Please provide a high-level timeline outlining key milestones:

Please explain your answer here

Mining activity has occurred on the Central/Southern Blocks since the early 1970's and is currently occurring on the Central/Southern Blocks under s124 RMA rights. The mining activity will continue should the approvals be granted. A small area of mining is currently occurring on the Northern Block pursuant to consents granted to TIL by Waitomo DC and Waikato RC in late 2024. Mining activity on the balance of the Northern Block will begin within 6 months of the approvals being granted for the Northern Block project. A 35 year consent duration will be sought for all the RMA consents for both the Central/Southern Block and Northern Block projects.

Section 4: Treaty settlements

What treaty settlements apply to the geographical location of the project?

Include a summary of the relevant principles and provisions in those settlements and any statutory acknowledgement areas.

Please write your answer here

A Statutory Acknowledgement relevant to the Taharoa rohe was made for Ngati Maniapoto through the Maniapoto Claims Settlement Act 2022. The statutory acknowledgment took effect in mid-2023 and in terms of the Taharoa C Block applies only to the Mitiwai Stream. An assessment against the Ngati Maniapoto Iwi Environmental Management Plan was made as part of the prior RMA reconsenting applications for the Central/Southern Block and is equally applicable to the Northern Block project. The Central/Southern and Northern Block projects are consistent with the Ngati Maniapoto Iwi Environmental Management Plan.

Are there any identified parcels of Maaori land within the project area, marae, and identified waahi tapu?

- Yes

If yes, what are they?

The Taharoa C Block (ie the site) is Māori freehold land under the Te Ture Whenua Māori Act 1993.

The Taharoa rohe includes Aaruka Marae and Te Kooraha Marae while Maketuu Marae is located nearby in Kawhia.

Identified urupa are located within and adjacent to the Taharoa C Block.

Is the project proposed in any customary marine title area, protected customary rights area, or aquaculture settlement area declared under s 12 of the Maaori Commercial Aquaculture Claims Settlement Act 2004 or identified within an individual iwi settlement?

- No

If yes, what are they?

Has there been an assessment of any effects of the activity on the exercise of a protected customary right?

- No

Please explain your answer here:

Not applicable as no protected customary rights exist.

Will the project deliver regionally or nationally significant infrastructure? (Select option)

- Regional significant infrastructure

- National significant infrastructure

Please explain your answer here

The Port of Taharoa (which is part of the existing mine infrastructure in the Coastal Marine Area) meets the Proposed Waikato Regional Coastal Plan definition of Regionally Significant Infrastructure.

Section 5: Assessment

Te Ture Whaimana o Te Awa o Waikato – Vision and Strategy for the Waikato River and Tai Tumu, Tai Pari, Tai Ao – Waikato Tainui Environmental Plan

Please assess the proposal against Te Ture Whaimana objectives A – M, and Tai Tumu, Tai Pari, Tai Ao – Waikato Tainui Environmental Plan. The assessment of the likelihood and, or magnitude of the effect should be undertaken from a Waikato-Tainui perspective.

The assessment should be undertaken prior to engagement and consultation with iwi and manawhenua. Ideally consultation aims to seek agreement between the applicant and iwi/manawhenua toward ensuring protection and restoration of Te Awa o Waikato and her environs.

The ultimate objective should be to avoid all detrimental effects. All consents should demonstrate betterment over time. We recommend assessment against all other relevant iwi and hapuu environmental plans.

Note: Te Tumu, Tai Pari, Tai Ao – Waikato Tainui Environmental Plan provides an overarching Waikato-Tainui perspective and, within the Waikato-Tainui rohe, marae and hapuu may have different perspectives on the relative importance of components of the Plan. It is critical to understand the perspectives of hapuu and marae as it relates to specific issues and matters and effective engagement with hapuu and marae will lead to this understanding. There is simply no 'one-size-fits-all, uniform' Waikato-Tainui wide view of environmental matters. However, the Plan provides key guidance for external and internal users and should serve as a baseline for approaching environmental matters of importance to Waikato-Tainui

TE TURE WHAIMANA O TE AWA O WAIKATO – VISION AND STRATEGY FOR THE WAIKATO RIVER

Please review Te Ture Whaimana o Te Awa o Waikato – Vision and Strategy for the Waikato River and provide an assessment within the following table:

Please fill if the project is within the Waikato River catchment, additionally, if you think this adds value feel free to fill out as it aligns to your project.

Te Ture Whaimana – Objectives	Assessment
A: The restoration and protection of the health and wellbeing of the Waikato River.	
B: The restoration and protection of the relationships of Waikato-Tainui with the Waikato River, including their economic, social, cultural and spiritual relationships.	
C: The restoration and protection of the relationships of Waikato River Iwi according to their tikanga and kawa with the Waikato River, including their economic, social, cultural and spiritual relationships.	
D: The restoration and protection of the relationships of the Waikato Region's communities with the Waikato River, including their economic, social, cultural and spiritual relationships.	
E: The integrated, holistic and coordinated approach to management of the natural, physical, cultural and historic resources of the Waikato River.	
F: The adoption of a precautionary approach towards decisions that may result in significant adverse effects on the Waikato River, and in particular those effects that threaten serious or irreversible damage to the Waikato River.	
G: The recognition and avoidance of adverse cumulative effects, and potential cumulative effects, of activities undertaken both on the Waikato River and within its catchments on the health and wellbeing of the Waikato River.	
H: The recognition that the Waikato River is degraded and should not be required to absorb further degradation as a result of human activities.	
I: The protection and enhancement of significant sites, fisheries, flora and fauna.	
J: The recognition that the strategic importance of the Waikato River to New Zealand's, social, cultural, environmental and economic wellbeing requires the restoration and protection of the health and wellbeing of the Waikato River.	



K: The restoration of water quality within the Waikato River, so that it is safe for people to swim in and take food from over its entire length.	
L: The promotion of improved access to the Waikato River to better enable sporting, recreational and cultural opportunities.	
M: The application to the above of both maatauranga Maaori and latest available scientific methods.	

Is the project consistent with Te Ture Whaimana o Te Awa o Waikato – Vision and Strategy for the Waikato River?

- Yes
- No

Please explain your answer here:

The site is not within the Waikato or Waipa River catchments thus Te Ture Whaimana is not applicable in this instance.



07 858 0430 • 0800 TAINUI • wtcomms@tainui.com • waikatotainui.com

4 te ara o Bryce, Pouaka Taapeta 648, Kirikiriroa 3204, Aotearoa

TAI TUMU, TAI PARI, TAI AO - WAIKATO-TAINUI ENVIRONMENTAL PLAN

"Hoki ake nei au ki tooku awa koiora me ngoona pikonga, He kura tangihia o te maataamuri" - The river of life, each curve more beautiful than the last.

Assess the potential and actual adverse effects of the proposed activity against the vision of the plan (to restore and protect the environment), Chapter 7 - towards environmental enhancement, and the relevant objectives and policies in Section C and D, in particular Chapter 10. The assessment should be documented in the provided table. Ensure you reference and review the relevant sections of WTEMP that are specific to the proposed activity.

Clearly list the applicable objectives and policies and provide a thorough assessment of the proposed activity against each.

An assessment against the Waikato-Tainui Environmental Plan is attached.

VISION OF THE PLAN – KIINGI TAAWHIAO, HE MAIMAI AROHA	
Vision	Assessment/ Comment
He Maimai Aroha	<p>The Vision of the Plan is taken from a maimai aroha of the second Maaori King, Taawhiao, where he laments with a heavy heart his longing for and adoration of the taonga; natural resources of his homeland.</p> <p>The maimai aroha of Kiingi Taawhiao is the key driver and indicator of environmental health and wellbeing in this Plan.</p> <p>Waikato-Tainui aspires to the restoration of the environment to the state that Kiingi Taawhiao observed when he composed his maimai aroha.</p> <p>Please provide commentary on how your project achieves the vision of the plan.</p>
SECTION B: KETE MAATURANGA – TOOLBOX	
Chapter	Assessment/ Comment
Chapter 7: Whakapakari i te Taiao – Towards environmental enhancement	<p>The goal of Waikato-Tainui is to ensure that the needs of present and future generations are provided for in a manner that goes beyond sustainability towards an approach that enhances the environment. Please review Chapter 7 and provide an assessment or commentary on how your project aligns with this goal.</p>

SECTION C: ISSUES, OBJECTIVES, POLICIES AND METHODS – GENERAL WAIKATO-TAINUI ENVIRONMENTAL MATTERS - NGAA TAKE, NGAA WHAAINGA, NGAA KAUPAPA HERE, NGAA TIKANGA AA-TAIAO WHAANUI

Chapter	Identify and list relevant Objectives and Policies within this column	Assessment/ Comment
Chapter 10: Whakatupuranga Waikato-Tainui 2050 - Tribal Strategic Plan	Collaboration and consistency	
Chapter 11: Te Ture Whaimana o te Awa o Waikato – The Vision and Strategy for the Waikato River	Te Ture Whaimana prevails	
Chapter 12: Right of first refusal on crown lands	Protecting the integrity of the RFR A 'sale' by another name Crown land administered by or transferred to local authorities	
Chapter 13 Ngaa Papakainga me ngaa Marae – Waikato-Tainui Communities	Papakainga development in rural and urban areas	
Chapter 14 - Ngaa Mahi Tuku Iho a Waikato-Tainui Customary Activities	Waikato-Tainui able to access and undertake customary activities Waikato-Tainui customary activities are protected and enhanced	
Chapter 15 Ngaa Taonga Maaori tuku iho me te Aarai Taiao – Natural Heritage and Biosecurity	Indigenous Biodiversity Landscape planning and natural heritage Control agents New organisms and genetically modified organisms	
Chapter 16 Ngaa Taonga tuku iho, ngaa Waahi Tapu, ngaa Waahi Tuupuna – Valuable historical items, highly prized sites, sites of significance	Site management protocols Managing waahi tapu and waahi tuupuna Discovery of taonga (including archaeological sites) Areas and sites of significance	
Section 17 Ngaa Moorearea Ao Tuuroa – Natural Hazards	Land use and structures Risk management Climate change	

SECTION D: ISSUES, OBJECTIVES, POLICIES AND METHODS – SPECIFIC ENVIRONMENTAL AREAS - NGAA TAKE, NGAA WHAAINGA, NGAA KAUPAPA HERE, NGAA TIKANGA –TAIAO WHAAITI

Chapter 19 – Te Waai Maaori - Water	The relationship between Waikato-Tainui and water	
	Water quality	
	Water quality (integrated catchment management)	
	Water quantity and allocation	
Chapter 20: Ngaa Repo - Wetlands	Wetland mauri and condition, hauanga kai, habitat	
	Access	
Chapter 21 Te Whenua - Land	Effectively manage soil erosion	
	The life supporting capacity of land and soils	
	Effectively manage land contamination	
	Achieve integrated catchment management, including floodplain and drainage management	
Chapter 22 – He Mahinga Ika - Fisheries	Holistic and coordinated approach	
	Taonga species	
	Fisheries management tools	
Chapter 23 – Te Ararangi – Air	Discharge Quality and Amenity	
Chapter 24 – Te Taiao Moana - Coastal Environment	Water quality	
	Coastal erosion	
	Coastal access	

	Activities in the coast area	
	Integrated management and relationships	
Chapter 25 – Ngaa whakaritenga moo ngaa whenua o Waikato-Tainui – Land Use Planning	Approach to land use and development	
	Urban and rural development	
	Positive environmental and cultural effects	
Chapter 26 – Waihanga Matua – Infrastructure	Waikato-Tainui engagement	
	Infrastructure development, upgrade and maintenance	
	Liquid, solid and hazardous waste	
	Transportation	
Chapter 27 – Whakaputa hiko – Electricity Generation	Electricity generation and transmission	
	Alternative electricity generation sources	
	Local cost, local benefit	
Chapter 28 – Keri Oopapa – Mining and Quarrying oil, gas, minerals	Mining	
	Local cost, local benefit	
Chapter 29 – Ngaa Mahi Paarekareka Me Te Manaaki Manuwhiri -- Recreation and Tourism	Adverse effects	
	Authenticity	

Is the project consistent with Tai Tumu, Tai Pari, Tai Ao – Waikato-Tainui Environmental Plan?

- Yes



Please explain

Please see attached assessment

Tim Fletcher

Subject: TIL - Fast-track applications
Location: Microsoft Teams Meeting

Start: Mon 20/10/2025 12:00 pm
End: Mon 20/10/2025 1:00 pm

Recurrence: (none)

Meeting Status: Meeting organizer

Organizer: Stephanie de Groot
Required Attendees: Jared Pettersson; Te Makarini Mapu

Microsoft Teams [Need help?](#)

Join the meeting now

Meeting ID: [REDACTED]

Passcode: [REDACTED]

Dial in by phone

[+64 4 889 7908,,580455589#](#) New Zealand, Wellington

[Find a local number](#)

Phone conference ID: [REDACTED]

For organizers: [Meeting options](#) | [Reset dial-in PIN](#)

From: Harach, Olivia OH [REDACTED]
Sent: Wednesday, 25 June 2025 2:25 pm
To: Holly-Marie Rearic; Stephanie de Groot
Subject: FW: Invitation to Maketu Marae to meet or provide written feedback – Taharoa Ironsands Limited Fast-track Applications
Attachments: Consultation letter to Maketu Marae dated 24 June 2025.pdf



Olivia Harach
Taharoa Ironsands Ltd
P [REDACTED]
E [REDACTED]

From: Harach, Olivia OH
Sent: Wednesday, 25 June 2025 2:14 pm
To: [REDACTED]
Cc: Coffey, Wayne WC [REDACTED]
Subject: Invitation to Maketu Marae to meet or provide written feedback – Taharoa Ironsands Limited Fast-track Applications

Good afternoon

Please see the **attached** letter in relation to applications that TIL is preparing for the Central and Southern Block Project and Northern Block Project under the Fast-track Approvals Act 2024.

The purpose of the letter is to offer representatives of the Maketu Marae the opportunity to discuss the applications with TIL and/or for you to provide your written feedback on the applications.

Due to an administrative error, the attached letter was not sent when we originally intended to send it a few weeks ago.

Please let me know if you have any queries.

Regards
Wayne



Taharoa Ironsands Ltd

24 June 2025

BY EMAIL: [REDACTED]

Maketuu Marae
614 Kaora Street
Kawhia 3889

Taharoa Ironsands Limited – Fast-track Approvals Act 2024 applications

1. Taharoa Ironsands Limited (**TIL**) owns and operates the Taharoa Ironsand Mine which has been in operation since 1973.
2. The Mine is divided into blocks known as the Northern, Central and Southern Block which are all located on Taharoa C Block, as well as the Eastern Blocks and the Te Mania Extension which are located on adjoining land.
3. TIL needs to replace its resource consents relating to the Central and Southern Blocks to continue operating the existing Mine and to enable expansion of the Mine in the future. TIL sought to do so by making an application in 2020 under the standard resource consenting process under the Resource Management Act 1991 (**RMA**). The consenting process under the RMA was lengthy and TIL was not satisfied with the decision, which led it to appeal the decision to the Environment Court on 12 December 2024.
4. Since the appeal was filed, the Fast-track Approvals Act 2024 (**FTAA**) has been enacted. The FTAA establishes a fast-track approvals regime for projects of national and regional significance in New Zealand.
5. The reconsenting of the Central and Southern Blocks of the Mine has been recognised by the Government as having regional and national significance and has been directly referred to utilise the Fast-Track approval process. The FTAA therefore provides an alternative, and suitable, consenting pathway for the Central and Southern Blocks. TIL is also proposing to extend its operation into the Northern Block. New mining of the Northern Block has also been directly referred by the Government to utilise the Fast-track process on account of its regional and national significance.
6. We are now preparing our substantive applications for both projects which will be considered under the FTAA. We are intending to file both applications with the Environmental Protection Agency in June/July 2025. Enviser is managing the preparation of the applications on behalf of TIL with input from a range of technical consultants, including Grant Eccles (planner) of Tonkin & Taylor Limited. Tonkin & Taylor has provided a high-level summary of what will be sought in each application in **Appendix A**.
7. We are writing to provide you with an opportunity to discuss the applications while they are being prepared. We are otherwise open to receiving written feedback if you do not wish to meet.
8. We are looking to arrange a meeting to discuss the applications as soon as possible. Otherwise, we would appreciate that any written feedback is provided by 11 July 2025.

9. If you would like to provide written feedback, please let us know using the following email address: [REDACTED]

Yours faithfully



Wayne Coffey
Managing Director and CEO of Taharoa Ironsands Limited

Appendix A

Taharoa Ironsands Mine – Project summary for pre-application consultation

- **Northern Block Mining Project**
- **Central and Southern Block Mining Project**

1 Overview

Taharoa Ironsands Limited (TIL) operate an iron sand mine at Taharoa, on the West Coast of the North Island, approximately 8 km south of Kawhia Harbour. The Taharoa Mine has been in operation since 1973 (owned by New Zealand Steel until 2017). The mine site covers an area of approximately 1,300 hectares, primarily on Māori land legally described as the Taharoa C Block and the part of the coastal marine area (CMA) legally defined as Port Taharoa (**mine**).

For the purposes of mining activity, Taharoa C Block is divided into blocks. As shown on the attached plan:

- (a) the area of the site to the north of the Mitiwai Stream is known as the Northern Block.
- (b) the area of the site between the Mitiwai Stream and the Wainui Stream is known as the Central Block; and
- (c) the area of the site to the south of the Wainui Stream is known as the Southern Block.

The Central and Southern Blocks are currently operated under a suite of resource consents granted in 2006.¹ Mining activity has not historically occurred in the Northern Block.

TIL is now preparing applications for the necessary resource consents, wildlife permits and archaeological authorities under the Fast-track Approvals Act 2024 (FTAA) to authorise:

- the extraction of sand (and associated activities) on the Northern Block (known as the Northern Block Mining Project); and
- the continuation of sand extraction (and associated activities which support the entire mine, including its export operation) on the Central and Southern Blocks and in the CMA (known as the Central and Southern Block Mining Project).

The following describes the proposed mining and associated works which are subject to the applications, details the resource consents and approvals sought and provides a high-level summary of the potential effects on the environment of each project at this stage. As the applications are currently being prepared, this information is based on the work completed as of 01 May 2025, and is subject to change.

¹ TIL also hold separate resource consents for mining of (i) the “Eastern Block” granted in 2018 (mining now completed and rehabilitation underway), and (ii) the “Te Mania Extension” adjoining the Eastern Block granted in 2022 (mining yet to commence), and (iii) a small area in the Northern Block known as “Pit 1” granted in late 2024 (mining currently in progress). Mining at these locations relies on the water take resource consents and the coastal permits granted for the Central and Southern Blocks.

2 Description of proposed works

TIL propose to mine ironsand throughout the Northern, Central and Southern Blocks excluding areas where mining restrictions will apply. The areas where mining activity will not take place are within 100 m of Mean High Water Springs, 30 m of perennial water bodies (Mitiwai Stream, Wainui Stream and Lake Taharoa), and within already identified urupa and archaeological re-interment areas on the mine. Other mining exclusion areas may be identified as part of the completion of technical assessments that are currently underway. Any additional mining exclusion areas that are identified by the technical assessments will be included in the substantive FTAA applications.

Whilst the process to extract, process and export the ironsand can and does vary depending on the nature of the deposit being mined at the time, it follows the same broad steps. These activities, which are sought to be authorised as part of the Central and Southern Block Project, include:

1. **Vegetation, topsoil and overburden removal, including harvesting of trees with commercial value (pines).** Useful native species are removed prior to stripping of topsoil for use in the eco-sourced nursery on site. Topsoil is stockpiled on-site for use in future rehabilitation activities.
2. **Extraction and processing of Ironsand.** Raw Ironsand is extracted using various methods and equipment depending on ground conditions. In upper layers, standard earthmoving machinery such as excavators, bulldozers, and trucks are used to collect the ironsand and deposit it into a Dry Mining Unit (DMU). The DMU mixes the ironsand with water to form a slurry, which is then pumped to a treatment plant for titanomagnetite extraction.
3. During this process, groundwater and surface water may enter the active excavation area. To maintain dry working conditions, this water may be pumped out as required. However, as mining progresses to deeper layers, maintaining a dry pit may become impractical. In such cases, a cutter-suction dredge is used in a water-filled pond. The dredge floats on the water and uses a submerged dredge head to cut, fluidise, and pump the Ironsand slurry through a pipeline to the treatment plant. The dredge is capable of operating at depths of 8 to 15 meters below the pond surface. In some instances, a long-reach excavator may also be used to extract material from within the pond.
4. **Processing.** The extracted ironsand is transported to a centralised processing plant where it is concentrated and processed. The ironsand is refined using screening and gravity separation. The ironsand is mixed into a slurry and pumped through a seabed pipeline to a bulk carrier ship moored at the Port of Taharoa. The export pipelines run from the processing and storage facility located on land to a Single Buoy Mooring (SBM), located approximately 3.5 km offshore.
5. **Ship loading and dewatering.** Bulk carrier ships moor at the SBM to receive the ironsand in slurry form from the export pipelines. Each ship contains dewatering equipment and the resulting freshwater, containing residual fine suspended material (inert, inorganic geological material) that is removed from the ironsand slurry, is discharged from the ship to the sea. The discharge forms a buoyant plume that floats on the seawater surface before dispersal and dilution. Ship loading operations are currently undertaken approximately 20 times per year and will increase in frequency in future as production increases up to a projected maximum of 35 times per year. Each ship loading activity takes approximately 90 hours (of pumping time) however weather conditions have an influence on loading timeframes.

6. **Tailings disposal and rehabilitation of mined areas.** The tailings (ferrous and non-ferrous sand, silts and clays) which are separated from the exportable product are pumped as a slurry to tailings disposal areas. The discharged slurry dewateres by gravity, with the drainage water collected and directed into a settlement pond or ponds. Once the tailings have dewatered, mechanical plant (excavators and dozers) redistribute the material to form the grade and levels required by the rehabilitation plan for that area. Following this the land may be stabilised, top soiled and replanted.

To operate the mine, the process requires the abstraction of water from the Wainui Stream via a constructed dam incorporating a fish pass, and the discharge of stormwater to the Wainui Stream and the discharge of process water to settling ponds. Excess stormwater and process water is discharged to the CMA via the ship loading pipelines.

The activities sought to be authorised as part of the Northern Block Mining Project include (but are not limited to):

- (a) vegetation, topsoil and overburden removal, and excavation and processing of iron sand above and below the water table (as above);
- (b) the transportation of that product via temporary pipelines to the established processing plant on the Central and Southern Block;
- (c) processing (as above);
- (d) discharge of process water to land; and
- (e) tailing disposal and rehabilitation of mined areas (as above).

The Northern Block Mining Project will rely on / be supported by the processing infrastructure located on the Central and Southern Blocks. It will also rely on / be supported by the consents being sought for the Central and Southern Block to take and use water from the Wainui Stream, discharge of stormwater to the Wainui Stream and the CMA, discharge of process water to the CMA and transport of processed product from the processing facility through the ship-loading pipelines to the CMA. No changes are being proposed to the existing water take limits and discharge limits to facilitate mining of the Northern Block.

3 Approvals sought

3.1 Resource Management Act 1991

A summary of the resource consents that are required for the Northern, Central and Southern Blocks is set out below.

3.1.1 Resource consents required for the Northern Block

National Environmental Standard for Freshwater 2020 – consents to clear vegetation and undertake earthworks within and within 10m of a natural inland wetland. Consents are also required to take, use, dam, or divert water within and within 100 m of a natural inland wetland and to discharge water within and within 100 m of a natural inland wetland.

National Environmental Standard for Commercial Forestry 2017 – consent to harvest pine trees within Class 8e land.

Operative Waikato Regional Plan – consents for soil disturbance and vegetation clearance activities, diversion and taking of groundwater and surface of water associated with mining above and below the water table, discharge of a contaminant to land or water (process water and placement of tailings) and for overburden disposal to land.

Additionally, resource consent is required under the Operative Waitomo District Plan for the potential disturbance of archaeological sites recorded in the Plan - this consent applies to the Northern Block only given that mining has occurred since the early 1970's on the Central and Southern Blocks.

3.1.2 Resource consents required for the Central and Southern Blocks

The resource consents set out above are also required for the Central and Southern Blocks.² In addition, the following resource consents are required for the Central and Southern Blocks Project:

Operative Waikato Regional Plan – consents for the damming, diversion and taking of surface water and groundwater, for stream bed disturbance, and for the discharge of stormwater to surface water.

Operative and Proposed Waikato Regional Coastal Plans – consents for the use and occupation of the Coastal Marine Area by the export pipelines and the SBM, for discharges to and depositions in the CMA from shiploading activities, and for the discharge of stormwater from the export pipelines.

3.2 Wildlife Act 1953

A wildlife permit will be required to manage lizards if they are identified prior to vegetation removal or ground disturbance works.

3.3 Heritage New Zealand Pouhere Taonga Act 2014

Archaeological authorities will be sought due to the potential for currently undiscovered archaeological features to be disturbed by mining activities (excluding urupa and archaeological areas reserved from mining which will not be disturbed).

4 Benefits of the Projects

The continuation of the mining activity on the Taharoa C Block that will be facilitated by the approvals sought under the FTAA will generate significant regional and national benefits. The Central and Southern Block Mining Project and Northern Block Project will directly contribute billions to the New Zealand economy (through employment, income for landowners, business for regional supplies and the payment of taxes).

The mine provides significant employment opportunities for the community, particularly local Māori. Over 82% of income earned by local Ngāti Mahuta comes from employment at the mine. TIL has a core workforce of 170-80 people but employs upwards of 300 staff and contractors.

TIL relies on locally sourced goods and services including the supply of electricity and services from surrounding areas including Kawhia, Te Kuiti, Otorohanga, Te Awamutu and Hamilton. TIL also relies on specialist sub-contractor support including the maintenance and management of specialised mine machinery and equipment. The support TIL relies on (and will continue to rely on) from

² Excluding the resource consent required for archaeological site disturbance.

surrounding centres for the Northern Block Project and Central and Southern Block Mining Project will inject billions into the local economy over the life of the consents sought for the Project.

The mine also provides essential benefits to the local Taharoa Village which was established around the mine and exists today because of the substantial financial contribution the mine makes every year.

5 Summary of potential adverse effects on the environment

The following high-level summary of effects on the environment is based on technical assessments previously completed in relation to mining of the Central and Southern blocks. These assessments are currently being updated, and additional assessments are being completed for mining of the Northern Block. A full assessment of effects supported by technical assessments will be included in the applications for the Northern and Central/Southern Blocks respectively.

5.1 Effects common to the Northern, Central and Southern Blocks

5.1.1 Effects on terrestrial ecology (including bats, birds, lizards)

Disturbance from mining activities has the potential to have adverse effects on wetland and grassland bird species. The loss of existing grassland due to the mining activity may also result in potential injury or death of various threatened native skink present in low numbers in the grassland. The overall level of effect on terrestrial ecology has been assessed as being **low** with the provision of an over-arching Environmental Management Plan (EMP), including an Avifauna Management Plan, Bat Management Plan and a Lizard Management Plan, and imposition of appropriate conditions such as a requirement for there to be a 30 m planting buffer around all natural water bodies. Subject to the imposition of conditions, the overall level of effects on terrestrial ecology has been assessed as **minor**.

5.1.2 Effects of mining below the water table

When mining activity interacts with groundwater there may be the potential for adverse effects on surface freshwater bodies if there is a hydraulic connection between the groundwater and surface water. This connection will be carefully monitored. Any adverse effects on the primary freshwater bodies on the site (the Mitiwai Stream and the Wainui Stream) can be avoided and mitigated through consent conditions including for example, requirements to maintain a minimum flow within the streams.

5.1.3 Effects of discharge to land

The discharge of tailings and surplus process water to land has the potential to cause adverse effects on landform, groundwater and nearby waterways. The tailings material is re-formed as close as practicable to the original landform. The discharge of surplus process water does not result in contamination of groundwater due to the natural filtering provided by the sandy ground conditions. Overall, the adverse effects of discharges to land have been assessed as **less than minor**.

5.1.4 Land disturbance effects

The mining operation is located in a high-risk erosion area and the mining and stockpiling of iron sand has the potential to result in adverse effects on land stability. Given that the mine has a good operational history with no erosion issues requiring mitigation, a rehabilitation process and

revegetation plan is followed for disturbed areas, and perennial waterbody mining setbacks are imposed, any adverse effects can be considered **negligible**.

5.1.5 Archaeological effects

Taharoa C Block is and has always been Māori land which means that there is elevated potential for accidental discovery of koi iwi and other taonga in the dune environment of the area. Ngāti Mahuta derived tikanga and protocols apply when discoveries of koiwi and taonga occur in the Taharoa dune environment as a result of mining activity, and that tikanga/protocol is reflected in existing and proposed consent conditions. Defined urupā are located within the dune system where accidentally discovered koiwi are interred with appropriate tikanga being observed. A buffer in which no mining occurs is observed around each urupā.

All of these measures and practices will continue and mitigate the potential adverse effects in relation to archaeology to **less than minor** levels.

5.1.6 Cultural effects

In considering cultural effects, it is important to note the cultural benefits the ongoing operation of the mine has for Ngati Mahuta as tangata whenua. These benefits include employment benefits, royalties, and support for the local community. Ngati Mahuta, though the Taharoa C Block Incorporation, own the land on which the mine operates and is paid significant royalties from the mine. The mine also supports the employment and growth of Ngati Mahuta whanau. The local employment opportunity generated by the mine has allowed the local community to retain members of the community who may have otherwise moved away to seek employment elsewhere and lost their connection to the land.

TIL understand the views of the respective Taharoa Marae and Te Runanga in relation to the potential cultural effects of the Central and Southern Block Project. In summary, at a high-level:

The damming of the Wainui Stream has the potential to have adverse effects on the health of Lake Taharoa and its indigenous fishery, an important matter to Ngāti Mahuta. The maintenance of the effectiveness of the fish pass at the dam in the Wainui Stream is important to ensure the presence of indigenous fish species in the stream and lake upstream of the dam continues.

The maintenance and monitoring of baseflow in the Mitiwai Stream is also an important matter from a cultural perspective. TIL has engaged expert consultants to monitor the stream to ensure that TIL understands the potential effects of its mining activity on the Stream, which will be managed through consent conditions. Rehabilitation of the mine site to a sustainable landform and land cover is also an important matter to Ngāti Mahuta. Representatives of Ngāti Mahuta have shared their desire for the land to be returned to its natural state following mining activity (being rolling sand dunes with some pockets of vegetation). In that regard, TIL has developed and is implementing an overall Site Rehabilitation Plan and updated Conceptual Site Closure Plan in place to be implemented in the event that the mine closes in the future.

TIL propose to consult with the respective Taharoa Marae and Te Runanga in the preparation of the various management plans that govern the management of effects at the mine. Such consultation and engagement benefits both parties – TIL will gain the benefit of access to the skills and expertise that reside within the marae and hapu whanau, while marae and hapu whanau will have the opportunity to influence the content of management plans that will play an important part in managing the ongoing effects of the mining activity. TIL will also propose the provision of a website

which includes monthly monitoring records to communicate data to mana whenua and the community.

5.1.7 Air Quality Effects

The mine is located in an isolated location subject to extreme westerly winds. In this environment, there is potential for wind-blown sand from the mine site to generate adverse effects on adjoining and adjacent sites to the mine, including in Taharoa Village. TIL implement a range of avoidance and mitigation techniques to control such emissions including the erection of fencing to trap sand particles, placing ground cover (for example, coconut matting) on exposed areas, using mobile and automated fixed watering systems on internal site roads, enforcing vehicle speed limits, and progressively rehabilitating mined out areas. These measures mean that the mine site can operate in accordance with the relevant permitted activity rule of the Waikato Regional Plan with regards to air quality. TIL proposes to implement a Dust Management Plan to manage the implementation of these dust prevention mechanisms. Although there remains the potential for off-site discharges of dust due to the coastal environment, these discharges are highly unlikely to result in adverse effects to human health. Acoustic Effects

The mining activities have the potential to have adverse noise effects on key sensitive receptors on sites adjoining the Northern Block (1891 Taharoa Road, 1891A Taharoa Road, Te Kōraha Marae and 25 Rotopuhoe Road). However, these receptors are located several hundred metres from where mining will occur on the Northern Block and given this separation distance, it is expected that the works will be able to be managed to comply with the Waitomo District Plan daytime and nighttime noise limits. As a result, any potential adverse effects from noise from mining on the Northern Block on sensitive receivers is expected to be **less than minor**.

Mining on the Central and Southern Blocks has been continuous since the 1970s and benefits from existing use rights with respect to noise levels and associated acoustic effects. Notwithstanding this, noise levels are expected to be compliant with District Plan noise limits. TIL will continue to adopt the best practicable option to ensure that the emission of noise from these blocks does not exceed a reasonable level for any nearby sensitive receptors.

5.2 Effects relating to the Central and Southern Blocks only

5.2.1 Effects of damming Wainui Stream

Authorisation of the dam in the Wainui Stream will result in a similar water regime to what is currently present. Fish passage will be provided for via the monitoring and maintenance of a fish pass which achieves the intended purpose of allowing grey mullet and other targeted species to be able to navigate upstream to Lake Taharoa. The downstream migration of juvenile native fish can be adequately addressed through consent conditions which include the retention of a minimum flow within the fish pass and downstream of the dam, as well as monitoring of fish pass performance. As a result, the effects of the dam on fish passage has been assessed as **negligible**.

5.2.2 Effects on water quantity

Water is extracted from the impounded section of the Wainui Stream for mining and shiploading processes. Separate water take consents are held for the mining and shiploading takes and the consents cannot be exercised at the same time. The mine is currently operating within the historically consented limits for water abstraction and no further water quantity is required for the continued operation of the mine. The Wainui Stream catchment is not over-allocated and there are

no permits held by any other party to take water from the stream. As a result, adverse water quantity effects are avoided.

5.2.3 Effects of water take on marginal wetlands

The proposed water takes have the potential to have adverse effects on marginal wetlands around the edges of Lake Taharoa. Noting that the wetlands have acclimated to the lake levels that have been experienced since the installation of the dam in the Wainui Stream in the early 1970's, the magnitude of these effects has been assessed as **low** given that the water takes will be operated in a similar manner to what has been historically occurred at the mine. Importantly, TIL is proposing to retain existing conditions that require water takes to cease if the lake levels reach a certain minimum point. Conditions will also be proposed that require ongoing monitoring of the lake margin wetlands and management responses to be implemented if the lake level remains low for an extended period and the wetlands show signs of stress (other than that caused by natural seasonal conditions).

5.2.4 Effects on benthic fauna

The proposed ship-loading infrastructure including pipelines on the seabed and the tethering mechanism for the SBM will continue to occupy part of the seabed and impact on a small amount of available subtidal sandflat habitat. Given the small percentage of the available subtidal sandflat habitat this represents, this is assessed as having a low magnitude of effect on benthic ecology. The effects of constructing the pipeline have also been assessed as being **low**.

5.2.5 Effects on fish and seafood species

The discharge from the ship loading process has the potential to have adverse effects on existing habitat for fish and seafood species. Given the relatively infrequent and short-term nature of the discharge and the highly mobile nature of fish species the potential adverse effects are assessed as **negligible**. The presence of green lipped mussels in the area of the discharge indicates that ongoing ship loading discharges do not inhibit mussel colonisation and has a **negligible** effect on seafood resource species.

5.2.6 Effects on marine mammals

A number of marine mammal species can be present in the wider marine area around Port Taharoa such as Māui dolphins, common dolphins, southern right whales and Orca/killer whales. Given the low level of risk posed by the ship loading operation and the fact that it has been occurring in the vicinity since the early 1970's, the overall risk of adverse effects for marine mammals is assessed as **negligible**. Nevertheless, to recognise the sensitivity of the marine mammals that traverse the area, TIL propose conditions that require an underwater noise survey to be undertaken if 35 ship visits occur in a 12 month period, in order to inform best practice underwater noise measures.

5.2.7 Effects on coastal processes

TIL seeks to continue the ability to discharge up to 75,000m³ per day of ship loading water, including freshwater and fine sediment, up to a maximum of 7,500,000m³ per year. As a result of dilution and dispersion of the sediment plume provided by oceanic conditions, the effect of this discharge on coastal processes has been assessed as being **less than minor**.

5.2.8 Effects of discharges in the Coastal Marine Area (CMA)

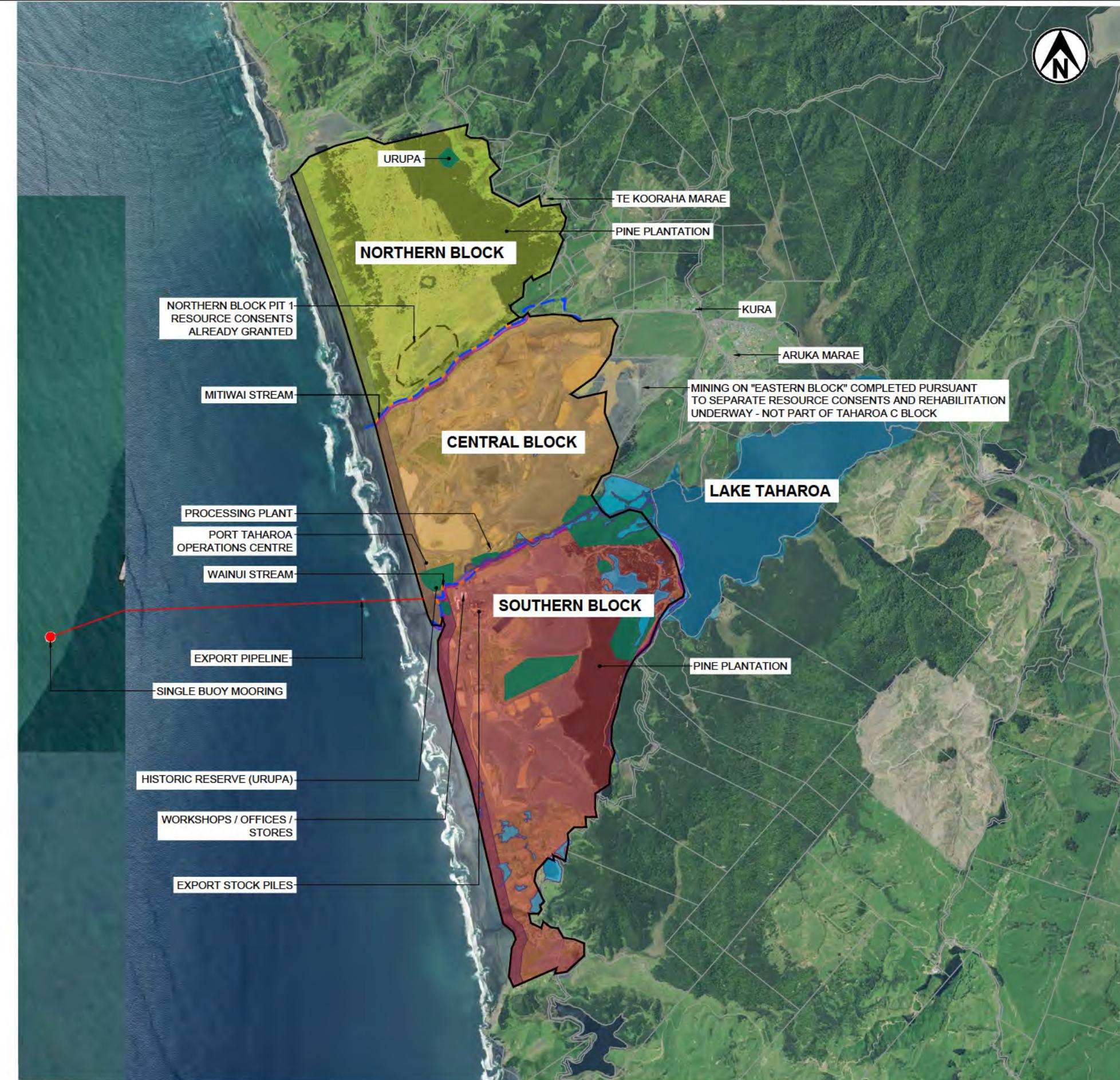
The potential adverse effects of the sediment discharge from the ship-loading events have been addressed above. The discharge includes some trace levels of naturally occurring contaminants in the ironsand that is pumped in slurry form into the ship. Because of the extremely low levels of the naturally occurring contaminants, and the dilution provided by the sea water, the discharge will not result in any measurable toxicity effect on benthic fauna.

TIL is seeking consent to continue to discharge excess process water and stormwater to the CMA at a rate of 32,000m³/day. This discharge occurs infrequently and when there is no suitable alternative to provide for the discharge on land - primarily at times of prolonged heavy rainfall. The potential ecological effects from the process water/stormwater discharge are likely to be even less than those of the ship loading discharge which were assessed to be less than minor. Correspondingly, no further actions to avoid, remedy or mitigate potential effects from the process wastewater and stormwater discharges are required apart from monitoring of the discharge quality and composition.

5.2.9 Effects on navigation safety

The continued ship movements to and from the Port of Taharoa and the occupation of the CMA by ship loading infrastructure have the potential to have adverse effects on navigational safety of other users of the CMA. However, the use of this area for recreational watercraft and commercial vessels is infrequent and the movement of ironsand export ships has been established in the area since the early 1970's. No more than one ship can access the mooring buoy at one time. Furthermore, the Port of Taharoa is operated in compliance with the New Zealand Port and Harbour Marine Safety Code, the Harbourmaster previously had no objection to the continued activity and several improvements have been implemented since the granting of the now expired resource consents in 2002. For these reasons, potential adverse effects on navigation safety have been assessed as **less than minor**.

LEGEND	
	STREAM
	PROPERTY BOUNDARIES
	MINING LICENCE AREA (TAHAROA C BLOCK)
	NORTHERN BLOCK
	CENTRAL BLOCK
	SOUTHERN BLOCK
	30m PERENNIAL WATER BODY / STREAM SETBACK
	100m MHWS SETBACK SUBJECT TO SURVEY
	ARCHEOLOGICAL AREAS RESERVED FROM MINING
	WETLAND



From: Harach, Olivia OH [REDACTED]
Sent: Wednesday, 25 June 2025 2:25 pm
To: Holly-Marie Rearic; Stephanie de Groot
Subject: FW: Invitation to Araruka Marae to meet or provide written feedback – Taharoa Ironsands Limited Fast-track Applications
Attachments: Consultation letter to Aaruka Marae dated 24 June 2025.pdf
Categories: Important



Olivia Harach
Taharoa Ironsands Ltd
P [REDACTED]
E [REDACTED]

From: Harach, Olivia OH
Sent: Wednesday, 25 June 2025 2:17 pm
To: [REDACTED]
Cc: Coffey, Wayne WC <[REDACTED]>
Subject: Invitation to Araruka Marae to meet or provide written feedback – Taharoa Ironsands Limited Fast-track Applications

Good afternoon Delwyn,

Please see the **attached** letter in relation to applications that TIL is preparing for the Central and Southern Block Project and Northern Block Project under the Fast-track Approvals Act 2024.

The purpose of the letter is to offer representatives of the Araruka Marae an opportunity to discuss the applications with TIL and/or for you to provide your written feedback on the applications.

Due to an administrative error, the attached letter was not sent when we originally intended to send it a few weeks ago.

Please let me know if you have any queries.

Regards
Wayne



Taharoa Ironsands Ltd

24 June 2025

BY EMAIL: [REDACTED]

Aaruka Marae
C/- Delwyn Hepi
20 Aaruka Marae Road
Taharoa 3998

Dear Delwyn

Taharoa Ironsands Limited – Fast-track Approvals Act 2024 applications

1. As you know, Taharoa Ironsands Limited (**TIL**) owns and operates the Taharoa Ironsand Mine which has been in operation since 1973.
2. The Mine is divided into blocks known as the Northern, Central and Southern Block which are all located on Taharoa C Block, as well as the Eastern Blocks and the Te Mania Extension which are located on adjoining land.
3. TIL needs to replace its resource consents relating to the Central and Southern Blocks to continue operating the existing Mine and to enable expansion of the Mine in the future. TIL sought to do so by making an application in 2020 under the standard resource consenting process under the Resource Management Act 1991 (**RMA**). The consenting process under the RMA was lengthy and TIL was not satisfied with the decision, which led it to appeal the decision to the Environment Court on 12 December 2024.
4. Since the appeal was filed, the Fast-track Approvals Act 2024 (**FTAA**) has been enacted. The FTAA establishes a fast-track approvals regime for projects of national and regional significance in New Zealand.
5. The reconsenting of the Central and Southern Blocks of the Mine has been recognised by the Government as having regional and national significance and has been directly referred to utilise the Fast-Track approval process. The FTAA therefore provides an alternative, and suitable, consenting pathway for the Central and Southern Blocks. TIL is also proposing to extend its operation into the Northern Block. New mining of the Northern Block has also been directly referred by the Government to utilise the Fast-track process on account of its regional and national significance.
6. We are now preparing our substantive applications for both projects which will be considered under the FTAA. We are intending to file both applications with the Environmental Protection Agency in June/July 2025. Enviser is managing the preparation of the applications on behalf of TIL with input from a range of technical consultants, including Grant Eccles (planner) of Tonkin & Taylor Limited. Tonkin & Taylor has provided a high-level summary of what will be sought in each application in **Appendix A**.
7. We have previously engaged with representatives of the Marae in respect of our application under the RMA for the Central and Southern Blocks, and you participated in the hearing of that application. TIL has an understanding of your view in respect of the Mine and the consenting of the Central and Southern Blocks from that process. However, we are writing to provide you with an opportunity to engage with us further and to discuss the FTAA applications, or otherwise provide written feedback, while they are being prepared.

8. We are writing to provide you with an opportunity to discuss the applications while they are being prepared. We are otherwise open to receiving written feedback if you do not wish to meet.
9. We are looking to arrange a meeting to discuss the applications as soon as possible. Otherwise, we would appreciate that any written feedback is provided by 11 July 2025.
10. If you would like to provide written feedback, please let us know using the following email address: [REDACTED]
11. If you have any queries, please let us know.

Yours faithfully



Wayne Coffey
Managing Director and CEO of Taharoa Ironsands Limited

Appendix A

Taharoa Ironsands Mine – Project summary for pre-application consultation

- **Northern Block Mining Project**
- **Central and Southern Block Mining Project**

1 Overview

Taharoa Ironsands Limited (TIL) operate an iron sand mine at Taharoa, on the West Coast of the North Island, approximately 8 km south of Kawhia Harbour. The Taharoa Mine has been in operation since 1973 (owned by New Zealand Steel until 2017). The mine site covers an area of approximately 1,300 hectares, primarily on Māori land legally described as the Taharoa C Block and the part of the coastal marine area (CMA) legally defined as Port Taharoa (**mine**).

For the purposes of mining activity, Taharoa C Block is divided into blocks. As shown on the attached plan:

- (a) the area of the site to the north of the Mitiwai Stream is known as the Northern Block.
- (b) the area of the site between the Mitiwai Stream and the Wainui Stream is known as the Central Block; and
- (c) the area of the site to the south of the Wainui Stream is known as the Southern Block.

The Central and Southern Blocks are currently operated under a suite of resource consents granted in 2006.¹ Mining activity has not historically occurred in the Northern Block.

TIL is now preparing applications for the necessary resource consents, wildlife permits and archaeological authorities under the Fast-track Approvals Act 2024 (FTAA) to authorise:

- the extraction of sand (and associated activities) on the Northern Block (known as the Northern Block Mining Project); and
- the continuation of sand extraction (and associated activities which support the entire mine, including its export operation) on the Central and Southern Blocks and in the CMA (known as the Central and Southern Block Mining Project).

The following describes the proposed mining and associated works which are subject to the applications, details the resource consents and approvals sought and provides a high-level summary of the potential effects on the environment of each project at this stage. As the applications are currently being prepared, this information is based on the work completed as of 01 May 2025, and is subject to change.

¹ TIL also hold separate resource consents for mining of (i) the “Eastern Block” granted in 2018 (mining now completed and rehabilitation underway), and (ii) the “Te Mania Extension” adjoining the Eastern Block granted in 2022 (mining yet to commence), and (iii) a small area in the Northern Block known as “Pit 1” granted in late 2024 (mining currently in progress). Mining at these locations relies on the water take resource consents and the coastal permits granted for the Central and Southern Blocks.

2 Description of proposed works

TIL propose to mine ironsand throughout the Northern, Central and Southern Blocks excluding areas where mining restrictions will apply. The areas where mining activity will not take place are within 100 m of Mean High Water Springs, 30 m of perennial water bodies (Mitiwai Stream, Wainui Stream and Lake Taharoa), and within already identified urupa and archaeological re-interment areas on the mine. Other mining exclusion areas may be identified as part of the completion of technical assessments that are currently underway. Any additional mining exclusion areas that are identified by the technical assessments will be included in the substantive FTAA applications.

Whilst the process to extract, process and export the ironsand can and does vary depending on the nature of the deposit being mined at the time, it follows the same broad steps. These activities, which are sought to be authorised as part of the Central and Southern Block Project, include:

1. **Vegetation, topsoil and overburden removal, including harvesting of trees with commercial value (pines).** Useful native species are removed prior to stripping of topsoil for use in the eco-sourced nursery on site. Topsoil is stockpiled on-site for use in future rehabilitation activities.
2. **Extraction and processing of Ironsand.** Raw Ironsand is extracted using various methods and equipment depending on ground conditions. In upper layers, standard earthmoving machinery such as excavators, bulldozers, and trucks are used to collect the ironsand and deposit it into a Dry Mining Unit (DMU). The DMU mixes the ironsand with water to form a slurry, which is then pumped to a treatment plant for titanomagnetite extraction.
3. During this process, groundwater and surface water may enter the active excavation area. To maintain dry working conditions, this water may be pumped out as required. However, as mining progresses to deeper layers, maintaining a dry pit may become impractical. In such cases, a cutter-suction dredge is used in a water-filled pond. The dredge floats on the water and uses a submerged dredge head to cut, fluidise, and pump the Ironsand slurry through a pipeline to the treatment plant. The dredge is capable of operating at depths of 8 to 15 meters below the pond surface. In some instances, a long-reach excavator may also be used to extract material from within the pond.
4. **Processing.** The extracted ironsand is transported to a centralised processing plant where it is concentrated and processed. The ironsand is refined using screening and gravity separation. The ironsand is mixed into a slurry and pumped through a seabed pipeline to a bulk carrier ship moored at the Port of Taharoa. The export pipelines run from the processing and storage facility located on land to a Single Buoy Mooring (SBM), located approximately 3.5 km offshore.
5. **Ship loading and dewatering.** Bulk carrier ships moor at the SBM to receive the ironsand in slurry form from the export pipelines. Each ship contains dewatering equipment and the resulting freshwater, containing residual fine suspended material (inert, inorganic geological material) that is removed from the ironsand slurry, is discharged from the ship to the sea. The discharge forms a buoyant plume that floats on the seawater surface before dispersal and dilution. Ship loading operations are currently undertaken approximately 20 times per year and will increase in frequency in future as production increases up to a projected maximum of 35 times per year. Each ship loading activity takes approximately 90 hours (of pumping time) however weather conditions have an influence on loading timeframes.

6. **Tailings disposal and rehabilitation of mined areas.** The tailings (ferrous and non-ferrous sand, silts and clays) which are separated from the exportable product are pumped as a slurry to tailings disposal areas. The discharged slurry dewateres by gravity, with the drainage water collected and directed into a settlement pond or ponds. Once the tailings have dewatered, mechanical plant (excavators and dozers) redistribute the material to form the grade and levels required by the rehabilitation plan for that area. Following this the land may be stabilised, top soiled and replanted.

To operate the mine, the process requires the abstraction of water from the Wainui Stream via a constructed dam incorporating a fish pass, and the discharge of stormwater to the Wainui Stream and the discharge of process water to settling ponds. Excess stormwater and process water is discharged to the CMA via the ship loading pipelines.

The activities sought to be authorised as part of the Northern Block Mining Project include (but are not limited to):

- (a) vegetation, topsoil and overburden removal, and excavation and processing of iron sand above and below the water table (as above);
- (b) the transportation of that product via temporary pipelines to the established processing plant on the Central and Southern Block;
- (c) processing (as above);
- (d) discharge of process water to land; and
- (e) tailing disposal and rehabilitation of mined areas (as above).

The Northern Block Mining Project will rely on / be supported by the processing infrastructure located on the Central and Southern Blocks. It will also rely on / be supported by the consents being sought for the Central and Southern Block to take and use water from the Wainui Stream, discharge of stormwater to the Wainui Stream and the CMA, discharge of process water to the CMA and transport of processed product from the processing facility through the ship-loading pipelines to the CMA. No changes are being proposed to the existing water take limits and discharge limits to facilitate mining of the Northern Block.

3 Approvals sought

3.1 Resource Management Act 1991

A summary of the resource consents that are required for the Northern, Central and Southern Blocks is set out below.

3.1.1 Resource consents required for the Northern Block

National Environmental Standard for Freshwater 2020 – consents to clear vegetation and undertake earthworks within and within 10m of a natural inland wetland. Consents are also required to take, use, dam, or divert water within and within 100 m of a natural inland wetland and to discharge water within and within 100 m of a natural inland wetland.

National Environmental Standard for Commercial Forestry 2017 – consent to harvest pine trees within Class 8e land.

Operative Waikato Regional Plan – consents for soil disturbance and vegetation clearance activities, diversion and taking of groundwater and surface of water associated with mining above and below the water table, discharge of a contaminant to land or water (process water and placement of tailings) and for overburden disposal to land.

Additionally, resource consent is required under the Operative Waitomo District Plan for the potential disturbance of archaeological sites recorded in the Plan - this consent applies to the Northern Block only given that mining has occurred since the early 1970's on the Central and Southern Blocks.

3.1.2 Resource consents required for the Central and Southern Blocks

The resource consents set out above are also required for the Central and Southern Blocks.² In addition, the following resource consents are required for the Central and Southern Blocks Project:

Operative Waikato Regional Plan – consents for the damming, diversion and taking of surface water and groundwater, for stream bed disturbance, and for the discharge of stormwater to surface water.

Operative and Proposed Waikato Regional Coastal Plans – consents for the use and occupation of the Coastal Marine Area by the export pipelines and the SBM, for discharges to and depositions in the CMA from shiploading activities, and for the discharge of stormwater from the export pipelines.

3.2 Wildlife Act 1953

A wildlife permit will be required to manage lizards if they are identified prior to vegetation removal or ground disturbance works.

3.3 Heritage New Zealand Pouhere Taonga Act 2014

Archaeological authorities will be sought due to the potential for currently undiscovered archaeological features to be disturbed by mining activities (excluding urupa and archaeological areas reserved from mining which will not be disturbed).

4 Benefits of the Projects

The continuation of the mining activity on the Taharoa C Block that will be facilitated by the approvals sought under the FTAA will generate significant regional and national benefits. The Central and Southern Block Mining Project and Northern Block Project will directly contribute billions to the New Zealand economy (through employment, income for landowners, business for regional supplies and the payment of taxes).

The mine provides significant employment opportunities for the community, particularly local Māori. Over 82% of income earned by local Ngāti Mahuta comes from employment at the mine. TIL has a core workforce of 170-80 people but employs upwards of 300 staff and contractors.

TIL relies on locally sourced goods and services including the supply of electricity and services from surrounding areas including Kawhia, Te Kuiti, Otorohanga, Te Awamutu and Hamilton. TIL also relies on specialist sub-contractor support including the maintenance and management of specialised mine machinery and equipment. The support TIL relies on (and will continue to rely on) from

² Excluding the resource consent required for archaeological site disturbance.

surrounding centres for the Northern Block Project and Central and Southern Block Mining Project will inject billions into the local economy over the life of the consents sought for the Project.

The mine also provides essential benefits to the local Taharoa Village which was established around the mine and exists today because of the substantial financial contribution the mine makes every year.

5 Summary of potential adverse effects on the environment

The following high-level summary of effects on the environment is based on technical assessments previously completed in relation to mining of the Central and Southern blocks. These assessments are currently being updated, and additional assessments are being completed for mining of the Northern Block. A full assessment of effects supported by technical assessments will be included in the applications for the Northern and Central/Southern Blocks respectively.

5.1 Effects common to the Northern, Central and Southern Blocks

5.1.1 Effects on terrestrial ecology (including bats, birds, lizards)

Disturbance from mining activities has the potential to have adverse effects on wetland and grassland bird species. The loss of existing grassland due to the mining activity may also result in potential injury or death of various threatened native skink present in low numbers in the grassland. The overall level of effect on terrestrial ecology has been assessed as being **low** with the provision of an over-arching Environmental Management Plan (EMP), including an Avifauna Management Plan, Bat Management Plan and a Lizard Management Plan, and imposition of appropriate conditions such as a requirement for there to be a 30 m planting buffer around all natural water bodies. Subject to the imposition of conditions, the overall level of effects on terrestrial ecology has been assessed as **minor**.

5.1.2 Effects of mining below the water table

When mining activity interacts with groundwater there may be the potential for adverse effects on surface freshwater bodies if there is a hydraulic connection between the groundwater and surface water. This connection will be carefully monitored. Any adverse effects on the primary freshwater bodies on the site (the Mitiwai Stream and the Wainui Stream) can be avoided and mitigated through consent conditions including for example, requirements to maintain a minimum flow within the streams.

5.1.3 Effects of discharge to land

The discharge of tailings and surplus process water to land has the potential to cause adverse effects on landform, groundwater and nearby waterways. The tailings material is re-formed as close as practicable to the original landform. The discharge of surplus process water does not result in contamination of groundwater due to the natural filtering provided by the sandy ground conditions. Overall, the adverse effects of discharges to land have been assessed as **less than minor**.

5.1.4 Land disturbance effects

The mining operation is located in a high-risk erosion area and the mining and stockpiling of iron sand has the potential to result in adverse effects on land stability. Given that the mine has a good operational history with no erosion issues requiring mitigation, a rehabilitation process and

revegetation plan is followed for disturbed areas, and perennial waterbody mining setbacks are imposed, any adverse effects can be considered **negligible**.

5.1.5 Archaeological effects

Taharoa C Block is and has always been Māori land which means that there is elevated potential for accidental discovery of koi iwi and other taonga in the dune environment of the area. Ngāti Mahuta derived tikanga and protocols apply when discoveries of koiwi and taonga occur in the Taharoa dune environment as a result of mining activity, and that tikanga/protocol is reflected in existing and proposed consent conditions. Defined urupā are located within the dune system where accidentally discovered koiwi are interred with appropriate tikanga being observed. A buffer in which no mining occurs is observed around each urupā.

All of these measures and practices will continue and mitigate the potential adverse effects in relation to archaeology to **less than minor** levels.

5.1.6 Cultural effects

In considering cultural effects, it is important to note the cultural benefits the ongoing operation of the mine has for Ngati Mahuta as tangata whenua. These benefits include employment benefits, royalties, and support for the local community. Ngati Mahuta, though the Taharoa C Block Incorporation, own the land on which the mine operates and is paid significant royalties from the mine. The mine also supports the employment and growth of Ngati Mahuta whanau. The local employment opportunity generated by the mine has allowed the local community to retain members of the community who may have otherwise moved away to seek employment elsewhere and lost their connection to the land.

TIL understand the views of the respective Taharoa Marae and Te Runanga in relation to the potential cultural effects of the Central and Southern Block Project. In summary, at a high-level:

The damming of the Wainui Stream has the potential to have adverse effects on the health of Lake Taharoa and its indigenous fishery, an important matter to Ngāti Mahuta. The maintenance of the effectiveness of the fish pass at the dam in the Wainui Stream is important to ensure the presence of indigenous fish species in the stream and lake upstream of the dam continues.

The maintenance and monitoring of baseflow in the Mitiwai Stream is also an important matter from a cultural perspective. TIL has engaged expert consultants to monitor the stream to ensure that TIL understands the potential effects of its mining activity on the Stream, which will be managed through consent conditions. Rehabilitation of the mine site to a sustainable landform and land cover is also an important matter to Ngāti Mahuta. Representatives of Ngāti Mahuta have shared their desire for the land to be returned to its natural state following mining activity (being rolling sand dunes with some pockets of vegetation). In that regard, TIL has developed and is implementing an overall Site Rehabilitation Plan and updated Conceptual Site Closure Plan in place to be implemented in the event that the mine closes in the future.

TIL propose to consult with the respective Taharoa Marae and Te Runanga in the preparation of the various management plans that govern the management of effects at the mine. Such consultation and engagement benefits both parties – TIL will gain the benefit of access to the skills and expertise that reside within the marae and hapu whanau, while marae and hapu whanau will have the opportunity to influence the content of management plans that will play an important part in managing the ongoing effects of the mining activity. TIL will also propose the provision of a website

which includes monthly monitoring records to communicate data to mana whenua and the community.

5.1.7 Air Quality Effects

The mine is located in an isolated location subject to extreme westerly winds. In this environment, there is potential for wind-blown sand from the mine site to generate adverse effects on adjoining and adjacent sites to the mine, including in Taharoa Village. TIL implement a range of avoidance and mitigation techniques to control such emissions including the erection of fencing to trap sand particles, placing ground cover (for example, coconut matting) on exposed areas, using mobile and automated fixed watering systems on internal site roads, enforcing vehicle speed limits, and progressively rehabilitating mined out areas. These measures mean that the mine site can operate in accordance with the relevant permitted activity rule of the Waikato Regional Plan with regards to air quality. TIL proposes to implement a Dust Management Plan to manage the implementation of these dust prevention mechanisms. Although there remains the potential for off-site discharges of dust due to the coastal environment, these discharges are highly unlikely to result in adverse effects to human health. Acoustic Effects

The mining activities have the potential to have adverse noise effects on key sensitive receptors on sites adjoining the Northern Block (1891 Taharoa Road, 1891A Taharoa Road, Te Kōraha Marae and 25 Rotopuhoe Road). However, these receptors are located several hundred metres from where mining will occur on the Northern Block and given this separation distance, it is expected that the works will be able to be managed to comply with the Waitomo District Plan daytime and nighttime noise limits. As a result, any potential adverse effects from noise from mining on the Northern Block on sensitive receivers is expected to be **less than minor**.

Mining on the Central and Southern Blocks has been continuous since the 1970s and benefits from existing use rights with respect to noise levels and associated acoustic effects. Notwithstanding this, noise levels are expected to be compliant with District Plan noise limits. TIL will continue to adopt the best practicable option to ensure that the emission of noise from these blocks does not exceed a reasonable level for any nearby sensitive receptors.

5.2 Effects relating to the Central and Southern Blocks only

5.2.1 Effects of damming Wainui Stream

Authorisation of the dam in the Wainui Stream will result in a similar water regime to what is currently present. Fish passage will be provided for via the monitoring and maintenance of a fish pass which achieves the intended purpose of allowing grey mullet and other targeted species to be able to navigate upstream to Lake Taharoa. The downstream migration of juvenile native fish can be adequately addressed through consent conditions which include the retention of a minimum flow within the fish pass and downstream of the dam, as well as monitoring of fish pass performance. As a result, the effects of the dam on fish passage has been assessed as **negligible**.

5.2.2 Effects on water quantity

Water is extracted from the impounded section of the Wainui Stream for mining and shiploading processes. Separate water take consents are held for the mining and shiploading takes and the consents cannot be exercised at the same time. The mine is currently operating within the historically consented limits for water abstraction and no further water quantity is required for the continued operation of the mine. The Wainui Stream catchment is not over-allocated and there are

no permits held by any other party to take water from the stream. As a result, adverse water quantity effects are avoided.

5.2.3 Effects of water take on marginal wetlands

The proposed water takes have the potential to have adverse effects on marginal wetlands around the edges of Lake Taharoa. Noting that the wetlands have acclimated to the lake levels that have been experienced since the installation of the dam in the Wainui Stream in the early 1970's, the magnitude of these effects has been assessed as **low** given that the water takes will be operated in a similar manner to what has been historically occurred at the mine. Importantly, TIL is proposing to retain existing conditions that require water takes to cease if the lake levels reach a certain minimum point. Conditions will also be proposed that require ongoing monitoring of the lake margin wetlands and management responses to be implemented if the lake level remains low for an extended period and the wetlands show signs of stress (other than that caused by natural seasonal conditions).

5.2.4 Effects on benthic fauna

The proposed ship-loading infrastructure including pipelines on the seabed and the tethering mechanism for the SBM will continue to occupy part of the seabed and impact on a small amount of available subtidal sandflat habitat. Given the small percentage of the available subtidal sandflat habitat this represents, this is assessed as having a low magnitude of effect on benthic ecology. The effects of constructing the pipeline have also been assessed as being **low**.

5.2.5 Effects on fish and seafood species

The discharge from the ship loading process has the potential to have adverse effects on existing habitat for fish and seafood species. Given the relatively infrequent and short-term nature of the discharge and the highly mobile nature of fish species the potential adverse effects are assessed as **negligible**. The presence of green lipped mussels in the area of the discharge indicates that ongoing ship loading discharges do not inhibit mussel colonisation and has a **negligible** effect on seafood resource species.

5.2.6 Effects on marine mammals

A number of marine mammal species can be present in the wider marine area around Port Taharoa such as Māui dolphins, common dolphins, southern right whales and Orca/killer whales. Given the low level of risk posed by the ship loading operation and the fact that it has been occurring in the vicinity since the early 1970's, the overall risk of adverse effects for marine mammals is assessed as **negligible**. Nevertheless, to recognise the sensitivity of the marine mammals that traverse the area, TIL propose conditions that require an underwater noise survey to be undertaken if 35 ship visits occur in a 12 month period, in order to inform best practice underwater noise measures.

5.2.7 Effects on coastal processes

TIL seeks to continue the ability to discharge up to 75,000m³ per day of ship loading water, including freshwater and fine sediment, up to a maximum of 7,500,000m³ per year. As a result of dilution and dispersion of the sediment plume provided by oceanic conditions, the effect of this discharge on coastal processes has been assessed as being **less than minor**.

5.2.8 Effects of discharges in the Coastal Marine Area (CMA)

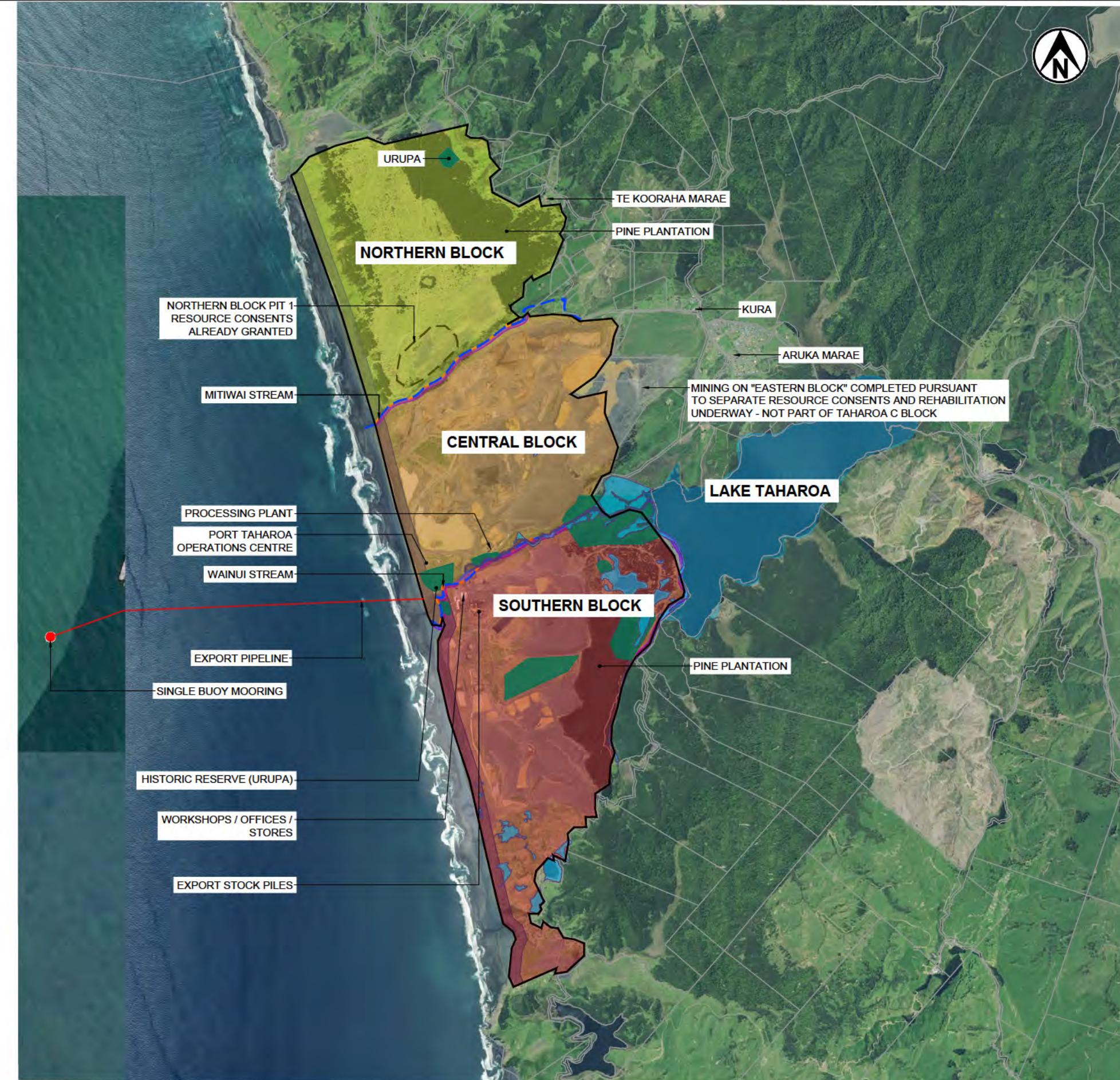
The potential adverse effects of the sediment discharge from the ship-loading events have been addressed above. The discharge includes some trace levels of naturally occurring contaminants in the ironsand that is pumped in slurry form into the ship. Because of the extremely low levels of the naturally occurring contaminants, and the dilution provided by the sea water, the discharge will not result in any measurable toxicity effect on benthic fauna.

TIL is seeking consent to continue to discharge excess process water and stormwater to the CMA at a rate of 32,000m³/day. This discharge occurs infrequently and when there is no suitable alternative to provide for the discharge on land - primarily at times of prolonged heavy rainfall. The potential ecological effects from the process water/stormwater discharge are likely to be even less than those of the ship loading discharge which were assessed to be less than minor. Correspondingly, no further actions to avoid, remedy or mitigate potential effects from the process wastewater and stormwater discharges are required apart from monitoring of the discharge quality and composition.

5.2.9 Effects on navigation safety

The continued ship movements to and from the Port of Taharoa and the occupation of the CMA by ship loading infrastructure have the potential to have adverse effects on navigational safety of other users of the CMA. However, the use of this area for recreational watercraft and commercial vessels is infrequent and the movement of ironsand export ships has been established in the area since the early 1970's. No more than one ship can access the mooring buoy at one time. Furthermore, the Port of Taharoa is operated in compliance with the New Zealand Port and Harbour Marine Safety Code, the Harbourmaster previously had no objection to the continued activity and several improvements have been implemented since the granting of the now expired resource consents in 2002. For these reasons, potential adverse effects on navigation safety have been assessed as **less than minor**.

LEGEND	
	STREAM
	PROPERTY BOUNDARIES
	MINING LICENCE AREA (TAHAROA C BLOCK)
	NORTHERN BLOCK
	CENTRAL BLOCK
	SOUTHERN BLOCK
	30m PERENNIAL WATER BODY / STREAM SETBACK
	100m MHWS SETBACK SUBJECT TO SURVEY
	ARCHEOLOGICAL AREAS RESERVED FROM MINING
	WETLAND



From: Harach, Olivia OH [REDACTED]
Sent: Wednesday, 25 June 2025 2:25 pm
To: Holly-Marie Rearic; Stephanie de Groot
Subject: FW: Invitation to Te Kooraha Marae to meet or provide written feedback – Taharoa Ironsands Limited Fast-track Applications
Attachments: Consultation letter to Te Kooraha Marae dated 24 June 2025.pdf

Categories: Important



Olivia Harach
Taharoa Ironsands Ltd
P [REDACTED]
E [REDACTED]

From: Harach, Olivia OH
Sent: Wednesday, 25 June 2025 2:14 pm
To: [REDACTED]
Cc: Coffey, Wayne WC <[REDACTED]>
Subject: Invitation to Te Kooraha Marae to meet or provide written feedback – Taharoa Ironsands Limited Fast-track Applications

Good afternoon Ngahuia and Taituwah

Please see the **attached** letter in relation to applications that TIL is preparing for the Central and Southern Block Project and Northern Block Project under the Fast-track Approvals Act 2024.

The purpose of the letter is to offer you the opportunity to discuss the applications with TIL, on behalf of Te Kooraha Marae and/or for you to provide your written feedback on the applications.

Due to an administrative error, the attached letter was not sent when we originally intended to send it a few weeks ago.

Please let me know if you have any queries.

Regards
Wayne



Taharoa Ironsands Ltd

24 June 2025

BY EMAIL: [REDACTED]

Te Kooraha Marae
C/- Ngahuia Herangi and Taituwha King
14 Evergreen Rise
Grandview Heights
Hamilton 3200

Dear Ngahuia and Taituwha

Taharoa Ironsands Limited – Fast-track Approvals Act 2024 applications

1. As you know, Taharoa Ironsands Limited (**TIL**) owns and operates the Taharoa Ironsand Mine which has been in operation since 1973.
2. The Mine is divided into blocks known as the Northern, Central and Southern Block which are all located on Taharoa C Block, as well as the Eastern Blocks and the Te Mania Extension which are located on adjoining land.
3. TIL needs to replace its resource consents relating to the Central and Southern Blocks to continue operating the existing Mine and to enable expansion of the Mine in the future. TIL sought to do so by making an application in 2020 under the standard resource consenting process under the Resource Management Act 1991 (**RMA**). The consenting process under the RMA was lengthy and TIL was not satisfied with the decision, which led it to appeal the decision to the Environment Court on 12 December 2024.
4. Since the appeal was filed, the Fast-track Approvals Act 2024 (**FTAA**) has been enacted. The FTAA establishes a fast-track approvals regime for projects of national and regional significance in New Zealand.
5. The reconsenting of the Central and Southern Blocks of the Mine has been recognised by the Government as having regional and national significance and has been directly referred to utilise the Fast-Track approval process. The FTAA therefore provides an alternative, and suitable, consenting pathway for the Central and Southern Blocks. TIL is also proposing to extend its operation into the Northern Block. New mining of the Northern Block has also been directly referred by the Government to utilise the Fast-track process on account of its regional and national significance.
6. We are now preparing our substantive applications for both projects which will be considered under the FTAA. We are intending to file both applications with the Environmental Protection Agency in June/July 2025. Enviser is managing the preparation of the applications on behalf of TIL with input from a range of technical consultants, including Grant Eccles (planner) of Tonkin & Taylor Limited. Tonkin & Taylor has provided a high-level summary of what will be sought in each application in **Appendix A**.
7. We have previously engaged with representatives of the Marae in respect of our application under the RMA for the Central and Southern Blocks, and you participated in the hearing of that application. TIL has an understanding of your view in respect of the Mine and the consenting of the Central and Southern Blocks from that process. However, we are writing to provide you with an opportunity to engage with us further and to discuss the FTAA applications, or otherwise provide written feedback, while they are being prepared.

8. We are writing to provide you with an opportunity to discuss the applications while they are being prepared. We are otherwise open to receiving written feedback if you do not wish to meet.
9. We are looking to arrange a meeting to discuss the applications as soon as possible. Otherwise, we would appreciate that any written feedback is provided by 11 July 2025.
10. If you would like to provide written feedback, please let us know using the following email address: [REDACTED]
11. If you have any queries, please let us know.

Yours faithfully



Wayne Coffey
Managing Director and CEO of Taharoa Ironsands Limited

Appendix A

Taharoa Ironsands Mine – Project summary for pre-application consultation

- **Northern Block Mining Project**
- **Central and Southern Block Mining Project**

1 Overview

Taharoa Ironsands Limited (TIL) operate an iron sand mine at Taharoa, on the West Coast of the North Island, approximately 8 km south of Kawhia Harbour. The Taharoa Mine has been in operation since 1973 (owned by New Zealand Steel until 2017). The mine site covers an area of approximately 1,300 hectares, primarily on Māori land legally described as the Taharoa C Block and the part of the coastal marine area (CMA) legally defined as Port Taharoa (**mine**).

For the purposes of mining activity, Taharoa C Block is divided into blocks. As shown on the attached plan:

- (a) the area of the site to the north of the Mitiwai Stream is known as the Northern Block.
- (b) the area of the site between the Mitiwai Stream and the Wainui Stream is known as the Central Block; and
- (c) the area of the site to the south of the Wainui Stream is known as the Southern Block.

The Central and Southern Blocks are currently operated under a suite of resource consents granted in 2006.¹ Mining activity has not historically occurred in the Northern Block.

TIL is now preparing applications for the necessary resource consents, wildlife permits and archaeological authorities under the Fast-track Approvals Act 2024 (FTAA) to authorise:

- the extraction of sand (and associated activities) on the Northern Block (known as the Northern Block Mining Project); and
- the continuation of sand extraction (and associated activities which support the entire mine, including its export operation) on the Central and Southern Blocks and in the CMA (known as the Central and Southern Block Mining Project).

The following describes the proposed mining and associated works which are subject to the applications, details the resource consents and approvals sought and provides a high-level summary of the potential effects on the environment of each project at this stage. As the applications are currently being prepared, this information is based on the work completed as of 01 May 2025, and is subject to change.

¹ TIL also hold separate resource consents for mining of (i) the “Eastern Block” granted in 2018 (mining now completed and rehabilitation underway), and (ii) the “Te Mania Extension” adjoining the Eastern Block granted in 2022 (mining yet to commence), and (iii) a small area in the Northern Block known as “Pit 1” granted in late 2024 (mining currently in progress). Mining at these locations relies on the water take resource consents and the coastal permits granted for the Central and Southern Blocks.

2 Description of proposed works

TIL propose to mine ironsand throughout the Northern, Central and Southern Blocks excluding areas where mining restrictions will apply. The areas where mining activity will not take place are within 100 m of Mean High Water Springs, 30 m of perennial water bodies (Mitiwai Stream, Wainui Stream and Lake Taharoa), and within already identified urupa and archaeological re-interment areas on the mine. Other mining exclusion areas may be identified as part of the completion of technical assessments that are currently underway. Any additional mining exclusion areas that are identified by the technical assessments will be included in the substantive FTAA applications.

Whilst the process to extract, process and export the ironsand can and does vary depending on the nature of the deposit being mined at the time, it follows the same broad steps. These activities, which are sought to be authorised as part of the Central and Southern Block Project, include:

1. **Vegetation, topsoil and overburden removal, including harvesting of trees with commercial value (pines).** Useful native species are removed prior to stripping of topsoil for use in the eco-sourced nursery on site. Topsoil is stockpiled on-site for use in future rehabilitation activities.
2. **Extraction and processing of Ironsand.** Raw Ironsand is extracted using various methods and equipment depending on ground conditions. In upper layers, standard earthmoving machinery such as excavators, bulldozers, and trucks are used to collect the ironsand and deposit it into a Dry Mining Unit (DMU). The DMU mixes the ironsand with water to form a slurry, which is then pumped to a treatment plant for titanomagnetite extraction.
3. During this process, groundwater and surface water may enter the active excavation area. To maintain dry working conditions, this water may be pumped out as required. However, as mining progresses to deeper layers, maintaining a dry pit may become impractical. In such cases, a cutter-suction dredge is used in a water-filled pond. The dredge floats on the water and uses a submerged dredge head to cut, fluidise, and pump the Ironsand slurry through a pipeline to the treatment plant. The dredge is capable of operating at depths of 8 to 15 meters below the pond surface. In some instances, a long-reach excavator may also be used to extract material from within the pond.
4. **Processing.** The extracted ironsand is transported to a centralised processing plant where it is concentrated and processed. The ironsand is refined using screening and gravity separation. The ironsand is mixed into a slurry and pumped through a seabed pipeline to a bulk carrier ship moored at the Port of Taharoa. The export pipelines run from the processing and storage facility located on land to a Single Buoy Mooring (SBM), located approximately 3.5 km offshore.
5. **Ship loading and dewatering.** Bulk carrier ships moor at the SBM to receive the ironsand in slurry form from the export pipelines. Each ship contains dewatering equipment and the resulting freshwater, containing residual fine suspended material (inert, inorganic geological material) that is removed from the ironsand slurry, is discharged from the ship to the sea. The discharge forms a buoyant plume that floats on the seawater surface before dispersal and dilution. Ship loading operations are currently undertaken approximately 20 times per year and will increase in frequency in future as production increases up to a projected maximum of 35 times per year. Each ship loading activity takes approximately 90 hours (of pumping time) however weather conditions have an influence on loading timeframes.

6. **Tailings disposal and rehabilitation of mined areas.** The tailings (ferrous and non-ferrous sand, silts and clays) which are separated from the exportable product are pumped as a slurry to tailings disposal areas. The discharged slurry dewateres by gravity, with the drainage water collected and directed into a settlement pond or ponds. Once the tailings have dewatered, mechanical plant (excavators and dozers) redistribute the material to form the grade and levels required by the rehabilitation plan for that area. Following this the land may be stabilised, top soiled and replanted.

To operate the mine, the process requires the abstraction of water from the Wainui Stream via a constructed dam incorporating a fish pass, and the discharge of stormwater to the Wainui Stream and the discharge of process water to settling ponds. Excess stormwater and process water is discharged to the CMA via the ship loading pipelines.

The activities sought to be authorised as part of the Northern Block Mining Project include (but are not limited to):

- (a) vegetation, topsoil and overburden removal, and excavation and processing of iron sand above and below the water table (as above);
- (b) the transportation of that product via temporary pipelines to the established processing plant on the Central and Southern Block;
- (c) processing (as above);
- (d) discharge of process water to land; and
- (e) tailing disposal and rehabilitation of mined areas (as above).

The Northern Block Mining Project will rely on / be supported by the processing infrastructure located on the Central and Southern Blocks. It will also rely on / be supported by the consents being sought for the Central and Southern Block to take and use water from the Wainui Stream, discharge of stormwater to the Wainui Stream and the CMA, discharge of process water to the CMA and transport of processed product from the processing facility through the ship-loading pipelines to the CMA. No changes are being proposed to the existing water take limits and discharge limits to facilitate mining of the Northern Block.

3 Approvals sought

3.1 Resource Management Act 1991

A summary of the resource consents that are required for the Northern, Central and Southern Blocks is set out below.

3.1.1 Resource consents required for the Northern Block

National Environmental Standard for Freshwater 2020 – consents to clear vegetation and undertake earthworks within and within 10m of a natural inland wetland. Consents are also required to take, use, dam, or divert water within and within 100 m of a natural inland wetland and to discharge water within and within 100 m of a natural inland wetland.

National Environmental Standard for Commercial Forestry 2017 – consent to harvest pine trees within Class 8e land.

Operative Waikato Regional Plan – consents for soil disturbance and vegetation clearance activities, diversion and taking of groundwater and surface of water associated with mining above and below the water table, discharge of a contaminant to land or water (process water and placement of tailings) and for overburden disposal to land.

Additionally, resource consent is required under the Operative Waitomo District Plan for the potential disturbance of archaeological sites recorded in the Plan - this consent applies to the Northern Block only given that mining has occurred since the early 1970's on the Central and Southern Blocks.

3.1.2 Resource consents required for the Central and Southern Blocks

The resource consents set out above are also required for the Central and Southern Blocks.² In addition, the following resource consents are required for the Central and Southern Blocks Project:

Operative Waikato Regional Plan – consents for the damming, diversion and taking of surface water and groundwater, for stream bed disturbance, and for the discharge of stormwater to surface water.

Operative and Proposed Waikato Regional Coastal Plans – consents for the use and occupation of the Coastal Marine Area by the export pipelines and the SBM, for discharges to and depositions in the CMA from shiploading activities, and for the discharge of stormwater from the export pipelines.

3.2 Wildlife Act 1953

A wildlife permit will be required to manage lizards if they are identified prior to vegetation removal or ground disturbance works.

3.3 Heritage New Zealand Pouhere Taonga Act 2014

Archaeological authorities will be sought due to the potential for currently undiscovered archaeological features to be disturbed by mining activities (excluding urupa and archaeological areas reserved from mining which will not be disturbed).

4 Benefits of the Projects

The continuation of the mining activity on the Taharoa C Block that will be facilitated by the approvals sought under the FTAA will generate significant regional and national benefits. The Central and Southern Block Mining Project and Northern Block Project will directly contribute billions to the New Zealand economy (through employment, income for landowners, business for regional supplies and the payment of taxes).

The mine provides significant employment opportunities for the community, particularly local Māori. Over 82% of income earned by local Ngāti Mahuta comes from employment at the mine. TIL has a core workforce of 170-80 people but employs upwards of 300 staff and contractors.

TIL relies on locally sourced goods and services including the supply of electricity and services from surrounding areas including Kawhia, Te Kuiti, Otorohanga, Te Awamutu and Hamilton. TIL also relies on specialist sub-contractor support including the maintenance and management of specialised mine machinery and equipment. The support TIL relies on (and will continue to rely on) from

² Excluding the resource consent required for archaeological site disturbance.

surrounding centres for the Northern Block Project and Central and Southern Block Mining Project will inject billions into the local economy over the life of the consents sought for the Project.

The mine also provides essential benefits to the local Taharoa Village which was established around the mine and exists today because of the substantial financial contribution the mine makes every year.

5 Summary of potential adverse effects on the environment

The following high-level summary of effects on the environment is based on technical assessments previously completed in relation to mining of the Central and Southern blocks. These assessments are currently being updated, and additional assessments are being completed for mining of the Northern Block. A full assessment of effects supported by technical assessments will be included in the applications for the Northern and Central/Southern Blocks respectively.

5.1 Effects common to the Northern, Central and Southern Blocks

5.1.1 Effects on terrestrial ecology (including bats, birds, lizards)

Disturbance from mining activities has the potential to have adverse effects on wetland and grassland bird species. The loss of existing grassland due to the mining activity may also result in potential injury or death of various threatened native skink present in low numbers in the grassland. The overall level of effect on terrestrial ecology has been assessed as being **low** with the provision of an over-arching Environmental Management Plan (EMP), including an Avifauna Management Plan, Bat Management Plan and a Lizard Management Plan, and imposition of appropriate conditions such as a requirement for there to be a 30 m planting buffer around all natural water bodies. Subject to the imposition of conditions, the overall level of effects on terrestrial ecology has been assessed as **minor**.

5.1.2 Effects of mining below the water table

When mining activity interacts with groundwater there may be the potential for adverse effects on surface freshwater bodies if there is a hydraulic connection between the groundwater and surface water. This connection will be carefully monitored. Any adverse effects on the primary freshwater bodies on the site (the Mitiwai Stream and the Wainui Stream) can be avoided and mitigated through consent conditions including for example, requirements to maintain a minimum flow within the streams.

5.1.3 Effects of discharge to land

The discharge of tailings and surplus process water to land has the potential to cause adverse effects on landform, groundwater and nearby waterways. The tailings material is re-formed as close as practicable to the original landform. The discharge of surplus process water does not result in contamination of groundwater due to the natural filtering provided by the sandy ground conditions. Overall, the adverse effects of discharges to land have been assessed as **less than minor**.

5.1.4 Land disturbance effects

The mining operation is located in a high-risk erosion area and the mining and stockpiling of iron sand has the potential to result in adverse effects on land stability. Given that the mine has a good operational history with no erosion issues requiring mitigation, a rehabilitation process and

revegetation plan is followed for disturbed areas, and perennial waterbody mining setbacks are imposed, any adverse effects can be considered **negligible**.

5.1.5 Archaeological effects

Taharoa C Block is and has always been Māori land which means that there is elevated potential for accidental discovery of koi iwi and other taonga in the dune environment of the area. Ngāti Mahuta derived tikanga and protocols apply when discoveries of koiwi and taonga occur in the Taharoa dune environment as a result of mining activity, and that tikanga/protocol is reflected in existing and proposed consent conditions. Defined urupā are located within the dune system where accidentally discovered koiwi are interred with appropriate tikanga being observed. A buffer in which no mining occurs is observed around each urupā.

All of these measures and practices will continue and mitigate the potential adverse effects in relation to archaeology to **less than minor** levels.

5.1.6 Cultural effects

In considering cultural effects, it is important to note the cultural benefits the ongoing operation of the mine has for Ngati Mahuta as tangata whenua. These benefits include employment benefits, royalties, and support for the local community. Ngati Mahuta, though the Taharoa C Block Incorporation, own the land on which the mine operates and is paid significant royalties from the mine. The mine also supports the employment and growth of Ngati Mahuta whanau. The local employment opportunity generated by the mine has allowed the local community to retain members of the community who may have otherwise moved away to seek employment elsewhere and lost their connection to the land.

TIL understand the views of the respective Taharoa Marae and Te Runanga in relation to the potential cultural effects of the Central and Southern Block Project. In summary, at a high-level:

The damming of the Wainui Stream has the potential to have adverse effects on the health of Lake Taharoa and its indigenous fishery, an important matter to Ngāti Mahuta. The maintenance of the effectiveness of the fish pass at the dam in the Wainui Stream is important to ensure the presence of indigenous fish species in the stream and lake upstream of the dam continues.

The maintenance and monitoring of baseflow in the Mitiwai Stream is also an important matter from a cultural perspective. TIL has engaged expert consultants to monitor the stream to ensure that TIL understands the potential effects of its mining activity on the Stream, which will be managed through consent conditions. Rehabilitation of the mine site to a sustainable landform and land cover is also an important matter to Ngāti Mahuta. Representatives of Ngāti Mahuta have shared their desire for the land to be returned to its natural state following mining activity (being rolling sand dunes with some pockets of vegetation). In that regard, TIL has developed and is implementing an overall Site Rehabilitation Plan and updated Conceptual Site Closure Plan in place to be implemented in the event that the mine closes in the future.

TIL propose to consult with the respective Taharoa Marae and Te Runanga in the preparation of the various management plans that govern the management of effects at the mine. Such consultation and engagement benefits both parties – TIL will gain the benefit of access to the skills and expertise that reside within the marae and hapu whanau, while marae and hapu whanau will have the opportunity to influence the content of management plans that will play an important part in managing the ongoing effects of the mining activity. TIL will also propose the provision of a website

which includes monthly monitoring records to communicate data to mana whenua and the community.

5.1.7 Air Quality Effects

The mine is located in an isolated location subject to extreme westerly winds. In this environment, there is potential for wind-blown sand from the mine site to generate adverse effects on adjoining and adjacent sites to the mine, including in Taharoa Village. TIL implement a range of avoidance and mitigation techniques to control such emissions including the erection of fencing to trap sand particles, placing ground cover (for example, coconut matting) on exposed areas, using mobile and automated fixed watering systems on internal site roads, enforcing vehicle speed limits, and progressively rehabilitating mined out areas. These measures mean that the mine site can operate in accordance with the relevant permitted activity rule of the Waikato Regional Plan with regards to air quality. TIL proposes to implement a Dust Management Plan to manage the implementation of these dust prevention mechanisms. Although there remains the potential for off-site discharges of dust due to the coastal environment, these discharges are highly unlikely to result in adverse effects to human health. Acoustic Effects

The mining activities have the potential to have adverse noise effects on key sensitive receptors on sites adjoining the Northern Block (1891 Taharoa Road, 1891A Taharoa Road, Te Kōraha Marae and 25 Rotopuhoe Road). However, these receptors are located several hundred metres from where mining will occur on the Northern Block and given this separation distance, it is expected that the works will be able to be managed to comply with the Waitomo District Plan daytime and nighttime noise limits. As a result, any potential adverse effects from noise from mining on the Northern Block on sensitive receivers is expected to be **less than minor**.

Mining on the Central and Southern Blocks has been continuous since the 1970s and benefits from existing use rights with respect to noise levels and associated acoustic effects. Notwithstanding this, noise levels are expected to be compliant with District Plan noise limits. TIL will continue to adopt the best practicable option to ensure that the emission of noise from these blocks does not exceed a reasonable level for any nearby sensitive receptors.

5.2 Effects relating to the Central and Southern Blocks only

5.2.1 Effects of damming Wainui Stream

Authorisation of the dam in the Wainui Stream will result in a similar water regime to what is currently present. Fish passage will be provided for via the monitoring and maintenance of a fish pass which achieves the intended purpose of allowing grey mullet and other targeted species to be able to navigate upstream to Lake Taharoa. The downstream migration of juvenile native fish can be adequately addressed through consent conditions which include the retention of a minimum flow within the fish pass and downstream of the dam, as well as monitoring of fish pass performance. As a result, the effects of the dam on fish passage has been assessed as **negligible**.

5.2.2 Effects on water quantity

Water is extracted from the impounded section of the Wainui Stream for mining and shiploading processes. Separate water take consents are held for the mining and shiploading takes and the consents cannot be exercised at the same time. The mine is currently operating within the historically consented limits for water abstraction and no further water quantity is required for the continued operation of the mine. The Wainui Stream catchment is not over-allocated and there are

no permits held by any other party to take water from the stream. As a result, adverse water quantity effects are avoided.

5.2.3 Effects of water take on marginal wetlands

The proposed water takes have the potential to have adverse effects on marginal wetlands around the edges of Lake Taharoa. Noting that the wetlands have acclimated to the lake levels that have been experienced since the installation of the dam in the Wainui Stream in the early 1970's, the magnitude of these effects has been assessed as **low** given that the water takes will be operated in a similar manner to what has been historically occurred at the mine. Importantly, TIL is proposing to retain existing conditions that require water takes to cease if the lake levels reach a certain minimum point. Conditions will also be proposed that require ongoing monitoring of the lake margin wetlands and management responses to be implemented if the lake level remains low for an extended period and the wetlands show signs of stress (other than that caused by natural seasonal conditions).

5.2.4 Effects on benthic fauna

The proposed ship-loading infrastructure including pipelines on the seabed and the tethering mechanism for the SBM will continue to occupy part of the seabed and impact on a small amount of available subtidal sandflat habitat. Given the small percentage of the available subtidal sandflat habitat this represents, this is assessed as having a low magnitude of effect on benthic ecology. The effects of constructing the pipeline have also been assessed as being **low**.

5.2.5 Effects on fish and seafood species

The discharge from the ship loading process has the potential to have adverse effects on existing habitat for fish and seafood species. Given the relatively infrequent and short-term nature of the discharge and the highly mobile nature of fish species the potential adverse effects are assessed as **negligible**. The presence of green lipped mussels in the area of the discharge indicates that ongoing ship loading discharges do not inhibit mussel colonisation and has a **negligible** effect on seafood resource species.

5.2.6 Effects on marine mammals

A number of marine mammal species can be present in the wider marine area around Port Taharoa such as Māui dolphins, common dolphins, southern right whales and Orca/killer whales. Given the low level of risk posed by the ship loading operation and the fact that it has been occurring in the vicinity since the early 1970's, the overall risk of adverse effects for marine mammals is assessed as **negligible**. Nevertheless, to recognise the sensitivity of the marine mammals that traverse the area, TIL propose conditions that require an underwater noise survey to be undertaken if 35 ship visits occur in a 12 month period, in order to inform best practice underwater noise measures.

5.2.7 Effects on coastal processes

TIL seeks to continue the ability to discharge up to 75,000m³ per day of ship loading water, including freshwater and fine sediment, up to a maximum of 7,500,000m³ per year. As a result of dilution and dispersion of the sediment plume provided by oceanic conditions, the effect of this discharge on coastal processes has been assessed as being **less than minor**.

5.2.8 Effects of discharges in the Coastal Marine Area (CMA)

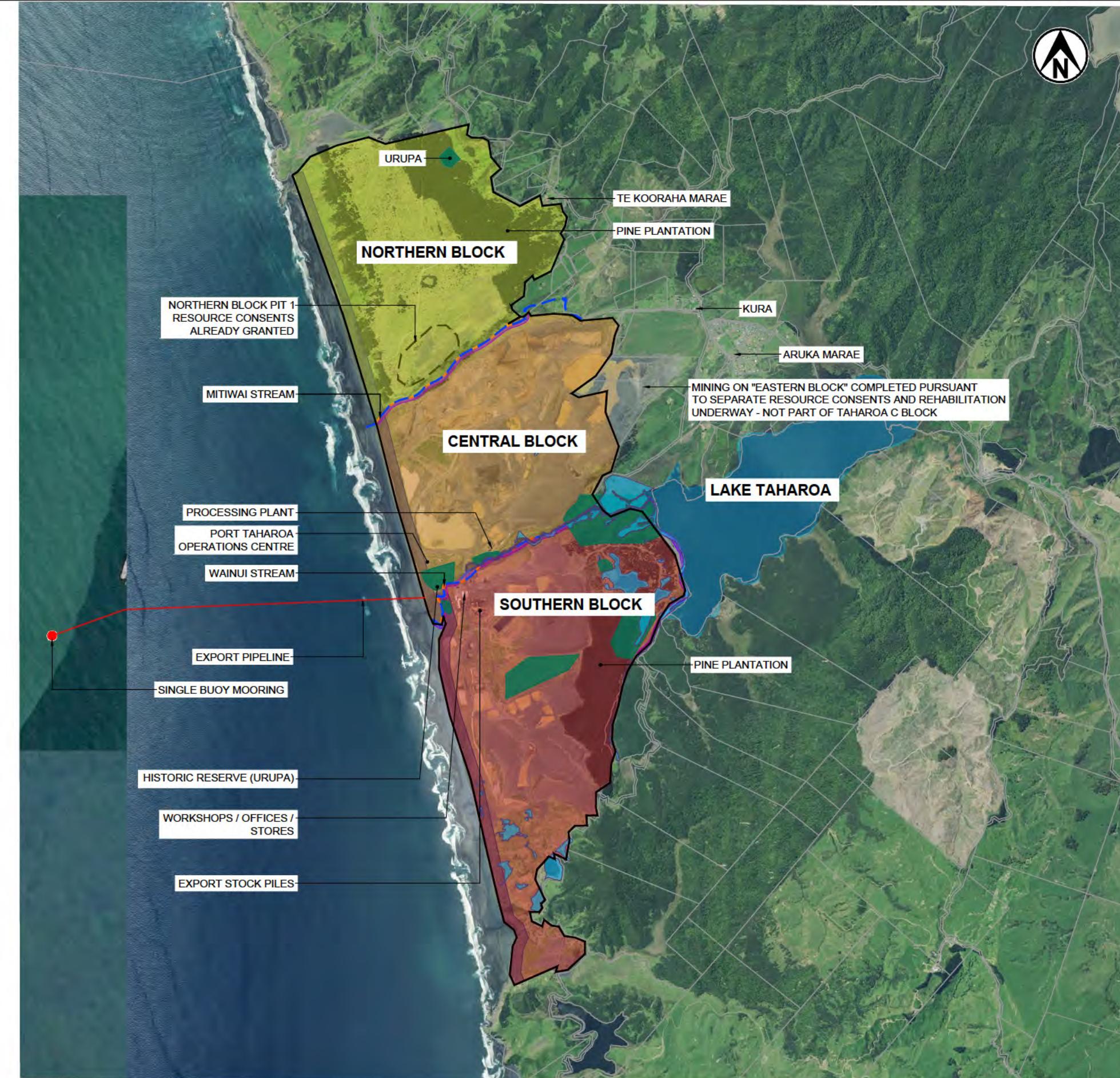
The potential adverse effects of the sediment discharge from the ship-loading events have been addressed above. The discharge includes some trace levels of naturally occurring contaminants in the ironsand that is pumped in slurry form into the ship. Because of the extremely low levels of the naturally occurring contaminants, and the dilution provided by the sea water, the discharge will not result in any measurable toxicity effect on benthic fauna.

TIL is seeking consent to continue to discharge excess process water and stormwater to the CMA at a rate of 32,000m³/day. This discharge occurs infrequently and when there is no suitable alternative to provide for the discharge on land - primarily at times of prolonged heavy rainfall. The potential ecological effects from the process water/stormwater discharge are likely to be even less than those of the ship loading discharge which were assessed to be less than minor. Correspondingly, no further actions to avoid, remedy or mitigate potential effects from the process wastewater and stormwater discharges are required apart from monitoring of the discharge quality and composition.

5.2.9 Effects on navigation safety

The continued ship movements to and from the Port of Taharoa and the occupation of the CMA by ship loading infrastructure have the potential to have adverse effects on navigational safety of other users of the CMA. However, the use of this area for recreational watercraft and commercial vessels is infrequent and the movement of ironsand export ships has been established in the area since the early 1970's. No more than one ship can access the mooring buoy at one time. Furthermore, the Port of Taharoa is operated in compliance with the New Zealand Port and Harbour Marine Safety Code, the Harbourmaster previously had no objection to the continued activity and several improvements have been implemented since the granting of the now expired resource consents in 2002. For these reasons, potential adverse effects on navigation safety have been assessed as **less than minor**.

LEGEND	
	STREAM
	PROPERTY BOUNDARIES
	MINING LICENCE AREA (TAHAROA C BLOCK)
	NORTHERN BLOCK
	CENTRAL BLOCK
	SOUTHERN BLOCK
	30m PERENNIAL WATER BODY / STREAM SETBACK
	100m MHWS SETBACK SUBJECT TO SURVEY
	ARCHEOLOGICAL AREAS RESERVED FROM MINING
	WETLAND



Tim Fletcher

Subject: TIL Fast-track hui with Te Kooraha Marae Trustees
Location: Jet Park Hotel (201 Airport Road, Hamilton Waikato 3282, New Zealand)

Start: Thu 11/09/2025 11:30 am
End: Thu 11/09/2025 2:30 pm

Recurrence: (none)

Meeting Status: Accepted

Organizer: Harach, Olivia OH

TAHAROA IRONSANDS LIMITED

CONSULTATION ON FAST-TRACK APPLICATIONS WITH TRUSTEES OF TE KOORAHĀ MARAE

AGENDA

Date:	Thursday 11 September 2025
Time:	11:30am – 2:30pm (with morning tea to begin)
Location:	Jet Park Hotel and Conference Centre, Hamilton
Attendees on behalf of Te Kooraha Marae	<ul style="list-style-type: none">• Taituwha King (Trust Chair)• Ngahuia Herangi (Trust Co-secretary)• Kahurangi Rayner (Trust Co-secretary)• Jacqui King (Trust Treasurer)• George Kana (Trustee)• Rangi King (Trustee)• Sandra Grant (Te Whakakitenga o Waikato Representative)• Gerald Lanning (Simpson Grierson, Legal Counsel)• Nevada Huaki (Environmental Planner)
Attendees on behalf of Taharoa Ironsands Limited	<ul style="list-style-type: none">• Wayne Coffey (Managing Director and Chair, Taharoa Ironsands Limited)• Hoturoa Barclay-Kerr (Chairman, Taharoa C Incorporation)• Jared Pettersson (Project Manager, Enviser)• Grant Eccles (Lead Planner, Tonkin + Taylor)• Stephanie de Groot (Legal counsel, MinterEllisonRuddWatts)

TOPICS FOR DISCUSSION:

1. Update from TIL project team on status of Fast-track applications – timing, progress towards completion and availability of application documents for Te Kooraha to review.
2. Summary by TIL project team of:
 - a. Approvals to be sought for Central and Southern Mining Block Project.
 - b. Explanation by TIL project team on reasons for pursuing the Fast-track process for the Central & Southern Block Mining Project.
 - c. Differences between Central & Southern Block Mining Project RMA application and Fast-track application.
 - d. Progress with hydrological assessments associated with mining in groundwater and the scope of 'wet-mining' activities to be included in the application.
 - e. Approvals to be sought for Northern Block Mining Project.
 - f. Relationship between the consents being sought for both Projects, in respect of water takes and ship-loading.
 - g. Proposed approach to conditions for both Projects.
3. Summary by TIL project team of Fast-track approvals process.
4. Specific topics for discussion based on the Trustee's written feedback:
 - a. TIL's approach to rehabilitation.
 - b. Fish passage/water intake.
 - c. Reports of tuna mortality on 26 March 2025.
 - d. Hornwort presence in Wainui Stream.
 - e. Maintaining the mauri of the Mitiwai Stream.
 - f. Roading access to Te Kooraha Marae.

- g. On-going engagement and hui.
- h. Northern Block Mining Project.

5. Any other feedback or business?
6. Confirm any actions arising.

Note: Q&A and discussion is proposed after each topic for discussion before moving on to the next.

From: Harach, Olivia OH [REDACTED]
Sent: Wednesday, 25 June 2025 2:26 pm
To: Holly-Marie Rearic; Stephanie de Groot
Subject: FW: Invitation to Te Ruunanga o Ngati Mahuta ki to Hauaaruru Charitable Trust to meet or provide written feedback – Taharoa Ironsands Limited Fast-track Applications
Attachments: Consultation letter to Te Ruunanga o Ngati Mahuta ki to Hauaaruru Charitable Trust dated 24 June 2025.pdf
Categories: Important



Olivia Harach
Taharoa Ironsands Ltd
[REDACTED]

From: Harach, Olivia OH
Sent: Wednesday, 25 June 2025 2:18 pm
To: [REDACTED]
Cc: [REDACTED] Coffey, Wayne WC [REDACTED]
Subject: Invitation to Te Ruunanga o Ngati Mahuta ki to Hauaaruru Charitable Trust to meet or provide written feedback – Taharoa Ironsands Limited Fast-track Applications

Good afternoon Ashlee and Mahi

Please see the **attached** letter in relation to applications that TIL is preparing for the Central and Southern Block Project and Northern Block Project under the Fast-track Approvals Act 2024.

The purpose of the letter is to offer you the opportunity to discuss the applications with TIL and/or for you to provide your written feedback on the applications.

Due to an administrative error, the attached letter was not sent when we originally intended to send it a few weeks ago.

Please let me know if you have any queries.

Regards
Wayne



Taharoa Ironsands Ltd

24 June 2025

BY EMAIL: [REDACTED]

Te Runnanga o Ngati Mahuta ki to Hauaaru Charitable Trust
C/- Ashlee Aspinall & Mahi Newton-King
[REDACTED]

Dear Ashlee & Mahi

Taharoa Ironsands Limited – Fast-track Approvals Act 2024 applications

1. As you know, Taharoa Ironsands Limited (**TIL**) owns and operates the Taharoa Ironsand Mine which has been in operation since 1973.
2. The Mine is divided into blocks known as the Northern, Central and Southern Block which are all located on Taharoa C Block, as well as the Eastern Blocks and the Te Mania Extension which are located on adjoining land.
3. TIL needs to replace its resource consents relating to the Central and Southern Blocks to continue operating the existing Mine and to enable expansion of the Mine in the future. TIL sought to do so by making an application in 2020 under the standard resource consenting process under the Resource Management Act 1991 (**RMA**). The consenting process under the RMA was lengthy and TIL was not satisfied with the decision, which led it to appeal the decision to the Environment Court on 12 December 2024.
4. Since the appeal was filed, the Fast-track Approvals Act 2024 (**FTAA**) has been enacted. The FTAA establishes a fast-track approvals regime for projects of national and regional significance in New Zealand.
5. The reconsenting of the Central and Southern Blocks of the Mine has been recognised by the Government as having regional and national significance and has been directly referred to utilise the Fast-Track approval process. The FTAA therefore provides an alternative, and suitable, consenting pathway for the Central and Southern Blocks. TIL is also proposing to extend its operation into the Northern Block. New mining of the Northern Block has also been directly referred by the Government to utilise the Fast-track process on account of its regional and national significance.
6. We are now preparing our substantive applications for both projects which will be considered under the FTAA. We are intending to file both applications with the Environmental Protection Agency by no later than June 2025. Enviser is managing the preparation of the applications on behalf of TIL with input from a range of technical consultants, including Grant Eccles (planner) of Tonkin & Taylor Limited. Tonkin & Taylor has provided a high-level summary of what will be sought in each application in **Appendix A**.
7. We have previously engaged with you in respect of our application under the RMA for the Central and Southern Blocks, and you participated in the hearing of that application. TIL has an understanding of your view in respect of the Mine and the consenting of the Central and Southern Blocks from that process. However, we are writing to provide you with an opportunity to engage with us further and to discuss the FTAA applications, or otherwise provide written feedback, while

they are being prepared. We also have identified that you have sought recognition of your customary interests under the Marine and Coastal Area (Takutai Moana) Act 2011.

8. We are writing to provide you with an opportunity to discuss the applications while they are being prepared. We are otherwise open to receiving written feedback if you do not wish to meet.
9. We are looking to arrange a meeting to discuss the applications as soon as possible. Otherwise, we would appreciate that any written feedback is provided by 11 July 2025.
10. If you would like to provide written feedback, please let us know using the following email address: [REDACTED]
11. If you have any queries, please let us know.

Yours faithfully

[REDACTED]
Wayne Coffey
Managing Director and CEO of Taharoa Ironsands Limited

Appendix A

Taharoa Ironsands Mine – Project summary for pre-application consultation

- **Northern Block Mining Project**
- **Central and Southern Block Mining Project**

1 Overview

Taharoa Ironsands Limited (TIL) operate an iron sand mine at Taharoa, on the West Coast of the North Island, approximately 8 km south of Kawhia Harbour. The Taharoa Mine has been in operation since 1973 (owned by New Zealand Steel until 2017). The mine site covers an area of approximately 1,300 hectares, primarily on Māori land legally described as the Taharoa C Block and the part of the coastal marine area (CMA) legally defined as Port Taharoa (**mine**).

For the purposes of mining activity, Taharoa C Block is divided into blocks. As shown on the attached plan:

- (a) the area of the site to the north of the Mitiwai Stream is known as the Northern Block.
- (b) the area of the site between the Mitiwai Stream and the Wainui Stream is known as the Central Block; and
- (c) the area of the site to the south of the Wainui Stream is known as the Southern Block.

The Central and Southern Blocks are currently operated under a suite of resource consents granted in 2006.¹ Mining activity has not historically occurred in the Northern Block.

TIL is now preparing applications for the necessary resource consents, wildlife permits and archaeological authorities under the Fast-track Approvals Act 2024 (FTAA) to authorise:

- the extraction of sand (and associated activities) on the Northern Block (known as the Northern Block Mining Project); and
- the continuation of sand extraction (and associated activities which support the entire mine, including its export operation) on the Central and Southern Blocks and in the CMA (known as the Central and Southern Block Mining Project).

The following describes the proposed mining and associated works which are subject to the applications, details the resource consents and approvals sought and provides a high-level summary of the potential effects on the environment of each project at this stage. As the applications are currently being prepared, this information is based on the work completed as of 01 May 2025, and is subject to change.

¹ TIL also hold separate resource consents for mining of (i) the “Eastern Block” granted in 2018 (mining now completed and rehabilitation underway), and (ii) the “Te Mania Extension” adjoining the Eastern Block granted in 2022 (mining yet to commence), and (iii) a small area in the Northern Block known as “Pit 1” granted in late 2024 (mining currently in progress). Mining at these locations relies on the water take resource consents and the coastal permits granted for the Central and Southern Blocks.

2 Description of proposed works

TIL propose to mine ironsand throughout the Northern, Central and Southern Blocks excluding areas where mining restrictions will apply. The areas where mining activity will not take place are within 100 m of Mean High Water Springs, 30 m of perennial water bodies (Mitiwai Stream, Wainui Stream and Lake Taharoa), and within already identified urupa and archaeological re-interment areas on the mine. Other mining exclusion areas may be identified as part of the completion of technical assessments that are currently underway. Any additional mining exclusion areas that are identified by the technical assessments will be included in the substantive FTAA applications.

Whilst the process to extract, process and export the ironsand can and does vary depending on the nature of the deposit being mined at the time, it follows the same broad steps. These activities, which are sought to be authorised as part of the Central and Southern Block Project, include:

1. **Vegetation, topsoil and overburden removal, including harvesting of trees with commercial value (pines).** Useful native species are removed prior to stripping of topsoil for use in the eco-sourced nursery on site. Topsoil is stockpiled on-site for use in future rehabilitation activities.
2. **Extraction and processing of Ironsand.** Raw Ironsand is extracted using various methods and equipment depending on ground conditions. In upper layers, standard earthmoving machinery such as excavators, bulldozers, and trucks are used to collect the ironsand and deposit it into a Dry Mining Unit (DMU). The DMU mixes the ironsand with water to form a slurry, which is then pumped to a treatment plant for titanomagnetite extraction.
3. During this process, groundwater and surface water may enter the active excavation area. To maintain dry working conditions, this water may be pumped out as required. However, as mining progresses to deeper layers, maintaining a dry pit may become impractical. In such cases, a cutter-suction dredge is used in a water-filled pond. The dredge floats on the water and uses a submerged dredge head to cut, fluidise, and pump the Ironsand slurry through a pipeline to the treatment plant. The dredge is capable of operating at depths of 8 to 15 meters below the pond surface. In some instances, a long-reach excavator may also be used to extract material from within the pond.
4. **Processing.** The extracted ironsand is transported to a centralised processing plant where it is concentrated and processed. The ironsand is refined using screening and gravity separation. The ironsand is mixed into a slurry and pumped through a seabed pipeline to a bulk carrier ship moored at the Port of Taharoa. The export pipelines run from the processing and storage facility located on land to a Single Buoy Mooring (SBM), located approximately 3.5 km offshore.
5. **Ship loading and dewatering.** Bulk carrier ships moor at the SBM to receive the ironsand in slurry form from the export pipelines. Each ship contains dewatering equipment and the resulting freshwater, containing residual fine suspended material (inert, inorganic geological material) that is removed from the ironsand slurry, is discharged from the ship to the sea. The discharge forms a buoyant plume that floats on the seawater surface before dispersal and dilution. Ship loading operations are currently undertaken approximately 20 times per year and will increase in frequency in future as production increases up to a projected maximum of 35 times per year. Each ship loading activity takes approximately 90 hours (of pumping time) however weather conditions have an influence on loading timeframes.

6. **Tailings disposal and rehabilitation of mined areas.** The tailings (ferrous and non-ferrous sand, silts and clays) which are separated from the exportable product are pumped as a slurry to tailings disposal areas. The discharged slurry dewateres by gravity, with the drainage water collected and directed into a settlement pond or ponds. Once the tailings have dewatered, mechanical plant (excavators and dozers) redistribute the material to form the grade and levels required by the rehabilitation plan for that area. Following this the land may be stabilised, top soiled and replanted.

To operate the mine, the process requires the abstraction of water from the Wainui Stream via a constructed dam incorporating a fish pass, and the discharge of stormwater to the Wainui Stream and the discharge of process water to settling ponds. Excess stormwater and process water is discharged to the CMA via the ship loading pipelines.

The activities sought to be authorised as part of the Northern Block Mining Project include (but are not limited to):

- (a) vegetation, topsoil and overburden removal, and excavation and processing of iron sand above and below the water table (as above);
- (b) the transportation of that product via temporary pipelines to the established processing plant on the Central and Southern Block;
- (c) processing (as above);
- (d) discharge of process water to land; and
- (e) tailing disposal and rehabilitation of mined areas (as above).

The Northern Block Mining Project will rely on / be supported by the processing infrastructure located on the Central and Southern Blocks. It will also rely on / be supported by the consents being sought for the Central and Southern Block to take and use water from the Wainui Stream, discharge of stormwater to the Wainui Stream and the CMA, discharge of process water to the CMA and transport of processed product from the processing facility through the ship-loading pipelines to the CMA. No changes are being proposed to the existing water take limits and discharge limits to facilitate mining of the Northern Block.

3 Approvals sought

3.1 Resource Management Act 1991

A summary of the resource consents that are required for the Northern, Central and Southern Blocks is set out below.

3.1.1 Resource consents required for the Northern Block

National Environmental Standard for Freshwater 2020 – consents to clear vegetation and undertake earthworks within and within 10m of a natural inland wetland. Consents are also required to take, use, dam, or divert water within and within 100 m of a natural inland wetland and to discharge water within and within 100 m of a natural inland wetland.

National Environmental Standard for Commercial Forestry 2017 – consent to harvest pine trees within Class 8e land.

Operative Waikato Regional Plan – consents for soil disturbance and vegetation clearance activities, diversion and taking of groundwater and surface of water associated with mining above and below the water table, discharge of a contaminant to land or water (process water and placement of tailings) and for overburden disposal to land.

Additionally, resource consent is required under the Operative Waitomo District Plan for the potential disturbance of archaeological sites recorded in the Plan - this consent applies to the Northern Block only given that mining has occurred since the early 1970's on the Central and Southern Blocks.

3.1.2 Resource consents required for the Central and Southern Blocks

The resource consents set out above are also required for the Central and Southern Blocks.² In addition, the following resource consents are required for the Central and Southern Blocks Project:

Operative Waikato Regional Plan – consents for the damming, diversion and taking of surface water and groundwater, for stream bed disturbance, and for the discharge of stormwater to surface water.

Operative and Proposed Waikato Regional Coastal Plans – consents for the use and occupation of the Coastal Marine Area by the export pipelines and the SBM, for discharges to and depositions in the CMA from shiploading activities, and for the discharge of stormwater from the export pipelines.

3.2 Wildlife Act 1953

A wildlife permit will be required to manage lizards if they are identified prior to vegetation removal or ground disturbance works.

3.3 Heritage New Zealand Pouhere Taonga Act 2014

Archaeological authorities will be sought due to the potential for currently undiscovered archaeological features to be disturbed by mining activities (excluding urupa and archaeological areas reserved from mining which will not be disturbed).

4 Benefits of the Projects

The continuation of the mining activity on the Taharoa C Block that will be facilitated by the approvals sought under the FTAA will generate significant regional and national benefits. The Central and Southern Block Mining Project and Northern Block Project will directly contribute billions to the New Zealand economy (through employment, income for landowners, business for regional supplies and the payment of taxes).

The mine provides significant employment opportunities for the community, particularly local Māori. Over 82% of income earned by local Ngāti Mahuta comes from employment at the mine. TIL has a core workforce of 170-80 people but employs upwards of 300 staff and contractors.

TIL relies on locally sourced goods and services including the supply of electricity and services from surrounding areas including Kawhia, Te Kuiti, Otorohanga, Te Awamutu and Hamilton. TIL also relies on specialist sub-contractor support including the maintenance and management of specialised mine machinery and equipment. The support TIL relies on (and will continue to rely on) from

² Excluding the resource consent required for archaeological site disturbance.

surrounding centres for the Northern Block Project and Central and Southern Block Mining Project will inject billions into the local economy over the life of the consents sought for the Project.

The mine also provides essential benefits to the local Taharoa Village which was established around the mine and exists today because of the substantial financial contribution the mine makes every year.

5 Summary of potential adverse effects on the environment

The following high-level summary of effects on the environment is based on technical assessments previously completed in relation to mining of the Central and Southern blocks. These assessments are currently being updated, and additional assessments are being completed for mining of the Northern Block. A full assessment of effects supported by technical assessments will be included in the applications for the Northern and Central/Southern Blocks respectively.

5.1 Effects common to the Northern, Central and Southern Blocks

5.1.1 Effects on terrestrial ecology (including bats, birds, lizards)

Disturbance from mining activities has the potential to have adverse effects on wetland and grassland bird species. The loss of existing grassland due to the mining activity may also result in potential injury or death of various threatened native skink present in low numbers in the grassland. The overall level of effect on terrestrial ecology has been assessed as being **low** with the provision of an over-arching Environmental Management Plan (EMP), including an Avifauna Management Plan, Bat Management Plan and a Lizard Management Plan, and imposition of appropriate conditions such as a requirement for there to be a 30 m planting buffer around all natural water bodies. Subject to the imposition of conditions, the overall level of effects on terrestrial ecology has been assessed as **minor**.

5.1.2 Effects of mining below the water table

When mining activity interacts with groundwater there may be the potential for adverse effects on surface freshwater bodies if there is a hydraulic connection between the groundwater and surface water. This connection will be carefully monitored. Any adverse effects on the primary freshwater bodies on the site (the Mitiwai Stream and the Wainui Stream) can be avoided and mitigated through consent conditions including for example, requirements to maintain a minimum flow within the streams.

5.1.3 Effects of discharge to land

The discharge of tailings and surplus process water to land has the potential to cause adverse effects on landform, groundwater and nearby waterways. The tailings material is re-formed as close as practicable to the original landform. The discharge of surplus process water does not result in contamination of groundwater due to the natural filtering provided by the sandy ground conditions. Overall, the adverse effects of discharges to land have been assessed as **less than minor**.

5.1.4 Land disturbance effects

The mining operation is located in a high-risk erosion area and the mining and stockpiling of iron sand has the potential to result in adverse effects on land stability. Given that the mine has a good operational history with no erosion issues requiring mitigation, a rehabilitation process and

revegetation plan is followed for disturbed areas, and perennial waterbody mining setbacks are imposed, any adverse effects can be considered **negligible**.

5.1.5 Archaeological effects

Taharoa C Block is and has always been Māori land which means that there is elevated potential for accidental discovery of koi iwi and other taonga in the dune environment of the area. Ngāti Mahuta derived tikanga and protocols apply when discoveries of koiwi and taonga occur in the Taharoa dune environment as a result of mining activity, and that tikanga/protocol is reflected in existing and proposed consent conditions. Defined urupā are located within the dune system where accidentally discovered koiwi are interred with appropriate tikanga being observed. A buffer in which no mining occurs is observed around each urupā.

All of these measures and practices will continue and mitigate the potential adverse effects in relation to archaeology to **less than minor** levels.

5.1.6 Cultural effects

In considering cultural effects, it is important to note the cultural benefits the ongoing operation of the mine has for Ngati Mahuta as tangata whenua. These benefits include employment benefits, royalties, and support for the local community. Ngati Mahuta, though the Taharoa C Block Incorporation, own the land on which the mine operates and is paid significant royalties from the mine. The mine also supports the employment and growth of Ngati Mahuta whanau. The local employment opportunity generated by the mine has allowed the local community to retain members of the community who may have otherwise moved away to seek employment elsewhere and lost their connection to the land.

TIL understand the views of the respective Taharoa Marae and Te Runanga in relation to the potential cultural effects of the Central and Southern Block Project. In summary, at a high-level:

The damming of the Wainui Stream has the potential to have adverse effects on the health of Lake Taharoa and its indigenous fishery, an important matter to Ngāti Mahuta. The maintenance of the effectiveness of the fish pass at the dam in the Wainui Stream is important to ensure the presence of indigenous fish species in the stream and lake upstream of the dam continues.

The maintenance and monitoring of baseflow in the Mitiwai Stream is also an important matter from a cultural perspective. TIL has engaged expert consultants to monitor the stream to ensure that TIL understands the potential effects of its mining activity on the Stream, which will be managed through consent conditions. Rehabilitation of the mine site to a sustainable landform and land cover is also an important matter to Ngāti Mahuta. Representatives of Ngāti Mahuta have shared their desire for the land to be returned to its natural state following mining activity (being rolling sand dunes with some pockets of vegetation). In that regard, TIL has developed and is implementing an overall Site Rehabilitation Plan and updated Conceptual Site Closure Plan in place to be implemented in the event that the mine closes in the future.

TIL propose to consult with the respective Taharoa Marae and Te Runanga in the preparation of the various management plans that govern the management of effects at the mine. Such consultation and engagement benefits both parties – TIL will gain the benefit of access to the skills and expertise that reside within the marae and hapu whanau, while marae and hapu whanau will have the opportunity to influence the content of management plans that will play an important part in managing the ongoing effects of the mining activity. TIL will also propose the provision of a website

which includes monthly monitoring records to communicate data to mana whenua and the community.

5.1.7 Air Quality Effects

The mine is located in an isolated location subject to extreme westerly winds. In this environment, there is potential for wind-blown sand from the mine site to generate adverse effects on adjoining and adjacent sites to the mine, including in Taharoa Village. TIL implement a range of avoidance and mitigation techniques to control such emissions including the erection of fencing to trap sand particles, placing ground cover (for example, coconut matting) on exposed areas, using mobile and automated fixed watering systems on internal site roads, enforcing vehicle speed limits, and progressively rehabilitating mined out areas. These measures mean that the mine site can operate in accordance with the relevant permitted activity rule of the Waikato Regional Plan with regards to air quality. TIL proposes to implement a Dust Management Plan to manage the implementation of these dust prevention mechanisms. Although there remains the potential for off-site discharges of dust due to the coastal environment, these discharges are highly unlikely to result in adverse effects to human health. Acoustic Effects

The mining activities have the potential to have adverse noise effects on key sensitive receptors on sites adjoining the Northern Block (1891 Taharoa Road, 1891A Taharoa Road, Te Kōraha Marae and 25 Rotopuhoe Road). However, these receptors are located several hundred metres from where mining will occur on the Northern Block and given this separation distance, it is expected that the works will be able to be managed to comply with the Waitomo District Plan daytime and nighttime noise limits. As a result, any potential adverse effects from noise from mining on the Northern Block on sensitive receivers is expected to be **less than minor**.

Mining on the Central and Southern Blocks has been continuous since the 1970s and benefits from existing use rights with respect to noise levels and associated acoustic effects. Notwithstanding this, noise levels are expected to be compliant with District Plan noise limits. TIL will continue to adopt the best practicable option to ensure that the emission of noise from these blocks does not exceed a reasonable level for any nearby sensitive receptors.

5.2 Effects relating to the Central and Southern Blocks only

5.2.1 Effects of damming Wainui Stream

Authorisation of the dam in the Wainui Stream will result in a similar water regime to what is currently present. Fish passage will be provided for via the monitoring and maintenance of a fish pass which achieves the intended purpose of allowing grey mullet and other targeted species to be able to navigate upstream to Lake Taharoa. The downstream migration of juvenile native fish can be adequately addressed through consent conditions which include the retention of a minimum flow within the fish pass and downstream of the dam, as well as monitoring of fish pass performance. As a result, the effects of the dam on fish passage has been assessed as **negligible**.

5.2.2 Effects on water quantity

Water is extracted from the impounded section of the Wainui Stream for mining and shiploading processes. Separate water take consents are held for the mining and shiploading takes and the consents cannot be exercised at the same time. The mine is currently operating within the historically consented limits for water abstraction and no further water quantity is required for the continued operation of the mine. The Wainui Stream catchment is not over-allocated and there are

no permits held by any other party to take water from the stream. As a result, adverse water quantity effects are avoided.

5.2.3 Effects of water take on marginal wetlands

The proposed water takes have the potential to have adverse effects on marginal wetlands around the edges of Lake Taharoa. Noting that the wetlands have acclimated to the lake levels that have been experienced since the installation of the dam in the Wainui Stream in the early 1970's, the magnitude of these effects has been assessed as **low** given that the water takes will be operated in a similar manner to what has been historically occurred at the mine. Importantly, TIL is proposing to retain existing conditions that require water takes to cease if the lake levels reach a certain minimum point. Conditions will also be proposed that require ongoing monitoring of the lake margin wetlands and management responses to be implemented if the lake level remains low for an extended period and the wetlands show signs of stress (other than that caused by natural seasonal conditions).

5.2.4 Effects on benthic fauna

The proposed ship-loading infrastructure including pipelines on the seabed and the tethering mechanism for the SBM will continue to occupy part of the seabed and impact on a small amount of available subtidal sandflat habitat. Given the small percentage of the available subtidal sandflat habitat this represents, this is assessed as having a low magnitude of effect on benthic ecology. The effects of constructing the pipeline have also been assessed as being **low**.

5.2.5 Effects on fish and seafood species

The discharge from the ship loading process has the potential to have adverse effects on existing habitat for fish and seafood species. Given the relatively infrequent and short-term nature of the discharge and the highly mobile nature of fish species the potential adverse effects are assessed as **negligible**. The presence of green lipped mussels in the area of the discharge indicates that ongoing ship loading discharges do not inhibit mussel colonisation and has a **negligible** effect on seafood resource species.

5.2.6 Effects on marine mammals

A number of marine mammal species can be present in the wider marine area around Port Taharoa such as Māui dolphins, common dolphins, southern right whales and Orca/killer whales. Given the low level of risk posed by the ship loading operation and the fact that it has been occurring in the vicinity since the early 1970's, the overall risk of adverse effects for marine mammals is assessed as **negligible**. Nevertheless, to recognise the sensitivity of the marine mammals that traverse the area, TIL propose conditions that require an underwater noise survey to be undertaken if 35 ship visits occur in a 12 month period, in order to inform best practice underwater noise measures.

5.2.7 Effects on coastal processes

TIL seeks to continue the ability to discharge up to 75,000m³ per day of ship loading water, including freshwater and fine sediment, up to a maximum of 7,500,000m³ per year. As a result of dilution and dispersion of the sediment plume provided by oceanic conditions, the effect of this discharge on coastal processes has been assessed as being **less than minor**.

5.2.8 Effects of discharges in the Coastal Marine Area (CMA)

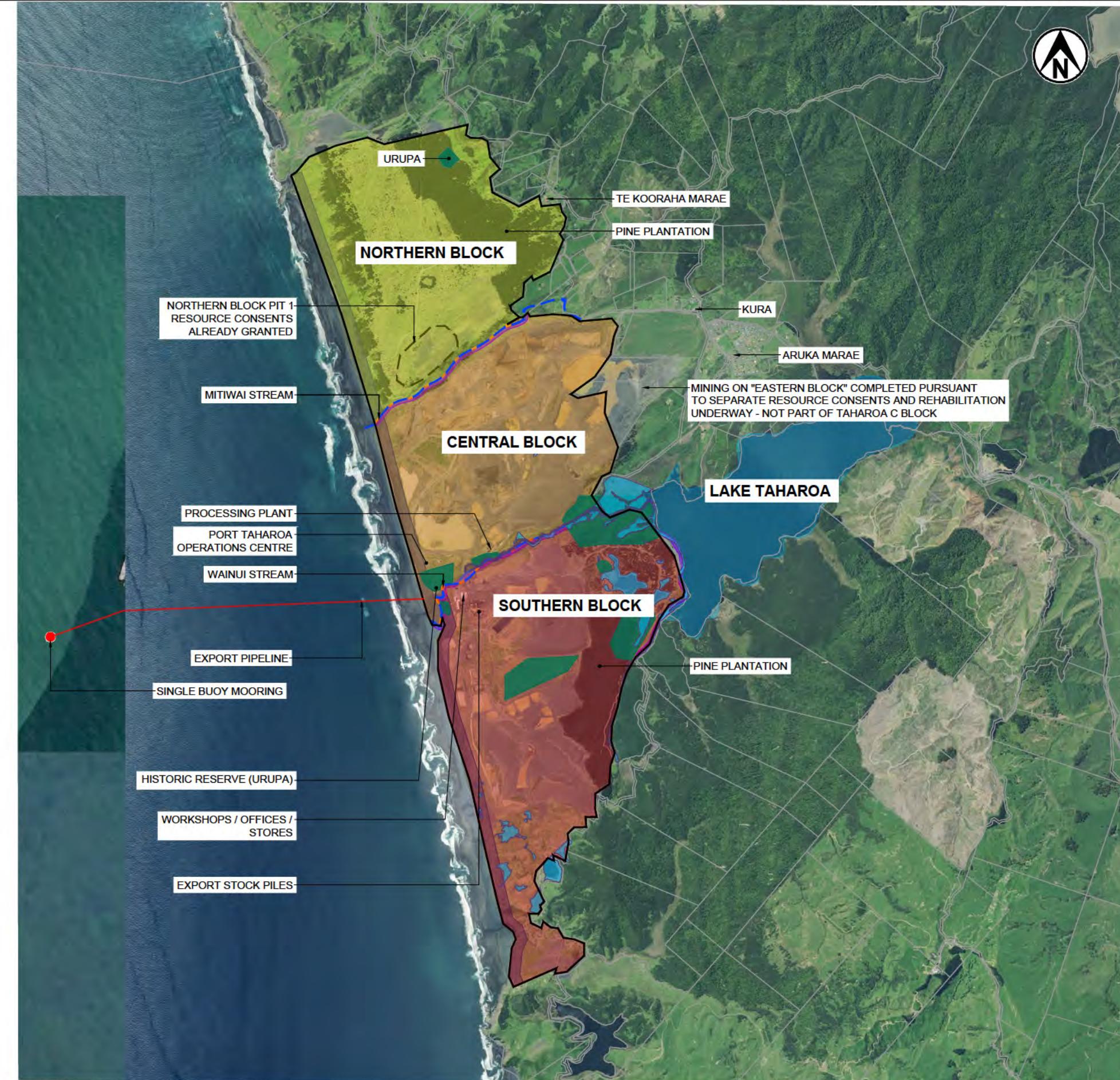
The potential adverse effects of the sediment discharge from the ship-loading events have been addressed above. The discharge includes some trace levels of naturally occurring contaminants in the ironsand that is pumped in slurry form into the ship. Because of the extremely low levels of the naturally occurring contaminants, and the dilution provided by the sea water, the discharge will not result in any measurable toxicity effect on benthic fauna.

TIL is seeking consent to continue to discharge excess process water and stormwater to the CMA at a rate of 32,000m³/day. This discharge occurs infrequently and when there is no suitable alternative to provide for the discharge on land - primarily at times of prolonged heavy rainfall. The potential ecological effects from the process water/stormwater discharge are likely to be even less than those of the ship loading discharge which were assessed to be less than minor. Correspondingly, no further actions to avoid, remedy or mitigate potential effects from the process wastewater and stormwater discharges are required apart from monitoring of the discharge quality and composition.

5.2.9 Effects on navigation safety

The continued ship movements to and from the Port of Taharoa and the occupation of the CMA by ship loading infrastructure have the potential to have adverse effects on navigational safety of other users of the CMA. However, the use of this area for recreational watercraft and commercial vessels is infrequent and the movement of ironsand export ships has been established in the area since the early 1970's. No more than one ship can access the mooring buoy at one time. Furthermore, the Port of Taharoa is operated in compliance with the New Zealand Port and Harbour Marine Safety Code, the Harbourmaster previously had no objection to the continued activity and several improvements have been implemented since the granting of the now expired resource consents in 2002. For these reasons, potential adverse effects on navigation safety have been assessed as **less than minor**.

LEGEND	
	STREAM
	PROPERTY BOUNDARIES
	MINING LICENCE AREA (TAHAROA C BLOCK)
	NORTHERN BLOCK
	CENTRAL BLOCK
	SOUTHERN BLOCK
	30m PERENNIAL WATER BODY / STREAM SETBACK
	100m MHWS SETBACK SUBJECT TO SURVEY
	ARCHEOLOGICAL AREAS RESERVED FROM MINING
	WETLAND



Subject: TIL Fast-track hui with Te Kooraha Marae Trustees
Location: Jet Park Hotel (201 Airport Road, Hamilton Waikato 3282, New Zealand)

Start: Thu 11/09/2025 11:30 am
End: Thu 11/09/2025 2:30 pm

Recurrence: (none)

Meeting Status: Accepted

Organizer: Harach, Olivia OH

From: Harach, Olivia OH [REDACTED]
Sent: Wednesday, 25 June 2025 2:25 pm
To: Holly-Marie Rearic; Stephanie de Groot
Subject: FW: Invitation to Kawhia Tanaga, Aotea Whenua and Whaingaroa Moana to meet or provide written feedback – Taharoa Ironsands Limited Fast-track Applications
Attachments: Consultation letter to Kāwhia Tangata, Aotea Whenua and Whaingaroa Moana dated 24 June 2025.pdf



Olivia Harach
Taharoa Ironsands Ltd

P [REDACTED]
E [REDACTED]

From: Harach, Olivia OH
Sent: Wednesday, 25 June 2025 2:12 pm
To: [REDACTED]
Cc: Coffey, Wayne WC [REDACTED]
Subject: Invitation to Kawhia Tanaga, Aotea Whenua and Whaingaroa Moana to meet or provide written feedback – Taharoa Ironsands Limited Fast-track Applications

Good afternoon Glenn

Please see the **attached** letter in relation to applications that TIL is preparing for the Central and Southern Block Project and Northern Block Project under the Fast-track Approvals Act 2024.

The purpose of the letter is to offer you the opportunity to discuss the applications with TIL and/or for you to provide your written feedback on the applications, as a MACA applicant.

Please let me know if you have any queries.

Regards
Wayne



Taharoa Ironsands Ltd

24 June 2025

BY EMAIL: [REDACTED]

Kāwhia Tangata, Aotea Whenua and Whaingaroa Moana
C/- Glenn Totill

Dear Glenn

Taharoa Ironsands Limited – Fast-track Approvals Act 2024 applications

1. As you know, Taharoa Ironsands Limited (**TIL**) owns and operates the Taharoa Ironsand Mine which has been in operation since 1973 and accesses the largest iron sand deposit in New Zealand.
2. The Mine is divided into blocks known as the Northern, Central and Southern Block which are all located on Taharoa C Block, as well as the Eastern Blocks and the Te Mania Extension which are located on adjoining land.
3. TIL needs to replace its resource consents relating to the Central and Southern Blocks to continue operating the existing Mine and to enable expansion of the Mine in the future. TIL sought to do so by making an application in 2020 under the standard resource consenting process under the Resource Management Act 1991 (**RMA**). The consenting process under the RMA was lengthy and TIL was not satisfied with the decision, which led it to appeal the decision to the Environment Court on 12 December 2024.
4. Since the appeal was filed, the Fast-track Approvals Act 2024 (**FTAA**) has been enacted. The FTAA establishes a fast-track environmental approvals regime for projects of national and regional significance in New Zealand.
5. The reconsenting of the Central and Southern Blocks of the Mine has been recognised by the Government as having regional and national significance and has been directly referred to utilise the Fast-Track approval process. The FTAA therefore provides an alternative, and suitable, consenting pathway for the Central and Southern Blocks. New mining in the Northern Block has also been directly referred by the Government to utilise the Fast-track process on account of its regional and national significance.
6. We are now preparing our substantive applications for both projects which will be considered under the FTAA. We are intending to file both applications with the Environmental Protection Agency in June/July 2025. Enviser is managing the preparation of the applications on behalf of TIL with input from a range of technical consultants, including Grant Eccles (planner) of Tonkin & Taylor Limited. Tonkin & Taylor has provided a high-level summary of each application in **Appendix A**.
7. We have identified that you have sought recognition of your customary interests under the Marine and Coastal Area (Takutai Moana) Act 2011. We are writing to provide you with an opportunity to discuss the applications with us, or otherwise provide written feedback, while they are being prepared.
8. We are looking to arrange meetings to discuss the applications as soon as possible. Otherwise, we would appreciate any written feedback is provided by 11 July 2025.

9. If you would like to provide written feedback or discuss the applications with us, can you please let us know using the following email address: [REDACTED]

Yours faithfully



Wayne Coffey
Managing Director and CEO of Taharoa Ironsands Limited

Appendix A

Taharoa Ironsands Mine – Project summary for pre-application consultation

- **Northern Block Mining Project**
- **Central and Southern Block Mining Project**

1 Overview

Taharoa Ironsands Limited (TIL) operate an iron sand mine at Taharoa, on the West Coast of the North Island, approximately 8 km south of Kawhia Harbour. The Taharoa Mine has been in operation since 1973 (owned by New Zealand Steel until 2017). The mine site covers an area of approximately 1,300 hectares, primarily on Māori land legally described as the Taharoa C Block and the part of the coastal marine area (CMA) legally defined as Port Taharoa (**mine**).

For the purposes of mining activity, Taharoa C Block is divided into blocks. As shown on the attached plan:

- (a) the area of the site to the north of the Mitiwai Stream is known as the Northern Block.
- (b) the area of the site between the Mitiwai Stream and the Wainui Stream is known as the Central Block; and
- (c) the area of the site to the south of the Wainui Stream is known as the Southern Block.

The Central and Southern Blocks are currently operated under a suite of resource consents granted in 2006.¹ Mining activity has not historically occurred in the Northern Block.

TIL is now preparing applications for the necessary resource consents, wildlife permits and archaeological authorities under the Fast-track Approvals Act 2024 (FTAA) to authorise:

- the extraction of sand (and associated activities) on the Northern Block (known as the Northern Block Mining Project); and
- the continuation of sand extraction (and associated activities which support the entire mine, including its export operation) on the Central and Southern Blocks and in the CMA (known as the Central and Southern Block Mining Project).

The following describes the proposed mining and associated works which are subject to the applications, details the resource consents and approvals sought and provides a high-level summary of the potential effects on the environment of each project at this stage. As the applications are currently being prepared, this information is based on the work completed as of 01 May 2025, and is subject to change.

¹ TIL also hold separate resource consents for mining of (i) the “Eastern Block” granted in 2018 (mining now completed and rehabilitation underway), and (ii) the “Te Mania Extension” adjoining the Eastern Block granted in 2022 (mining yet to commence), and (iii) a small area in the Northern Block known as “Pit 1” granted in late 2024 (mining currently in progress). Mining at these locations relies on the water take resource consents and the coastal permits granted for the Central and Southern Blocks.

2 Description of proposed works

TIL propose to mine ironsand throughout the Northern, Central and Southern Blocks excluding areas where mining restrictions will apply. The areas where mining activity will not take place are within 100 m of Mean High Water Springs, 30 m of perennial water bodies (Mitiwai Stream, Wainui Stream and Lake Taharoa), and within already identified urupa and archaeological re-interment areas on the mine. Other mining exclusion areas may be identified as part of the completion of technical assessments that are currently underway. Any additional mining exclusion areas that are identified by the technical assessments will be included in the substantive FTAA applications.

Whilst the process to extract, process and export the ironsand can and does vary depending on the nature of the deposit being mined at the time, it follows the same broad steps. These activities, which are sought to be authorised as part of the Central and Southern Block Project, include:

1. **Vegetation, topsoil and overburden removal, including harvesting of trees with commercial value (pines).** Useful native species are removed prior to stripping of topsoil for use in the eco-sourced nursery on site. Topsoil is stockpiled on-site for use in future rehabilitation activities.
2. **Extraction and processing of Ironsand.** Raw Ironsand is extracted using various methods and equipment depending on ground conditions. In upper layers, standard earthmoving machinery such as excavators, bulldozers, and trucks are used to collect the ironsand and deposit it into a Dry Mining Unit (DMU). The DMU mixes the ironsand with water to form a slurry, which is then pumped to a treatment plant for titanomagnetite extraction.
3. During this process, groundwater and surface water may enter the active excavation area. To maintain dry working conditions, this water may be pumped out as required. However, as mining progresses to deeper layers, maintaining a dry pit may become impractical. In such cases, a cutter-suction dredge is used in a water-filled pond. The dredge floats on the water and uses a submerged dredge head to cut, fluidise, and pump the Ironsand slurry through a pipeline to the treatment plant. The dredge is capable of operating at depths of 8 to 15 meters below the pond surface. In some instances, a long-reach excavator may also be used to extract material from within the pond.
4. **Processing.** The extracted ironsand is transported to a centralised processing plant where it is concentrated and processed. The ironsand is refined using screening and gravity separation. The ironsand is mixed into a slurry and pumped through a seabed pipeline to a bulk carrier ship moored at the Port of Taharoa. The export pipelines run from the processing and storage facility located on land to a Single Buoy Mooring (SBM), located approximately 3.5 km offshore.
5. **Ship loading and dewatering.** Bulk carrier ships moor at the SBM to receive the ironsand in slurry form from the export pipelines. Each ship contains dewatering equipment and the resulting freshwater, containing residual fine suspended material (inert, inorganic geological material) that is removed from the ironsand slurry, is discharged from the ship to the sea. The discharge forms a buoyant plume that floats on the seawater surface before dispersal and dilution. Ship loading operations are currently undertaken approximately 20 times per year and will increase in frequency in future as production increases up to a projected maximum of 35 times per year. Each ship loading activity takes approximately 90 hours (of pumping time) however weather conditions have an influence on loading timeframes.

6. **Tailings disposal and rehabilitation of mined areas.** The tailings (ferrous and non-ferrous sand, silts and clays) which are separated from the exportable product are pumped as a slurry to tailings disposal areas. The discharged slurry dewateres by gravity, with the drainage water collected and directed into a settlement pond or ponds. Once the tailings have dewatered, mechanical plant (excavators and dozers) redistribute the material to form the grade and levels required by the rehabilitation plan for that area. Following this the land may be stabilised, top soiled and replanted.

To operate the mine, the process requires the abstraction of water from the Wainui Stream via a constructed dam incorporating a fish pass, and the discharge of stormwater to the Wainui Stream and the discharge of process water to settling ponds. Excess stormwater and process water is discharged to the CMA via the ship loading pipelines.

The activities sought to be authorised as part of the Northern Block Mining Project include (but are not limited to):

- (a) vegetation, topsoil and overburden removal, and excavation and processing of iron sand above and below the water table (as above);
- (b) the transportation of that product via temporary pipelines to the established processing plant on the Central and Southern Block;
- (c) processing (as above);
- (d) discharge of process water to land; and
- (e) tailing disposal and rehabilitation of mined areas (as above).

The Northern Block Mining Project will rely on / be supported by the processing infrastructure located on the Central and Southern Blocks. It will also rely on / be supported by the consents being sought for the Central and Southern Block to take and use water from the Wainui Stream, discharge of stormwater to the Wainui Stream and the CMA, discharge of process water to the CMA and transport of processed product from the processing facility through the ship-loading pipelines to the CMA. No changes are being proposed to the existing water take limits and discharge limits to facilitate mining of the Northern Block.

3 Approvals sought

3.1 Resource Management Act 1991

A summary of the resource consents that are required for the Northern, Central and Southern Blocks is set out below.

3.1.1 Resource consents required for the Northern Block

National Environmental Standard for Freshwater 2020 – consents to clear vegetation and undertake earthworks within and within 10m of a natural inland wetland. Consents are also required to take, use, dam, or divert water within and within 100 m of a natural inland wetland and to discharge water within and within 100 m of a natural inland wetland.

National Environmental Standard for Commercial Forestry 2017 – consent to harvest pine trees within Class 8e land.

Operative Waikato Regional Plan – consents for soil disturbance and vegetation clearance activities, diversion and taking of groundwater and surface of water associated with mining above and below the water table, discharge of a contaminant to land or water (process water and placement of tailings) and for overburden disposal to land.

Additionally, resource consent is required under the Operative Waitomo District Plan for the potential disturbance of archaeological sites recorded in the Plan - this consent applies to the Northern Block only given that mining has occurred since the early 1970's on the Central and Southern Blocks.

3.1.2 Resource consents required for the Central and Southern Blocks

The resource consents set out above are also required for the Central and Southern Blocks.² In addition, the following resource consents are required for the Central and Southern Blocks Project:

Operative Waikato Regional Plan – consents for the damming, diversion and taking of surface water and groundwater, for stream bed disturbance, and for the discharge of stormwater to surface water.

Operative and Proposed Waikato Regional Coastal Plans – consents for the use and occupation of the Coastal Marine Area by the export pipelines and the SBM, for discharges to and depositions in the CMA from shiploading activities, and for the discharge of stormwater from the export pipelines.

3.2 Wildlife Act 1953

A wildlife permit will be required to manage lizards if they are identified prior to vegetation removal or ground disturbance works.

3.3 Heritage New Zealand Pouhere Taonga Act 2014

Archaeological authorities will be sought due to the potential for currently undiscovered archaeological features to be disturbed by mining activities (excluding urupa and archaeological areas reserved from mining which will not be disturbed).

4 Benefits of the Projects

The continuation of the mining activity on the Taharoa C Block that will be facilitated by the approvals sought under the FTAA will generate significant regional and national benefits. The Central and Southern Block Mining Project and Northern Block Project will directly contribute billions to the New Zealand economy (through employment, income for landowners, business for regional supplies and the payment of taxes).

The mine provides significant employment opportunities for the community, particularly local Māori. Over 82% of income earned by local Ngāti Mahuta comes from employment at the mine. TIL has a core workforce of 170-80 people but employs upwards of 300 staff and contractors.

TIL relies on locally sourced goods and services including the supply of electricity and services from surrounding areas including Kawhia, Te Kuiti, Otorohanga, Te Awamutu and Hamilton. TIL also relies on specialist sub-contractor support including the maintenance and management of specialised mine machinery and equipment. The support TIL relies on (and will continue to rely on) from

² Excluding the resource consent required for archaeological site disturbance.

surrounding centres for the Northern Block Project and Central and Southern Block Mining Project will inject billions into the local economy over the life of the consents sought for the Project.

The mine also provides essential benefits to the local Taharoa Village which was established around the mine and exists today because of the substantial financial contribution the mine makes every year.

5 Summary of potential adverse effects on the environment

The following high-level summary of effects on the environment is based on technical assessments previously completed in relation to mining of the Central and Southern blocks. These assessments are currently being updated, and additional assessments are being completed for mining of the Northern Block. A full assessment of effects supported by technical assessments will be included in the applications for the Northern and Central/Southern Blocks respectively.

5.1 Effects common to the Northern, Central and Southern Blocks

5.1.1 Effects on terrestrial ecology (including bats, birds, lizards)

Disturbance from mining activities has the potential to have adverse effects on wetland and grassland bird species. The loss of existing grassland due to the mining activity may also result in potential injury or death of various threatened native skink present in low numbers in the grassland. The overall level of effect on terrestrial ecology has been assessed as being **low** with the provision of an over-arching Environmental Management Plan (EMP), including an Avifauna Management Plan, Bat Management Plan and a Lizard Management Plan, and imposition of appropriate conditions such as a requirement for there to be a 30 m planting buffer around all natural water bodies. Subject to the imposition of conditions, the overall level of effects on terrestrial ecology has been assessed as **minor**.

5.1.2 Effects of mining below the water table

When mining activity interacts with groundwater there may be the potential for adverse effects on surface freshwater bodies if there is a hydraulic connection between the groundwater and surface water. This connection will be carefully monitored. Any adverse effects on the primary freshwater bodies on the site (the Mitiwai Stream and the Wainui Stream) can be avoided and mitigated through consent conditions including for example, requirements to maintain a minimum flow within the streams.

5.1.3 Effects of discharge to land

The discharge of tailings and surplus process water to land has the potential to cause adverse effects on landform, groundwater and nearby waterways. The tailings material is re-formed as close as practicable to the original landform. The discharge of surplus process water does not result in contamination of groundwater due to the natural filtering provided by the sandy ground conditions. Overall, the adverse effects of discharges to land have been assessed as **less than minor**.

5.1.4 Land disturbance effects

The mining operation is located in a high-risk erosion area and the mining and stockpiling of iron sand has the potential to result in adverse effects on land stability. Given that the mine has a good operational history with no erosion issues requiring mitigation, a rehabilitation process and

revegetation plan is followed for disturbed areas, and perennial waterbody mining setbacks are imposed, any adverse effects can be considered **negligible**.

5.1.5 Archaeological effects

Taharoa C Block is and has always been Māori land which means that there is elevated potential for accidental discovery of koi iwi and other taonga in the dune environment of the area. Ngāti Mahuta derived tikanga and protocols apply when discoveries of koiwi and taonga occur in the Taharoa dune environment as a result of mining activity, and that tikanga/protocol is reflected in existing and proposed consent conditions. Defined urupā are located within the dune system where accidentally discovered koiwi are interred with appropriate tikanga being observed. A buffer in which no mining occurs is observed around each urupā.

All of these measures and practices will continue and mitigate the potential adverse effects in relation to archaeology to **less than minor** levels.

5.1.6 Cultural effects

In considering cultural effects, it is important to note the cultural benefits the ongoing operation of the mine has for Ngati Mahuta as tangata whenua. These benefits include employment benefits, royalties, and support for the local community. Ngati Mahuta, though the Taharoa C Block Incorporation, own the land on which the mine operates and is paid significant royalties from the mine. The mine also supports the employment and growth of Ngati Mahuta whanau. The local employment opportunity generated by the mine has allowed the local community to retain members of the community who may have otherwise moved away to seek employment elsewhere and lost their connection to the land.

TIL understand the views of the respective Taharoa Marae and Te Runanga in relation to the potential cultural effects of the Central and Southern Block Project. In summary, at a high-level:

The damming of the Wainui Stream has the potential to have adverse effects on the health of Lake Taharoa and its indigenous fishery, an important matter to Ngāti Mahuta. The maintenance of the effectiveness of the fish pass at the dam in the Wainui Stream is important to ensure the presence of indigenous fish species in the stream and lake upstream of the dam continues.

The maintenance and monitoring of baseflow in the Mitiwai Stream is also an important matter from a cultural perspective. TIL has engaged expert consultants to monitor the stream to ensure that TIL understands the potential effects of its mining activity on the Stream, which will be managed through consent conditions. Rehabilitation of the mine site to a sustainable landform and land cover is also an important matter to Ngāti Mahuta. Representatives of Ngāti Mahuta have shared their desire for the land to be returned to its natural state following mining activity (being rolling sand dunes with some pockets of vegetation). In that regard, TIL has developed and is implementing an overall Site Rehabilitation Plan and updated Conceptual Site Closure Plan in place to be implemented in the event that the mine closes in the future.

TIL propose to consult with the respective Taharoa Marae and Te Runanga in the preparation of the various management plans that govern the management of effects at the mine. Such consultation and engagement benefits both parties – TIL will gain the benefit of access to the skills and expertise that reside within the marae and hapu whanau, while marae and hapu whanau will have the opportunity to influence the content of management plans that will play an important part in managing the ongoing effects of the mining activity. TIL will also propose the provision of a website

which includes monthly monitoring records to communicate data to mana whenua and the community.

5.1.7 Air Quality Effects

The mine is located in an isolated location subject to extreme westerly winds. In this environment, there is potential for wind-blown sand from the mine site to generate adverse effects on adjoining and adjacent sites to the mine, including in Taharoa Village. TIL implement a range of avoidance and mitigation techniques to control such emissions including the erection of fencing to trap sand particles, placing ground cover (for example, coconut matting) on exposed areas, using mobile and automated fixed watering systems on internal site roads, enforcing vehicle speed limits, and progressively rehabilitating mined out areas. These measures mean that the mine site can operate in accordance with the relevant permitted activity rule of the Waikato Regional Plan with regards to air quality. TIL proposes to implement a Dust Management Plan to manage the implementation of these dust prevention mechanisms. Although there remains the potential for off-site discharges of dust due to the coastal environment, these discharges are highly unlikely to result in adverse effects to human health. Acoustic Effects

The mining activities have the potential to have adverse noise effects on key sensitive receptors on sites adjoining the Northern Block (1891 Taharoa Road, 1891A Taharoa Road, Te Kōraha Marae and 25 Rotopuhoe Road). However, these receptors are located several hundred metres from where mining will occur on the Northern Block and given this separation distance, it is expected that the works will be able to be managed to comply with the Waitomo District Plan daytime and nighttime noise limits. As a result, any potential adverse effects from noise from mining on the Northern Block on sensitive receivers is expected to be **less than minor**.

Mining on the Central and Southern Blocks has been continuous since the 1970s and benefits from existing use rights with respect to noise levels and associated acoustic effects. Notwithstanding this, noise levels are expected to be compliant with District Plan noise limits. TIL will continue to adopt the best practicable option to ensure that the emission of noise from these blocks does not exceed a reasonable level for any nearby sensitive receptors.

5.2 Effects relating to the Central and Southern Blocks only

5.2.1 Effects of damming Wainui Stream

Authorisation of the dam in the Wainui Stream will result in a similar water regime to what is currently present. Fish passage will be provided for via the monitoring and maintenance of a fish pass which achieves the intended purpose of allowing grey mullet and other targeted species to be able to navigate upstream to Lake Taharoa. The downstream migration of juvenile native fish can be adequately addressed through consent conditions which include the retention of a minimum flow within the fish pass and downstream of the dam, as well as monitoring of fish pass performance. As a result, the effects of the dam on fish passage has been assessed as **negligible**.

5.2.2 Effects on water quantity

Water is extracted from the impounded section of the Wainui Stream for mining and shiploading processes. Separate water take consents are held for the mining and shiploading takes and the consents cannot be exercised at the same time. The mine is currently operating within the historically consented limits for water abstraction and no further water quantity is required for the continued operation of the mine. The Wainui Stream catchment is not over-allocated and there are

no permits held by any other party to take water from the stream. As a result, adverse water quantity effects are avoided.

5.2.3 Effects of water take on marginal wetlands

The proposed water takes have the potential to have adverse effects on marginal wetlands around the edges of Lake Taharoa. Noting that the wetlands have acclimated to the lake levels that have been experienced since the installation of the dam in the Wainui Stream in the early 1970's, the magnitude of these effects has been assessed as **low** given that the water takes will be operated in a similar manner to what has been historically occurred at the mine. Importantly, TIL is proposing to retain existing conditions that require water takes to cease if the lake levels reach a certain minimum point. Conditions will also be proposed that require ongoing monitoring of the lake margin wetlands and management responses to be implemented if the lake level remains low for an extended period and the wetlands show signs of stress (other than that caused by natural seasonal conditions).

5.2.4 Effects on benthic fauna

The proposed ship-loading infrastructure including pipelines on the seabed and the tethering mechanism for the SBM will continue to occupy part of the seabed and impact on a small amount of available subtidal sandflat habitat. Given the small percentage of the available subtidal sandflat habitat this represents, this is assessed as having a low magnitude of effect on benthic ecology. The effects of constructing the pipeline have also been assessed as being **low**.

5.2.5 Effects on fish and seafood species

The discharge from the ship loading process has the potential to have adverse effects on existing habitat for fish and seafood species. Given the relatively infrequent and short-term nature of the discharge and the highly mobile nature of fish species the potential adverse effects are assessed as **negligible**. The presence of green lipped mussels in the area of the discharge indicates that ongoing ship loading discharges do not inhibit mussel colonisation and has a **negligible** effect on seafood resource species.

5.2.6 Effects on marine mammals

A number of marine mammal species can be present in the wider marine area around Port Taharoa such as Māui dolphins, common dolphins, southern right whales and Orca/killer whales. Given the low level of risk posed by the ship loading operation and the fact that it has been occurring in the vicinity since the early 1970's, the overall risk of adverse effects for marine mammals is assessed as **negligible**. Nevertheless, to recognise the sensitivity of the marine mammals that traverse the area, TIL propose conditions that require an underwater noise survey to be undertaken if 35 ship visits occur in a 12 month period, in order to inform best practice underwater noise measures.

5.2.7 Effects on coastal processes

TIL seeks to continue the ability to discharge up to 75,000m³ per day of ship loading water, including freshwater and fine sediment, up to a maximum of 7,500,000m³ per year. As a result of dilution and dispersion of the sediment plume provided by oceanic conditions, the effect of this discharge on coastal processes has been assessed as being **less than minor**.

5.2.8 Effects of discharges in the Coastal Marine Area (CMA)

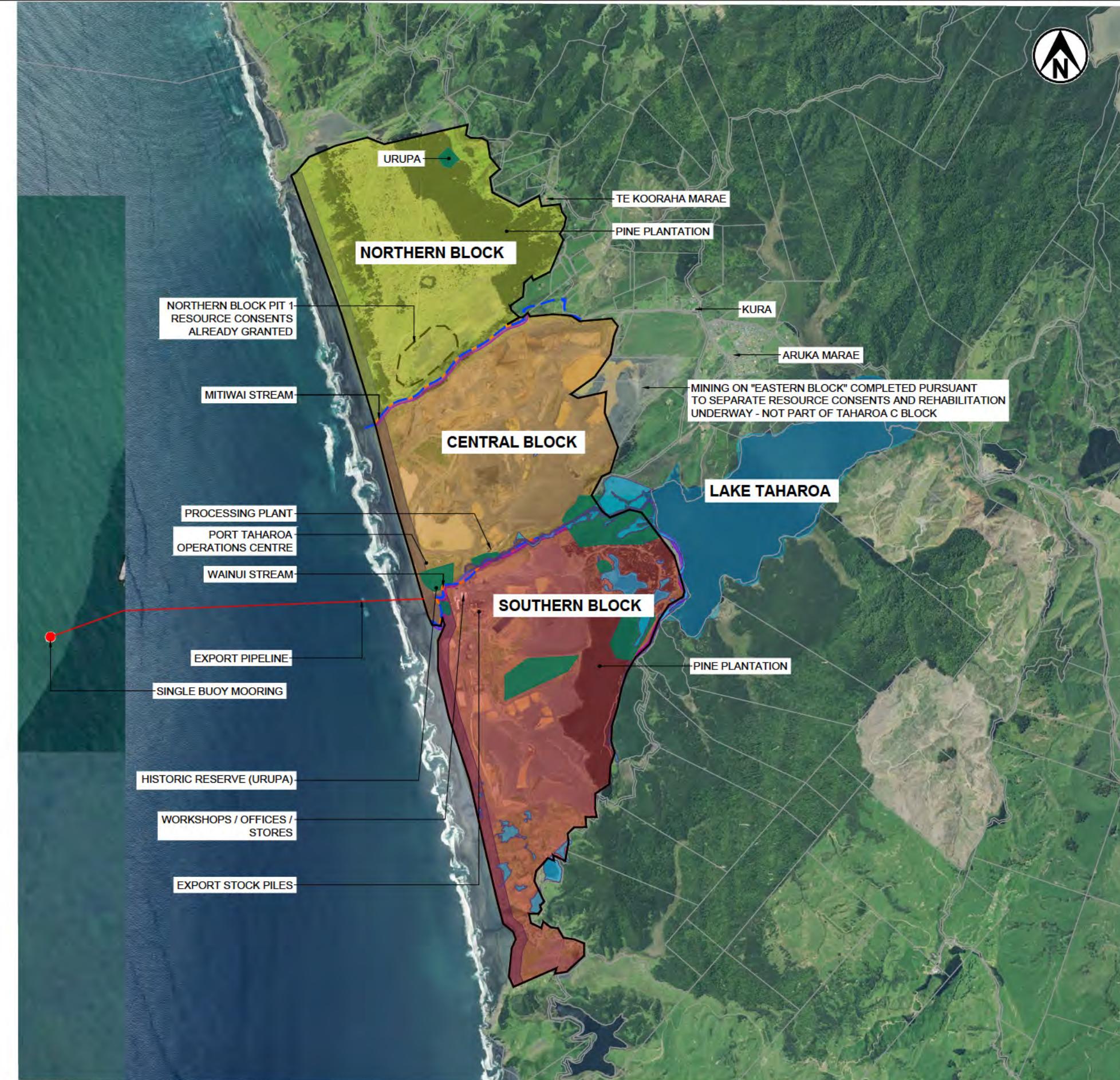
The potential adverse effects of the sediment discharge from the ship-loading events have been addressed above. The discharge includes some trace levels of naturally occurring contaminants in the ironsand that is pumped in slurry form into the ship. Because of the extremely low levels of the naturally occurring contaminants, and the dilution provided by the sea water, the discharge will not result in any measurable toxicity effect on benthic fauna.

TIL is seeking consent to continue to discharge excess process water and stormwater to the CMA at a rate of 32,000m³/day. This discharge occurs infrequently and when there is no suitable alternative to provide for the discharge on land - primarily at times of prolonged heavy rainfall. The potential ecological effects from the process water/stormwater discharge are likely to be even less than those of the ship loading discharge which were assessed to be less than minor. Correspondingly, no further actions to avoid, remedy or mitigate potential effects from the process wastewater and stormwater discharges are required apart from monitoring of the discharge quality and composition.

5.2.9 Effects on navigation safety

The continued ship movements to and from the Port of Taharoa and the occupation of the CMA by ship loading infrastructure have the potential to have adverse effects on navigational safety of other users of the CMA. However, the use of this area for recreational watercraft and commercial vessels is infrequent and the movement of ironsand export ships has been established in the area since the early 1970's. No more than one ship can access the mooring buoy at one time. Furthermore, the Port of Taharoa is operated in compliance with the New Zealand Port and Harbour Marine Safety Code, the Harbourmaster previously had no objection to the continued activity and several improvements have been implemented since the granting of the now expired resource consents in 2002. For these reasons, potential adverse effects on navigation safety have been assessed as **less than minor**.

LEGEND	
	STREAM
	PROPERTY BOUNDARIES
	MINING LICENCE AREA (TAHAROA C BLOCK)
	NORTHERN BLOCK
	CENTRAL BLOCK
	SOUTHERN BLOCK
	30m PERENNIAL WATER BODY / STREAM SETBACK
	100m MHWS SETBACK SUBJECT TO SURVEY
	ARCHEOLOGICAL AREAS RESERVED FROM MINING
	WETLAND



From: Harach, Olivia OH [REDACTED]
Sent: Wednesday, 25 June 2025 2:24 pm
To: Holly-Marie Rearic; Stephanie de Groot
Subject: FW: Invitation to Ngati Apakura to meet or provide written feedback – Taharoa Ironsands Limited Fast-track Applications
Attachments: Consultation letter to Ngati Apakura dated 24 June 2025.pdf



Olivia Harach
Taharoa Ironsands Ltd
P [REDACTED]
E [REDACTED]

From: Harach, Olivia OH
Sent: Wednesday, 25 June 2025 2:11 pm
To: admin@ngatiapakura.co.nz; [REDACTED]
Cc: Coffey, Wayne WC [REDACTED]
Subject: Invitation to Ngati Apakura to meet or provide written feedback – Taharoa Ironsands Limited Fast-track Applications

Good afternoon

Please see the **attached** letter in relation to applications that TIL is preparing for the Central and Southern Block Project and Northern Block Project under the Fast-track Approvals Act 2024.

The purpose of the letter is to offer you the opportunity to discuss the applications with TIL and or for you to provide your written feedback on the applications, as a MACA applicant.

Please let me know if you have any queries.

Regards
Wayne



Taharoa Ironsands Ltd

24 June 2025

BY EMAIL: [REDACTED]

Ngati Apakura
C/- Hori (George) Griggs

Taharoa Ironsands Limited – Fast-track Approvals Act 2024 applications

1. Taharoa Ironsands Limited (**TIL**) owns and operates the Taharoa Ironsand Mine which has been in operation since 1973 and accesses the largest ironsand deposit in New Zealand.
2. The Mine is divided into blocks known as the Northern, Central and Southern Block which are all located on Taharoa C Block, as well as the Eastern Blocks and the Te Mania Extension which are located on adjoining land.
3. TIL needs to replace its resource consents relating to the Central and Southern Blocks to continue operating the existing Mine and to enable expansion of the Mine in the future. TIL sought to do so by making an application in 2020 under the standard resource consenting process under the Resource Management Act 1991 (**RMA**). The consenting process under the RMA was lengthy and TIL was not satisfied with the decision, which led it to appeal the decision to the Environment Court on 12 December 2024.
4. Since the appeal was filed, the Fast-track Approvals Act 2024 (**FTAA**) has been enacted. The FTAA establishes a fast-track environmental approvals regime for projects of national and regional significance in New Zealand.
5. The reconsenting of the Central and Southern Blocks of the Mine has been recognised by the Government as having regional and national significance and has been directly referred to utilise the Fast-Track approval process. The FTAA therefore provides an alternative, and suitable, consenting pathway for the Central and Southern Blocks. New mining in the Northern Block has also been directly referred by the Government to utilise the Fast-track process on account of its regional and national significance.
6. We are now preparing our substantive applications for both projects which will be considered under the FTAA. We are intending to file both applications with the Environmental Protection Agency in June/July 2025. Enviser is managing the preparation of the applications on behalf of TIL with input from a range of technical consultants, including Grant Eccles (planner) of Tonkin & Taylor Limited. Tonkin & Taylor has provided a high-level summary of each application in **Appendix A**.
7. We have identified that you have sought recognition of your customary interests under the Marine and Coastal Area (Takutai Moana) Act 2011. We are writing to provide you with an opportunity to discuss the applications with us, or otherwise provide written feedback, while they are being prepared.
8. We are looking to arrange a meeting to discuss the applications as soon as possible. Otherwise, we would appreciate that any written feedback is provided by 11 July 2025.
9. If you would like to provide written feedback or discuss the applications with us, can you please let us know using the following email address: [REDACTED]

Yours faithfully



Wayne Coffey
Managing Director and CEO of Taharoa Ironsands Limited

Copy to:

Emma Whiley, Bennion Law A small, solid black rectangular box used to redact a recipient's name.

Appendix A

Taharoa Ironsands Mine – Project summary for pre-application consultation

- **Northern Block Mining Project**
- **Central and Southern Block Mining Project**

1 Overview

Taharoa Ironsands Limited (TIL) operate an iron sand mine at Taharoa, on the West Coast of the North Island, approximately 8 km south of Kawhia Harbour. The Taharoa Mine has been in operation since 1973 (owned by New Zealand Steel until 2017). The mine site covers an area of approximately 1,300 hectares, primarily on Māori land legally described as the Taharoa C Block and the part of the coastal marine area (CMA) legally defined as Port Taharoa (**mine**).

For the purposes of mining activity, Taharoa C Block is divided into blocks. As shown on the attached plan:

- (a) the area of the site to the north of the Mitiwai Stream is known as the Northern Block.
- (b) the area of the site between the Mitiwai Stream and the Wainui Stream is known as the Central Block; and
- (c) the area of the site to the south of the Wainui Stream is known as the Southern Block.

The Central and Southern Blocks are currently operated under a suite of resource consents granted in 2006.¹ Mining activity has not historically occurred in the Northern Block.

TIL is now preparing applications for the necessary resource consents, wildlife permits and archaeological authorities under the Fast-track Approvals Act 2024 (FTAA) to authorise:

- the extraction of sand (and associated activities) on the Northern Block (known as the Northern Block Mining Project); and
- the continuation of sand extraction (and associated activities which support the entire mine, including its export operation) on the Central and Southern Blocks and in the CMA (known as the Central and Southern Block Mining Project).

The following describes the proposed mining and associated works which are subject to the applications, details the resource consents and approvals sought and provides a high-level summary of the potential effects on the environment of each project at this stage. As the applications are currently being prepared, this information is based on the work completed as of 01 May 2025, and is subject to change.

¹ TIL also hold separate resource consents for mining of (i) the “Eastern Block” granted in 2018 (mining now completed and rehabilitation underway), and (ii) the “Te Mania Extension” adjoining the Eastern Block granted in 2022 (mining yet to commence), and (iii) a small area in the Northern Block known as “Pit 1” granted in late 2024 (mining currently in progress). Mining at these locations relies on the water take resource consents and the coastal permits granted for the Central and Southern Blocks.

2 Description of proposed works

TIL propose to mine ironsand throughout the Northern, Central and Southern Blocks excluding areas where mining restrictions will apply. The areas where mining activity will not take place are within 100 m of Mean High Water Springs, 30 m of perennial water bodies (Mitiwai Stream, Wainui Stream and Lake Taharoa), and within already identified urupa and archaeological re-interment areas on the mine. Other mining exclusion areas may be identified as part of the completion of technical assessments that are currently underway. Any additional mining exclusion areas that are identified by the technical assessments will be included in the substantive FTAA applications.

Whilst the process to extract, process and export the ironsand can and does vary depending on the nature of the deposit being mined at the time, it follows the same broad steps. These activities, which are sought to be authorised as part of the Central and Southern Block Project, include:

1. **Vegetation, topsoil and overburden removal, including harvesting of trees with commercial value (pines).** Useful native species are removed prior to stripping of topsoil for use in the eco-sourced nursery on site. Topsoil is stockpiled on-site for use in future rehabilitation activities.
2. **Extraction and processing of Ironsand.** Raw Ironsand is extracted using various methods and equipment depending on ground conditions. In upper layers, standard earthmoving machinery such as excavators, bulldozers, and trucks are used to collect the ironsand and deposit it into a Dry Mining Unit (DMU). The DMU mixes the ironsand with water to form a slurry, which is then pumped to a treatment plant for titanomagnetite extraction.
3. During this process, groundwater and surface water may enter the active excavation area. To maintain dry working conditions, this water may be pumped out as required. However, as mining progresses to deeper layers, maintaining a dry pit may become impractical. In such cases, a cutter-suction dredge is used in a water-filled pond. The dredge floats on the water and uses a submerged dredge head to cut, fluidise, and pump the Ironsand slurry through a pipeline to the treatment plant. The dredge is capable of operating at depths of 8 to 15 meters below the pond surface. In some instances, a long-reach excavator may also be used to extract material from within the pond.
4. **Processing.** The extracted ironsand is transported to a centralised processing plant where it is concentrated and processed. The ironsand is refined using screening and gravity separation. The ironsand is mixed into a slurry and pumped through a seabed pipeline to a bulk carrier ship moored at the Port of Taharoa. The export pipelines run from the processing and storage facility located on land to a Single Buoy Mooring (SBM), located approximately 3.5 km offshore.
5. **Ship loading and dewatering.** Bulk carrier ships moor at the SBM to receive the ironsand in slurry form from the export pipelines. Each ship contains dewatering equipment and the resulting freshwater, containing residual fine suspended material (inert, inorganic geological material) that is removed from the ironsand slurry, is discharged from the ship to the sea. The discharge forms a buoyant plume that floats on the seawater surface before dispersal and dilution. Ship loading operations are currently undertaken approximately 20 times per year and will increase in frequency in future as production increases up to a projected maximum of 35 times per year. Each ship loading activity takes approximately 90 hours (of pumping time) however weather conditions have an influence on loading timeframes.

6. **Tailings disposal and rehabilitation of mined areas.** The tailings (ferrous and non-ferrous sand, silts and clays) which are separated from the exportable product are pumped as a slurry to tailings disposal areas. The discharged slurry dewateres by gravity, with the drainage water collected and directed into a settlement pond or ponds. Once the tailings have dewatered, mechanical plant (excavators and dozers) redistribute the material to form the grade and levels required by the rehabilitation plan for that area. Following this the land may be stabilised, top soiled and replanted.

To operate the mine, the process requires the abstraction of water from the Wainui Stream via a constructed dam incorporating a fish pass, and the discharge of stormwater to the Wainui Stream and the discharge of process water to settling ponds. Excess stormwater and process water is discharged to the CMA via the ship loading pipelines.

The activities sought to be authorised as part of the Northern Block Mining Project include (but are not limited to):

- (a) vegetation, topsoil and overburden removal, and excavation and processing of iron sand above and below the water table (as above);
- (b) the transportation of that product via temporary pipelines to the established processing plant on the Central and Southern Block;
- (c) processing (as above);
- (d) discharge of process water to land; and
- (e) tailing disposal and rehabilitation of mined areas (as above).

The Northern Block Mining Project will rely on / be supported by the processing infrastructure located on the Central and Southern Blocks. It will also rely on / be supported by the consents being sought for the Central and Southern Block to take and use water from the Wainui Stream, discharge of stormwater to the Wainui Stream and the CMA, discharge of process water to the CMA and transport of processed product from the processing facility through the ship-loading pipelines to the CMA. No changes are being proposed to the existing water take limits and discharge limits to facilitate mining of the Northern Block.

3 Approvals sought

3.1 Resource Management Act 1991

A summary of the resource consents that are required for the Northern, Central and Southern Blocks is set out below.

3.1.1 Resource consents required for the Northern Block

National Environmental Standard for Freshwater 2020 – consents to clear vegetation and undertake earthworks within and within 10m of a natural inland wetland. Consents are also required to take, use, dam, or divert water within and within 100 m of a natural inland wetland and to discharge water within and within 100 m of a natural inland wetland.

National Environmental Standard for Commercial Forestry 2017 – consent to harvest pine trees within Class 8e land.

Operative Waikato Regional Plan – consents for soil disturbance and vegetation clearance activities, diversion and taking of groundwater and surface of water associated with mining above and below the water table, discharge of a contaminant to land or water (process water and placement of tailings) and for overburden disposal to land.

Additionally, resource consent is required under the Operative Waitomo District Plan for the potential disturbance of archaeological sites recorded in the Plan - this consent applies to the Northern Block only given that mining has occurred since the early 1970's on the Central and Southern Blocks.

3.1.2 Resource consents required for the Central and Southern Blocks

The resource consents set out above are also required for the Central and Southern Blocks.² In addition, the following resource consents are required for the Central and Southern Blocks Project:

Operative Waikato Regional Plan – consents for the damming, diversion and taking of surface water and groundwater, for stream bed disturbance, and for the discharge of stormwater to surface water.

Operative and Proposed Waikato Regional Coastal Plans – consents for the use and occupation of the Coastal Marine Area by the export pipelines and the SBM, for discharges to and depositions in the CMA from shiploading activities, and for the discharge of stormwater from the export pipelines.

3.2 Wildlife Act 1953

A wildlife permit will be required to manage lizards if they are identified prior to vegetation removal or ground disturbance works.

3.3 Heritage New Zealand Pouhere Taonga Act 2014

Archaeological authorities will be sought due to the potential for currently undiscovered archaeological features to be disturbed by mining activities (excluding urupa and archaeological areas reserved from mining which will not be disturbed).

4 Benefits of the Projects

The continuation of the mining activity on the Taharoa C Block that will be facilitated by the approvals sought under the FTAA will generate significant regional and national benefits. The Central and Southern Block Mining Project and Northern Block Project will directly contribute billions to the New Zealand economy (through employment, income for landowners, business for regional supplies and the payment of taxes).

The mine provides significant employment opportunities for the community, particularly local Māori. Over 82% of income earned by local Ngāti Mahuta comes from employment at the mine. TIL has a core workforce of 170-80 people but employs upwards of 300 staff and contractors.

TIL relies on locally sourced goods and services including the supply of electricity and services from surrounding areas including Kawhia, Te Kuiti, Otorohanga, Te Awamutu and Hamilton. TIL also relies on specialist sub-contractor support including the maintenance and management of specialised mine machinery and equipment. The support TIL relies on (and will continue to rely on) from

² Excluding the resource consent required for archaeological site disturbance.

surrounding centres for the Northern Block Project and Central and Southern Block Mining Project will inject billions into the local economy over the life of the consents sought for the Project.

The mine also provides essential benefits to the local Taharoa Village which was established around the mine and exists today because of the substantial financial contribution the mine makes every year.

5 Summary of potential adverse effects on the environment

The following high-level summary of effects on the environment is based on technical assessments previously completed in relation to mining of the Central and Southern blocks. These assessments are currently being updated, and additional assessments are being completed for mining of the Northern Block. A full assessment of effects supported by technical assessments will be included in the applications for the Northern and Central/Southern Blocks respectively.

5.1 Effects common to the Northern, Central and Southern Blocks

5.1.1 Effects on terrestrial ecology (including bats, birds, lizards)

Disturbance from mining activities has the potential to have adverse effects on wetland and grassland bird species. The loss of existing grassland due to the mining activity may also result in potential injury or death of various threatened native skink present in low numbers in the grassland. The overall level of effect on terrestrial ecology has been assessed as being **low** with the provision of an over-arching Environmental Management Plan (EMP), including an Avifauna Management Plan, Bat Management Plan and a Lizard Management Plan, and imposition of appropriate conditions such as a requirement for there to be a 30 m planting buffer around all natural water bodies. Subject to the imposition of conditions, the overall level of effects on terrestrial ecology has been assessed as **minor**.

5.1.2 Effects of mining below the water table

When mining activity interacts with groundwater there may be the potential for adverse effects on surface freshwater bodies if there is a hydraulic connection between the groundwater and surface water. This connection will be carefully monitored. Any adverse effects on the primary freshwater bodies on the site (the Mitiwai Stream and the Wainui Stream) can be avoided and mitigated through consent conditions including for example, requirements to maintain a minimum flow within the streams.

5.1.3 Effects of discharge to land

The discharge of tailings and surplus process water to land has the potential to cause adverse effects on landform, groundwater and nearby waterways. The tailings material is re-formed as close as practicable to the original landform. The discharge of surplus process water does not result in contamination of groundwater due to the natural filtering provided by the sandy ground conditions. Overall, the adverse effects of discharges to land have been assessed as **less than minor**.

5.1.4 Land disturbance effects

The mining operation is located in a high-risk erosion area and the mining and stockpiling of iron sand has the potential to result in adverse effects on land stability. Given that the mine has a good operational history with no erosion issues requiring mitigation, a rehabilitation process and

revegetation plan is followed for disturbed areas, and perennial waterbody mining setbacks are imposed, any adverse effects can be considered **negligible**.

5.1.5 Archaeological effects

Taharoa C Block is and has always been Māori land which means that there is elevated potential for accidental discovery of koi iwi and other taonga in the dune environment of the area. Ngāti Mahuta derived tikanga and protocols apply when discoveries of koiwi and taonga occur in the Taharoa dune environment as a result of mining activity, and that tikanga/protocol is reflected in existing and proposed consent conditions. Defined urupā are located within the dune system where accidentally discovered koiwi are interred with appropriate tikanga being observed. A buffer in which no mining occurs is observed around each urupā.

All of these measures and practices will continue and mitigate the potential adverse effects in relation to archaeology to **less than minor** levels.

5.1.6 Cultural effects

In considering cultural effects, it is important to note the cultural benefits the ongoing operation of the mine has for Ngati Mahuta as tangata whenua. These benefits include employment benefits, royalties, and support for the local community. Ngati Mahuta, though the Taharoa C Block Incorporation, own the land on which the mine operates and is paid significant royalties from the mine. The mine also supports the employment and growth of Ngati Mahuta whanau. The local employment opportunity generated by the mine has allowed the local community to retain members of the community who may have otherwise moved away to seek employment elsewhere and lost their connection to the land.

TIL understand the views of the respective Taharoa Marae and Te Runanga in relation to the potential cultural effects of the Central and Southern Block Project. In summary, at a high-level:

The damming of the Wainui Stream has the potential to have adverse effects on the health of Lake Taharoa and its indigenous fishery, an important matter to Ngāti Mahuta. The maintenance of the effectiveness of the fish pass at the dam in the Wainui Stream is important to ensure the presence of indigenous fish species in the stream and lake upstream of the dam continues.

The maintenance and monitoring of baseflow in the Mitiwai Stream is also an important matter from a cultural perspective. TIL has engaged expert consultants to monitor the stream to ensure that TIL understands the potential effects of its mining activity on the Stream, which will be managed through consent conditions. Rehabilitation of the mine site to a sustainable landform and land cover is also an important matter to Ngāti Mahuta. Representatives of Ngāti Mahuta have shared their desire for the land to be returned to its natural state following mining activity (being rolling sand dunes with some pockets of vegetation). In that regard, TIL has developed and is implementing an overall Site Rehabilitation Plan and updated Conceptual Site Closure Plan in place to be implemented in the event that the mine closes in the future.

TIL propose to consult with the respective Taharoa Marae and Te Runanga in the preparation of the various management plans that govern the management of effects at the mine. Such consultation and engagement benefits both parties – TIL will gain the benefit of access to the skills and expertise that reside within the marae and hapu whanau, while marae and hapu whanau will have the opportunity to influence the content of management plans that will play an important part in managing the ongoing effects of the mining activity. TIL will also propose the provision of a website

which includes monthly monitoring records to communicate data to mana whenua and the community.

5.1.7 Air Quality Effects

The mine is located in an isolated location subject to extreme westerly winds. In this environment, there is potential for wind-blown sand from the mine site to generate adverse effects on adjoining and adjacent sites to the mine, including in Taharoa Village. TIL implement a range of avoidance and mitigation techniques to control such emissions including the erection of fencing to trap sand particles, placing ground cover (for example, coconut matting) on exposed areas, using mobile and automated fixed watering systems on internal site roads, enforcing vehicle speed limits, and progressively rehabilitating mined out areas. These measures mean that the mine site can operate in accordance with the relevant permitted activity rule of the Waikato Regional Plan with regards to air quality. TIL proposes to implement a Dust Management Plan to manage the implementation of these dust prevention mechanisms. Although there remains the potential for off-site discharges of dust due to the coastal environment, these discharges are highly unlikely to result in adverse effects to human health. Acoustic Effects

The mining activities have the potential to have adverse noise effects on key sensitive receptors on sites adjoining the Northern Block (1891 Taharoa Road, 1891A Taharoa Road, Te Kōraha Marae and 25 Rotopuhoe Road). However, these receptors are located several hundred metres from where mining will occur on the Northern Block and given this separation distance, it is expected that the works will be able to be managed to comply with the Waitomo District Plan daytime and nighttime noise limits. As a result, any potential adverse effects from noise from mining on the Northern Block on sensitive receivers is expected to be **less than minor**.

Mining on the Central and Southern Blocks has been continuous since the 1970s and benefits from existing use rights with respect to noise levels and associated acoustic effects. Notwithstanding this, noise levels are expected to be compliant with District Plan noise limits. TIL will continue to adopt the best practicable option to ensure that the emission of noise from these blocks does not exceed a reasonable level for any nearby sensitive receptors.

5.2 Effects relating to the Central and Southern Blocks only

5.2.1 Effects of damming Wainui Stream

Authorisation of the dam in the Wainui Stream will result in a similar water regime to what is currently present. Fish passage will be provided for via the monitoring and maintenance of a fish pass which achieves the intended purpose of allowing grey mullet and other targeted species to be able to navigate upstream to Lake Taharoa. The downstream migration of juvenile native fish can be adequately addressed through consent conditions which include the retention of a minimum flow within the fish pass and downstream of the dam, as well as monitoring of fish pass performance. As a result, the effects of the dam on fish passage has been assessed as **negligible**.

5.2.2 Effects on water quantity

Water is extracted from the impounded section of the Wainui Stream for mining and shiploading processes. Separate water take consents are held for the mining and shiploading takes and the consents cannot be exercised at the same time. The mine is currently operating within the historically consented limits for water abstraction and no further water quantity is required for the continued operation of the mine. The Wainui Stream catchment is not over-allocated and there are

no permits held by any other party to take water from the stream. As a result, adverse water quantity effects are avoided.

5.2.3 Effects of water take on marginal wetlands

The proposed water takes have the potential to have adverse effects on marginal wetlands around the edges of Lake Taharoa. Noting that the wetlands have acclimated to the lake levels that have been experienced since the installation of the dam in the Wainui Stream in the early 1970's, the magnitude of these effects has been assessed as **low** given that the water takes will be operated in a similar manner to what has been historically occurred at the mine. Importantly, TIL is proposing to retain existing conditions that require water takes to cease if the lake levels reach a certain minimum point. Conditions will also be proposed that require ongoing monitoring of the lake margin wetlands and management responses to be implemented if the lake level remains low for an extended period and the wetlands show signs of stress (other than that caused by natural seasonal conditions).

5.2.4 Effects on benthic fauna

The proposed ship-loading infrastructure including pipelines on the seabed and the tethering mechanism for the SBM will continue to occupy part of the seabed and impact on a small amount of available subtidal sandflat habitat. Given the small percentage of the available subtidal sandflat habitat this represents, this is assessed as having a low magnitude of effect on benthic ecology. The effects of constructing the pipeline have also been assessed as being **low**.

5.2.5 Effects on fish and seafood species

The discharge from the ship loading process has the potential to have adverse effects on existing habitat for fish and seafood species. Given the relatively infrequent and short-term nature of the discharge and the highly mobile nature of fish species the potential adverse effects are assessed as **negligible**. The presence of green lipped mussels in the area of the discharge indicates that ongoing ship loading discharges do not inhibit mussel colonisation and has a **negligible** effect on seafood resource species.

5.2.6 Effects on marine mammals

A number of marine mammal species can be present in the wider marine area around Port Taharoa such as Māui dolphins, common dolphins, southern right whales and Orca/killer whales. Given the low level of risk posed by the ship loading operation and the fact that it has been occurring in the vicinity since the early 1970's, the overall risk of adverse effects for marine mammals is assessed as **negligible**. Nevertheless, to recognise the sensitivity of the marine mammals that traverse the area, TIL propose conditions that require an underwater noise survey to be undertaken if 35 ship visits occur in a 12 month period, in order to inform best practice underwater noise measures.

5.2.7 Effects on coastal processes

TIL seeks to continue the ability to discharge up to 75,000m³ per day of ship loading water, including freshwater and fine sediment, up to a maximum of 7,500,000m³ per year. As a result of dilution and dispersion of the sediment plume provided by oceanic conditions, the effect of this discharge on coastal processes has been assessed as being **less than minor**.

5.2.8 Effects of discharges in the Coastal Marine Area (CMA)

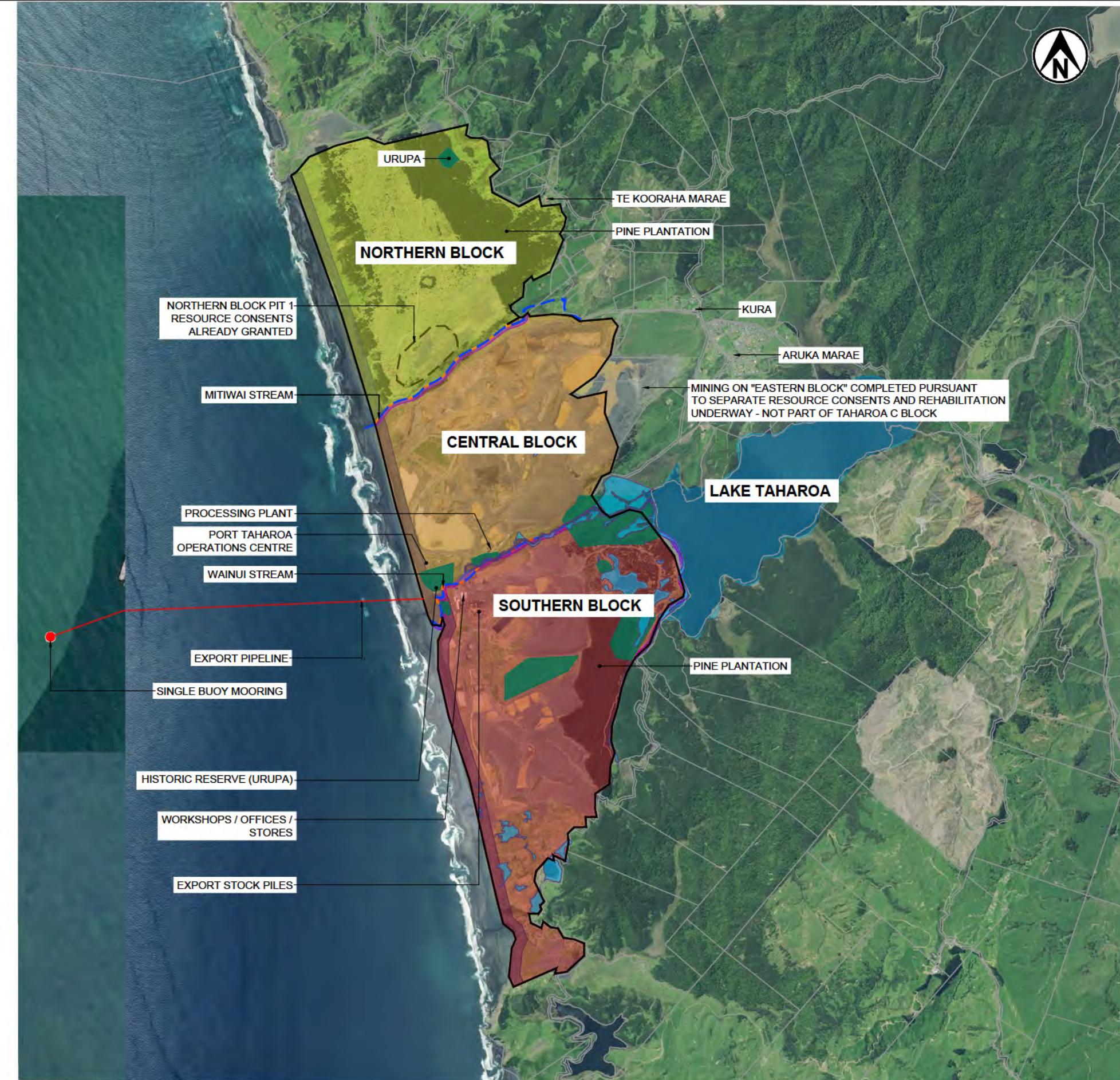
The potential adverse effects of the sediment discharge from the ship-loading events have been addressed above. The discharge includes some trace levels of naturally occurring contaminants in the ironsand that is pumped in slurry form into the ship. Because of the extremely low levels of the naturally occurring contaminants, and the dilution provided by the sea water, the discharge will not result in any measurable toxicity effect on benthic fauna.

TIL is seeking consent to continue to discharge excess process water and stormwater to the CMA at a rate of 32,000m³/day. This discharge occurs infrequently and when there is no suitable alternative to provide for the discharge on land - primarily at times of prolonged heavy rainfall. The potential ecological effects from the process water/stormwater discharge are likely to be even less than those of the ship loading discharge which were assessed to be less than minor. Correspondingly, no further actions to avoid, remedy or mitigate potential effects from the process wastewater and stormwater discharges are required apart from monitoring of the discharge quality and composition.

5.2.9 Effects on navigation safety

The continued ship movements to and from the Port of Taharoa and the occupation of the CMA by ship loading infrastructure have the potential to have adverse effects on navigational safety of other users of the CMA. However, the use of this area for recreational watercraft and commercial vessels is infrequent and the movement of ironsand export ships has been established in the area since the early 1970's. No more than one ship can access the mooring buoy at one time. Furthermore, the Port of Taharoa is operated in compliance with the New Zealand Port and Harbour Marine Safety Code, the Harbourmaster previously had no objection to the continued activity and several improvements have been implemented since the granting of the now expired resource consents in 2002. For these reasons, potential adverse effects on navigation safety have been assessed as **less than minor**.

LEGEND	
	STREAM
	PROPERTY BOUNDARIES
	MINING LICENCE AREA (TAHAROA C BLOCK)
	NORTHERN BLOCK
	CENTRAL BLOCK
	SOUTHERN BLOCK
	30m PERENNIAL WATER BODY / STREAM SETBACK
	100m MHWS SETBACK SUBJECT TO SURVEY
	ARCHEOLOGICAL AREAS RESERVED FROM MINING
	WETLAND



From: Harach, Olivia OH [REDACTED]
Sent: Wednesday, 25 June 2025 2:25 pm
To: Holly-Marie Rearic; Stephanie de Groot
Subject: FW: Invitation to the Ministry for the Environment to meet or provide written feedback – Taharoa Ironsands Limited Fast-track Applications
Attachments: Consultation letter to the Ministry for the Environment dated 24 June 2025.pdf



Olivia Harach
Taharoa Ironsands Ltd

P
E

From: Harach, Olivia OH
Sent: Wednesday, 25 June 2025 2:16 pm
To: adminagencyftaa@mfe.govt.nz
Cc: Coffey, Wayne WC [REDACTED]
Subject: Invitation to the Ministry for the Environment to meet or provide written feedback – Taharoa Ironsands Limited Fast-track Applications

Good afternoon Stephanie

Please see the attached letter in relation to applications that TIL is preparing for the Central and Southern Block Project and Northern Block Project under the Fast-track Approvals Act 2024.

The purpose of the letter is to offer MfE the opportunity to discuss the applications with TIL and/or for MfE to provide written feedback on the applications.

Please let me know if you have any queries.

Regards
Wayne



Taharoa Ironsands Ltd

24 June 2025

BY EMAIL: [REDACTED]

Attention: Stephanie Frame

Ministry for the Environment
8 Willis Street
Wellington Central
Wellington 6011

Dear Stephanie

Taharoa Ironsands Limited – Fast-track Approvals Act 2024 applications

1. Taharoa Ironsands Limited (**TIL**) owns and operates the Taharoa Ironsand Mine which has been in operation since 1973 and accesses the largest ironsand deposit in New Zealand.
2. The Mine is divided into blocks known as the Northern, Central and Southern Block which are all located on Taharoa C Block, as well as the Eastern Blocks and the Te Mania Extension which are located on adjoining land.
3. The following two projects are listed in Schedule 2 of the Fast-track Approvals Act 2024 (**FTAA**):
 - (a) Central & Southern Block Mining Project: TIL needs to replace its resource consents relating to these blocks to continue operating the existing Mine. TIL made an application under the standard resource consenting process under the Resource Management Act 1991 (**RMA**). The consenting process was lengthy and TIL was not satisfied with the decision, which led it to appeal the decision to the Environment Court on 12 December 2024. Since the appeal was filed, the FTAA has been enacted. This provides an alternative, and suitable, pathway for TIL to apply for the necessary approvals for the Central and Southern Blocks.
 - (b) Northern Block Mining Project: TIL also seeks to expand its existing operations into the Northern Block of the mining area. This project has also been directly referred by the Government to utilise the Fast-track process on account of its regional and national significance.
4. We are now preparing our substantive applications for both projects. We are intending to file the applications with the Environmental Protection Agency in June/July 2025. Enviser is managing the preparation of the applications on behalf of TIL with input from a range of technical consultants, including Grant Eccles (planner) of Tonkin & Taylor Limited. Tonkin & Taylor has provided a high-level summary of what will be sought in each application in **Appendix A**.
5. We are writing to provide you with an opportunity to discuss the applications while they are being prepared. We are otherwise open to receiving written feedback if you do not wish to meet.
6. We are looking to arrange initial meetings to discuss the applications as soon as possible. Otherwise, we would appreciate that any written feedback is provided by 11 July 2025.
7. If you would like to discuss the applications with us or provide written feedback, please let us know using the following email address: [REDACTED]

Yours faithfully



Wayne Coffey
Managing Director and CEO of Taharoa Ironsands Limited

Appendix A

Taharoa Ironsands Mine – Project summary for pre-application consultation

- **Northern Block Mining Project**
- **Central and Southern Block Mining Project**

1 Overview

Taharoa Ironsands Limited (TIL) operate an iron sand mine at Taharoa, on the West Coast of the North Island, approximately 8 km south of Kawhia Harbour. The Taharoa Mine has been in operation since 1973 (owned by New Zealand Steel until 2017). The mine site covers an area of approximately 1,300 hectares, primarily on Māori land legally described as the Taharoa C Block and the part of the coastal marine area (CMA) legally defined as Port Taharoa (**mine**).

For the purposes of mining activity, Taharoa C Block is divided into blocks. As shown on the attached plan:

- (a) the area of the site to the north of the Mitiwai Stream is known as the Northern Block.
- (b) the area of the site between the Mitiwai Stream and the Wainui Stream is known as the Central Block; and
- (c) the area of the site to the south of the Wainui Stream is known as the Southern Block.

The Central and Southern Blocks are currently operated under a suite of resource consents granted in 2006.¹ Mining activity has not historically occurred in the Northern Block.

TIL is now preparing applications for the necessary resource consents, wildlife permits and archaeological authorities under the Fast-track Approvals Act 2024 (FTAA) to authorise:

- the extraction of sand (and associated activities) on the Northern Block (known as the Northern Block Mining Project); and
- the continuation of sand extraction (and associated activities which support the entire mine, including its export operation) on the Central and Southern Blocks and in the CMA (known as the Central and Southern Block Mining Project).

The following describes the proposed mining and associated works which are subject to the applications, details the resource consents and approvals sought and provides a high-level summary of the potential effects on the environment of each project at this stage. As the applications are currently being prepared, this information is based on the work completed as of 01 May 2025, and is subject to change.

¹ TIL also hold separate resource consents for mining of (i) the “Eastern Block” granted in 2018 (mining now completed and rehabilitation underway), and (ii) the “Te Mania Extension” adjoining the Eastern Block granted in 2022 (mining yet to commence), and (iii) a small area in the Northern Block known as “Pit 1” granted in late 2024 (mining currently in progress). Mining at these locations relies on the water take resource consents and the coastal permits granted for the Central and Southern Blocks.

2 Description of proposed works

TIL propose to mine ironsand throughout the Northern, Central and Southern Blocks excluding areas where mining restrictions will apply. The areas where mining activity will not take place are within 100 m of Mean High Water Springs, 30 m of perennial water bodies (Mitiwai Stream, Wainui Stream and Lake Taharoa), and within already identified urupa and archaeological re-interment areas on the mine. Other mining exclusion areas may be identified as part of the completion of technical assessments that are currently underway. Any additional mining exclusion areas that are identified by the technical assessments will be included in the substantive FTAA applications.

Whilst the process to extract, process and export the ironsand can and does vary depending on the nature of the deposit being mined at the time, it follows the same broad steps. These activities, which are sought to be authorised as part of the Central and Southern Block Project, include:

1. **Vegetation, topsoil and overburden removal, including harvesting of trees with commercial value (pines).** Useful native species are removed prior to stripping of topsoil for use in the eco-sourced nursery on site. Topsoil is stockpiled on-site for use in future rehabilitation activities.
2. **Extraction and processing of Ironsand.** Raw Ironsand is extracted using various methods and equipment depending on ground conditions. In upper layers, standard earthmoving machinery such as excavators, bulldozers, and trucks are used to collect the ironsand and deposit it into a Dry Mining Unit (DMU). The DMU mixes the ironsand with water to form a slurry, which is then pumped to a treatment plant for titanomagnetite extraction.
3. During this process, groundwater and surface water may enter the active excavation area. To maintain dry working conditions, this water may be pumped out as required. However, as mining progresses to deeper layers, maintaining a dry pit may become impractical. In such cases, a cutter-suction dredge is used in a water-filled pond. The dredge floats on the water and uses a submerged dredge head to cut, fluidise, and pump the Ironsand slurry through a pipeline to the treatment plant. The dredge is capable of operating at depths of 8 to 15 meters below the pond surface. In some instances, a long-reach excavator may also be used to extract material from within the pond.
4. **Processing.** The extracted ironsand is transported to a centralised processing plant where it is concentrated and processed. The ironsand is refined using screening and gravity separation. The ironsand is mixed into a slurry and pumped through a seabed pipeline to a bulk carrier ship moored at the Port of Taharoa. The export pipelines run from the processing and storage facility located on land to a Single Buoy Mooring (SBM), located approximately 3.5 km offshore.
5. **Ship loading and dewatering.** Bulk carrier ships moor at the SBM to receive the ironsand in slurry form from the export pipelines. Each ship contains dewatering equipment and the resulting freshwater, containing residual fine suspended material (inert, inorganic geological material) that is removed from the ironsand slurry, is discharged from the ship to the sea. The discharge forms a buoyant plume that floats on the seawater surface before dispersal and dilution. Ship loading operations are currently undertaken approximately 20 times per year and will increase in frequency in future as production increases up to a projected maximum of 35 times per year. Each ship loading activity takes approximately 90 hours (of pumping time) however weather conditions have an influence on loading timeframes.

6. **Tailings disposal and rehabilitation of mined areas.** The tailings (ferrous and non-ferrous sand, silts and clays) which are separated from the exportable product are pumped as a slurry to tailings disposal areas. The discharged slurry dewateres by gravity, with the drainage water collected and directed into a settlement pond or ponds. Once the tailings have dewatered, mechanical plant (excavators and dozers) redistribute the material to form the grade and levels required by the rehabilitation plan for that area. Following this the land may be stabilised, top soiled and replanted.

To operate the mine, the process requires the abstraction of water from the Wainui Stream via a constructed dam incorporating a fish pass, and the discharge of stormwater to the Wainui Stream and the discharge of process water to settling ponds. Excess stormwater and process water is discharged to the CMA via the ship loading pipelines.

The activities sought to be authorised as part of the Northern Block Mining Project include (but are not limited to):

- (a) vegetation, topsoil and overburden removal, and excavation and processing of iron sand above and below the water table (as above);
- (b) the transportation of that product via temporary pipelines to the established processing plant on the Central and Southern Block;
- (c) processing (as above);
- (d) discharge of process water to land; and
- (e) tailing disposal and rehabilitation of mined areas (as above).

The Northern Block Mining Project will rely on / be supported by the processing infrastructure located on the Central and Southern Blocks. It will also rely on / be supported by the consents being sought for the Central and Southern Block to take and use water from the Wainui Stream, discharge of stormwater to the Wainui Stream and the CMA, discharge of process water to the CMA and transport of processed product from the processing facility through the ship-loading pipelines to the CMA. No changes are being proposed to the existing water take limits and discharge limits to facilitate mining of the Northern Block.

3 Approvals sought

3.1 Resource Management Act 1991

A summary of the resource consents that are required for the Northern, Central and Southern Blocks is set out below.

3.1.1 Resource consents required for the Northern Block

National Environmental Standard for Freshwater 2020 – consents to clear vegetation and undertake earthworks within and within 10m of a natural inland wetland. Consents are also required to take, use, dam, or divert water within and within 100 m of a natural inland wetland and to discharge water within and within 100 m of a natural inland wetland.

National Environmental Standard for Commercial Forestry 2017 – consent to harvest pine trees within Class 8e land.

Operative Waikato Regional Plan – consents for soil disturbance and vegetation clearance activities, diversion and taking of groundwater and surface of water associated with mining above and below the water table, discharge of a contaminant to land or water (process water and placement of tailings) and for overburden disposal to land.

Additionally, resource consent is required under the Operative Waitomo District Plan for the potential disturbance of archaeological sites recorded in the Plan - this consent applies to the Northern Block only given that mining has occurred since the early 1970's on the Central and Southern Blocks.

3.1.2 Resource consents required for the Central and Southern Blocks

The resource consents set out above are also required for the Central and Southern Blocks.² In addition, the following resource consents are required for the Central and Southern Blocks Project:

Operative Waikato Regional Plan – consents for the damming, diversion and taking of surface water and groundwater, for stream bed disturbance, and for the discharge of stormwater to surface water.

Operative and Proposed Waikato Regional Coastal Plans – consents for the use and occupation of the Coastal Marine Area by the export pipelines and the SBM, for discharges to and depositions in the CMA from shiploading activities, and for the discharge of stormwater from the export pipelines.

3.2 Wildlife Act 1953

A wildlife permit will be required to manage lizards if they are identified prior to vegetation removal or ground disturbance works.

3.3 Heritage New Zealand Pouhere Taonga Act 2014

Archaeological authorities will be sought due to the potential for currently undiscovered archaeological features to be disturbed by mining activities (excluding urupa and archaeological areas reserved from mining which will not be disturbed).

4 Benefits of the Projects

The continuation of the mining activity on the Taharoa C Block that will be facilitated by the approvals sought under the FTAA will generate significant regional and national benefits. The Central and Southern Block Mining Project and Northern Block Project will directly contribute billions to the New Zealand economy (through employment, income for landowners, business for regional supplies and the payment of taxes).

The mine provides significant employment opportunities for the community, particularly local Māori. Over 82% of income earned by local Ngāti Mahuta comes from employment at the mine. TIL has a core workforce of 170-80 people but employs upwards of 300 staff and contractors.

TIL relies on locally sourced goods and services including the supply of electricity and services from surrounding areas including Kawhia, Te Kuiti, Otorohanga, Te Awamutu and Hamilton. TIL also relies on specialist sub-contractor support including the maintenance and management of specialised mine machinery and equipment. The support TIL relies on (and will continue to rely on) from

² Excluding the resource consent required for archaeological site disturbance.

surrounding centres for the Northern Block Project and Central and Southern Block Mining Project will inject billions into the local economy over the life of the consents sought for the Project.

The mine also provides essential benefits to the local Taharoa Village which was established around the mine and exists today because of the substantial financial contribution the mine makes every year.

5 Summary of potential adverse effects on the environment

The following high-level summary of effects on the environment is based on technical assessments previously completed in relation to mining of the Central and Southern blocks. These assessments are currently being updated, and additional assessments are being completed for mining of the Northern Block. A full assessment of effects supported by technical assessments will be included in the applications for the Northern and Central/Southern Blocks respectively.

5.1 Effects common to the Northern, Central and Southern Blocks

5.1.1 Effects on terrestrial ecology (including bats, birds, lizards)

Disturbance from mining activities has the potential to have adverse effects on wetland and grassland bird species. The loss of existing grassland due to the mining activity may also result in potential injury or death of various threatened native skink present in low numbers in the grassland. The overall level of effect on terrestrial ecology has been assessed as being **low** with the provision of an over-arching Environmental Management Plan (EMP), including an Avifauna Management Plan, Bat Management Plan and a Lizard Management Plan, and imposition of appropriate conditions such as a requirement for there to be a 30 m planting buffer around all natural water bodies. Subject to the imposition of conditions, the overall level of effects on terrestrial ecology has been assessed as **minor**.

5.1.2 Effects of mining below the water table

When mining activity interacts with groundwater there may be the potential for adverse effects on surface freshwater bodies if there is a hydraulic connection between the groundwater and surface water. This connection will be carefully monitored. Any adverse effects on the primary freshwater bodies on the site (the Mitiwai Stream and the Wainui Stream) can be avoided and mitigated through consent conditions including for example, requirements to maintain a minimum flow within the streams.

5.1.3 Effects of discharge to land

The discharge of tailings and surplus process water to land has the potential to cause adverse effects on landform, groundwater and nearby waterways. The tailings material is re-formed as close as practicable to the original landform. The discharge of surplus process water does not result in contamination of groundwater due to the natural filtering provided by the sandy ground conditions. Overall, the adverse effects of discharges to land have been assessed as **less than minor**.

5.1.4 Land disturbance effects

The mining operation is located in a high-risk erosion area and the mining and stockpiling of iron sand has the potential to result in adverse effects on land stability. Given that the mine has a good operational history with no erosion issues requiring mitigation, a rehabilitation process and

revegetation plan is followed for disturbed areas, and perennial waterbody mining setbacks are imposed, any adverse effects can be considered **negligible**.

5.1.5 Archaeological effects

Taharoa C Block is and has always been Māori land which means that there is elevated potential for accidental discovery of koi iwi and other taonga in the dune environment of the area. Ngāti Mahuta derived tikanga and protocols apply when discoveries of koiwi and taonga occur in the Taharoa dune environment as a result of mining activity, and that tikanga/protocol is reflected in existing and proposed consent conditions. Defined urupā are located within the dune system where accidentally discovered koiwi are interred with appropriate tikanga being observed. A buffer in which no mining occurs is observed around each urupā.

All of these measures and practices will continue and mitigate the potential adverse effects in relation to archaeology to **less than minor** levels.

5.1.6 Cultural effects

In considering cultural effects, it is important to note the cultural benefits the ongoing operation of the mine has for Ngati Mahuta as tangata whenua. These benefits include employment benefits, royalties, and support for the local community. Ngati Mahuta, though the Taharoa C Block Incorporation, own the land on which the mine operates and is paid significant royalties from the mine. The mine also supports the employment and growth of Ngati Mahuta whanau. The local employment opportunity generated by the mine has allowed the local community to retain members of the community who may have otherwise moved away to seek employment elsewhere and lost their connection to the land.

TIL understand the views of the respective Taharoa Marae and Te Runanga in relation to the potential cultural effects of the Central and Southern Block Project. In summary, at a high-level:

The damming of the Wainui Stream has the potential to have adverse effects on the health of Lake Taharoa and its indigenous fishery, an important matter to Ngāti Mahuta. The maintenance of the effectiveness of the fish pass at the dam in the Wainui Stream is important to ensure the presence of indigenous fish species in the stream and lake upstream of the dam continues.

The maintenance and monitoring of baseflow in the Mitiwai Stream is also an important matter from a cultural perspective. TIL has engaged expert consultants to monitor the stream to ensure that TIL understands the potential effects of its mining activity on the Stream, which will be managed through consent conditions. Rehabilitation of the mine site to a sustainable landform and land cover is also an important matter to Ngāti Mahuta. Representatives of Ngāti Mahuta have shared their desire for the land to be returned to its natural state following mining activity (being rolling sand dunes with some pockets of vegetation). In that regard, TIL has developed and is implementing an overall Site Rehabilitation Plan and updated Conceptual Site Closure Plan in place to be implemented in the event that the mine closes in the future.

TIL propose to consult with the respective Taharoa Marae and Te Runanga in the preparation of the various management plans that govern the management of effects at the mine. Such consultation and engagement benefits both parties – TIL will gain the benefit of access to the skills and expertise that reside within the marae and hapu whanau, while marae and hapu whanau will have the opportunity to influence the content of management plans that will play an important part in managing the ongoing effects of the mining activity. TIL will also propose the provision of a website

which includes monthly monitoring records to communicate data to mana whenua and the community.

5.1.7 Air Quality Effects

The mine is located in an isolated location subject to extreme westerly winds. In this environment, there is potential for wind-blown sand from the mine site to generate adverse effects on adjoining and adjacent sites to the mine, including in Taharoa Village. TIL implement a range of avoidance and mitigation techniques to control such emissions including the erection of fencing to trap sand particles, placing ground cover (for example, coconut matting) on exposed areas, using mobile and automated fixed watering systems on internal site roads, enforcing vehicle speed limits, and progressively rehabilitating mined out areas. These measures mean that the mine site can operate in accordance with the relevant permitted activity rule of the Waikato Regional Plan with regards to air quality. TIL proposes to implement a Dust Management Plan to manage the implementation of these dust prevention mechanisms. Although there remains the potential for off-site discharges of dust due to the coastal environment, these discharges are highly unlikely to result in adverse effects to human health. Acoustic Effects

The mining activities have the potential to have adverse noise effects on key sensitive receptors on sites adjoining the Northern Block (1891 Taharoa Road, 1891A Taharoa Road, Te Kōraha Marae and 25 Rotopuhoe Road). However, these receptors are located several hundred metres from where mining will occur on the Northern Block and given this separation distance, it is expected that the works will be able to be managed to comply with the Waitomo District Plan daytime and nighttime noise limits. As a result, any potential adverse effects from noise from mining on the Northern Block on sensitive receivers is expected to be **less than minor**.

Mining on the Central and Southern Blocks has been continuous since the 1970s and benefits from existing use rights with respect to noise levels and associated acoustic effects. Notwithstanding this, noise levels are expected to be compliant with District Plan noise limits. TIL will continue to adopt the best practicable option to ensure that the emission of noise from these blocks does not exceed a reasonable level for any nearby sensitive receptors.

5.2 Effects relating to the Central and Southern Blocks only

5.2.1 Effects of damming Wainui Stream

Authorisation of the dam in the Wainui Stream will result in a similar water regime to what is currently present. Fish passage will be provided for via the monitoring and maintenance of a fish pass which achieves the intended purpose of allowing grey mullet and other targeted species to be able to navigate upstream to Lake Taharoa. The downstream migration of juvenile native fish can be adequately addressed through consent conditions which include the retention of a minimum flow within the fish pass and downstream of the dam, as well as monitoring of fish pass performance. As a result, the effects of the dam on fish passage has been assessed as **negligible**.

5.2.2 Effects on water quantity

Water is extracted from the impounded section of the Wainui Stream for mining and shiploading processes. Separate water take consents are held for the mining and shiploading takes and the consents cannot be exercised at the same time. The mine is currently operating within the historically consented limits for water abstraction and no further water quantity is required for the continued operation of the mine. The Wainui Stream catchment is not over-allocated and there are

no permits held by any other party to take water from the stream. As a result, adverse water quantity effects are avoided.

5.2.3 Effects of water take on marginal wetlands

The proposed water takes have the potential to have adverse effects on marginal wetlands around the edges of Lake Taharoa. Noting that the wetlands have acclimated to the lake levels that have been experienced since the installation of the dam in the Wainui Stream in the early 1970's, the magnitude of these effects has been assessed as **low** given that the water takes will be operated in a similar manner to what has been historically occurred at the mine. Importantly, TIL is proposing to retain existing conditions that require water takes to cease if the lake levels reach a certain minimum point. Conditions will also be proposed that require ongoing monitoring of the lake margin wetlands and management responses to be implemented if the lake level remains low for an extended period and the wetlands show signs of stress (other than that caused by natural seasonal conditions).

5.2.4 Effects on benthic fauna

The proposed ship-loading infrastructure including pipelines on the seabed and the tethering mechanism for the SBM will continue to occupy part of the seabed and impact on a small amount of available subtidal sandflat habitat. Given the small percentage of the available subtidal sandflat habitat this represents, this is assessed as having a low magnitude of effect on benthic ecology. The effects of constructing the pipeline have also been assessed as being **low**.

5.2.5 Effects on fish and seafood species

The discharge from the ship loading process has the potential to have adverse effects on existing habitat for fish and seafood species. Given the relatively infrequent and short-term nature of the discharge and the highly mobile nature of fish species the potential adverse effects are assessed as **negligible**. The presence of green lipped mussels in the area of the discharge indicates that ongoing ship loading discharges do not inhibit mussel colonisation and has a **negligible** effect on seafood resource species.

5.2.6 Effects on marine mammals

A number of marine mammal species can be present in the wider marine area around Port Taharoa such as Māui dolphins, common dolphins, southern right whales and Orca/killer whales. Given the low level of risk posed by the ship loading operation and the fact that it has been occurring in the vicinity since the early 1970's, the overall risk of adverse effects for marine mammals is assessed as **negligible**. Nevertheless, to recognise the sensitivity of the marine mammals that traverse the area, TIL propose conditions that require an underwater noise survey to be undertaken if 35 ship visits occur in a 12 month period, in order to inform best practice underwater noise measures.

5.2.7 Effects on coastal processes

TIL seeks to continue the ability to discharge up to 75,000m³ per day of ship loading water, including freshwater and fine sediment, up to a maximum of 7,500,000m³ per year. As a result of dilution and dispersion of the sediment plume provided by oceanic conditions, the effect of this discharge on coastal processes has been assessed as being **less than minor**.

5.2.8 Effects of discharges in the Coastal Marine Area (CMA)

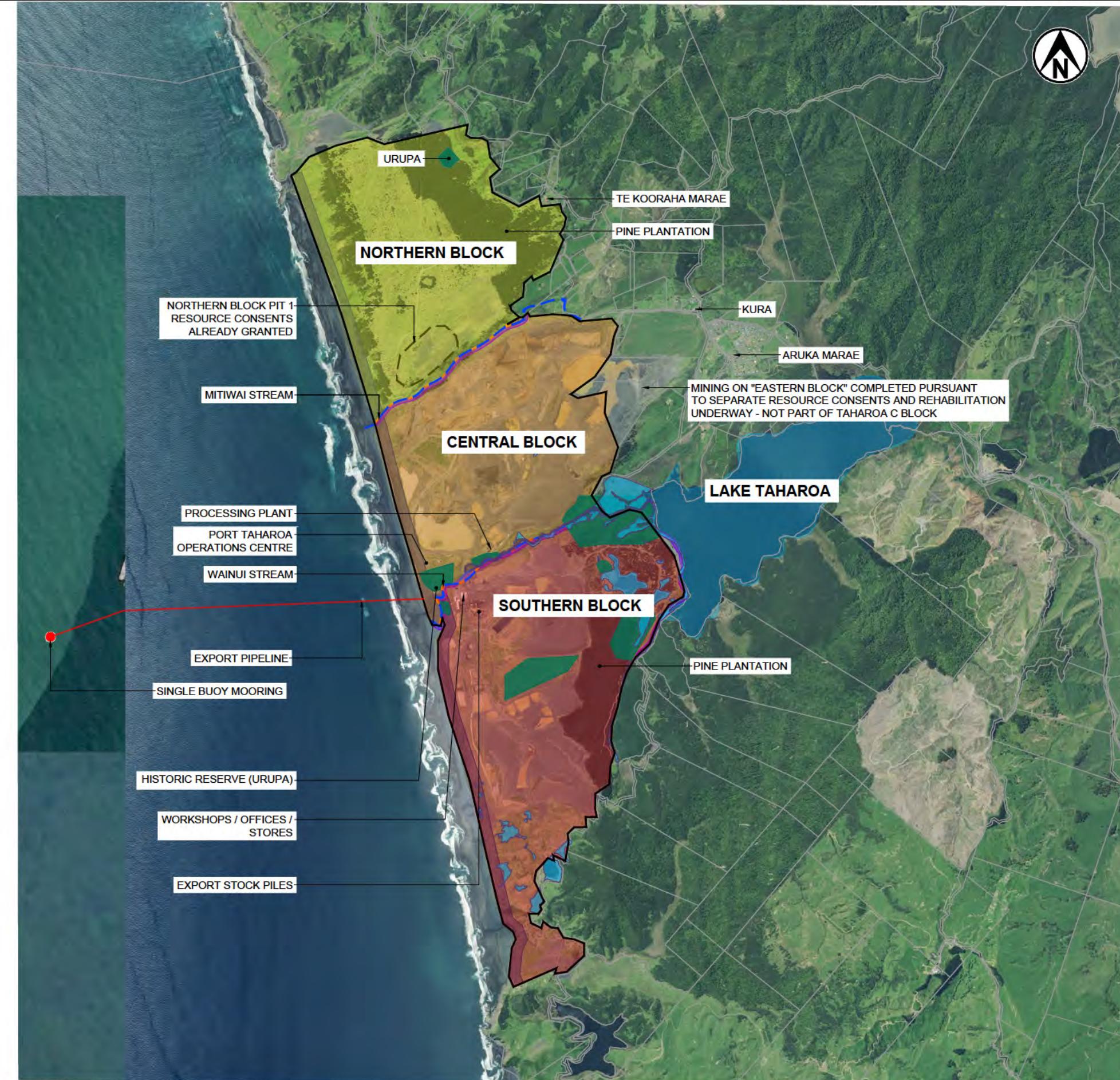
The potential adverse effects of the sediment discharge from the ship-loading events have been addressed above. The discharge includes some trace levels of naturally occurring contaminants in the ironsand that is pumped in slurry form into the ship. Because of the extremely low levels of the naturally occurring contaminants, and the dilution provided by the sea water, the discharge will not result in any measurable toxicity effect on benthic fauna.

TIL is seeking consent to continue to discharge excess process water and stormwater to the CMA at a rate of 32,000m³/day. This discharge occurs infrequently and when there is no suitable alternative to provide for the discharge on land - primarily at times of prolonged heavy rainfall. The potential ecological effects from the process water/stormwater discharge are likely to be even less than those of the ship loading discharge which were assessed to be less than minor. Correspondingly, no further actions to avoid, remedy or mitigate potential effects from the process wastewater and stormwater discharges are required apart from monitoring of the discharge quality and composition.

5.2.9 Effects on navigation safety

The continued ship movements to and from the Port of Taharoa and the occupation of the CMA by ship loading infrastructure have the potential to have adverse effects on navigational safety of other users of the CMA. However, the use of this area for recreational watercraft and commercial vessels is infrequent and the movement of ironsand export ships has been established in the area since the early 1970's. No more than one ship can access the mooring buoy at one time. Furthermore, the Port of Taharoa is operated in compliance with the New Zealand Port and Harbour Marine Safety Code, the Harbourmaster previously had no objection to the continued activity and several improvements have been implemented since the granting of the now expired resource consents in 2002. For these reasons, potential adverse effects on navigation safety have been assessed as **less than minor**.

LEGEND	
	STREAM
	PROPERTY BOUNDARIES
	MINING LICENCE AREA (TAHAROA C BLOCK)
	NORTHERN BLOCK
	CENTRAL BLOCK
	SOUTHERN BLOCK
	30m PERENNIAL WATER BODY / STREAM SETBACK
	100m MHWS SETBACK SUBJECT TO SURVEY
	ARCHEOLOGICAL AREAS RESERVED FROM MINING
	WETLAND



Holly-Marie Rearic

From: Harach, Olivia OH [REDACTED]
Sent: Wednesday, 25 June 2025 2:25 pm
To: Holly-Marie Rearic; Stephanie de Groot
Subject: FW: Invitation to the Department of Conservation to meet or provide written feedback – Taharoa Ironsands Limited Fast-track Applications
Attachments: Consultation letter to the Department of Conservation dated 24 June 2025.pdf



Olivia Harach
Taharoa Ironsands Ltd

P
[REDACTED]

From: Harach, Olivia OH
Sent: Wednesday, 25 June 2025 2:12 pm
To: fasttrackapplicationenquiries@doc.govt.nz
Cc: Coffey, Wayne WC [REDACTED]
Subject: Invitation to the Department of Conservation to meet or provide written feedback – Taharoa Ironsands Limited Fast-track Applications

Good afternoon

Please see the **attached** letter in relation to applications that TIL is preparing for the Central and Southern Block Project and Northern Block Project under the Fast-track Approvals Act 2024.

The purpose of the letter is to offer you opportunity to discuss the applications with TIL and/or for you to provide your written feedback on the applications.

Please let me know if you have any queries.

Regards
Wayne



Taharoa Ironsands Ltd

24 June 2025

BY EMAIL: fasttrackapplicationenquiries@doc.govt.nz

Department of Conservation
Conservation House – Whare Kaupapa Atawhai
18-32 Manners Street
Wellington Central
Wellington 6011

Taharoa Ironsands Limited – Fast-track Approvals Act 2024 applications

1. Taharoa Ironsands Limited (**TIL**) owns and operates the Taharoa Ironsand Mine which has been in operation since 1973 and accesses the largest iron sand deposit in New Zealand.
2. The Mine is divided into blocks known as the Northern, Central and Southern Block which are all located on Taharoa C Block, as well as the Eastern Blocks and the Te Mania Extension which are located on adjoining land.
3. The following two projects are listed in Schedule 2 of the Fast-track Approvals Act 2024 (**FTAA**):
 - (a) Central & Southern Block Mining Project: TIL needs to replace its resource consents relating to these blocks to continue operating the existing Mine. TIL made an application under the standard resource consenting process under the Resource Management Act 1991 (**RMA**). The consenting process was lengthy and TIL was not satisfied with the decision, which led it to appeal the decision to the Environment Court on 12 December 2024. Since the appeal was filed, the FTAA has been enacted. This provides an alternative, and suitable, pathway for TIL to apply for the necessary approvals for the Central and Southern Blocks.
 - (b) Northern Block Mining Project: TIL also seeks to expand its existing operations into the Northern Block of the mining area. This project has also been directly referred by the Government to utilise the Fast-track process on account of its regional and national significance.
4. We are now preparing our substantive applications for both projects. We are intending to file the applications with the Environmental Protection Agency in June/July 2025. Enviser is managing the preparation of the applications on behalf of TIL with input from a range of technical consultants, including Grant Eccles (planner) of Tonkin & Taylor Limited. Tonkin & Taylor has provided a high-level summary of what will be sought in each application in **Appendix A**.
5. We have previously engaged with the Department of Conservation (**DOC**) in respect of our application under the RMA for the Central and Southern Blocks so TIL understands DOC's view in respect of the consenting of those Blocks. However, are writing to provide you with an opportunity to discuss the fast-track applications while they are being prepared. We are otherwise open to receiving written feedback if you do not wish to meet.
6. We are looking to arrange initial meetings to discuss the applications as soon as possible. Otherwise, we would appreciate that any written feedback is provided by 11 July 2025.

7. If you would like to discuss the applications with us or provide written feedback, please let us know using the following email address: [REDACTED]

Yours faithfully



Wayne Coffey
Managing Director and CEO of Taharoa Ironsands Limited

Appendix A

Taharoa Ironsands Mine – Project summary for pre-application consultation

- **Northern Block Mining Project**
- **Central and Southern Block Mining Project**

1 Overview

Taharoa Ironsands Limited (TIL) operate an iron sand mine at Taharoa, on the West Coast of the North Island, approximately 8 km south of Kawhia Harbour. The Taharoa Mine has been in operation since 1973 (owned by New Zealand Steel until 2017). The mine site covers an area of approximately 1,300 hectares, primarily on Māori land legally described as the Taharoa C Block and the part of the coastal marine area (CMA) legally defined as Port Taharoa (**mine**).

For the purposes of mining activity, Taharoa C Block is divided into blocks. As shown on the attached plan:

- (a) the area of the site to the north of the Mitiwai Stream is known as the Northern Block.
- (b) the area of the site between the Mitiwai Stream and the Wainui Stream is known as the Central Block; and
- (c) the area of the site to the south of the Wainui Stream is known as the Southern Block.

The Central and Southern Blocks are currently operated under a suite of resource consents granted in 2006.¹ Mining activity has not historically occurred in the Northern Block.

TIL is now preparing applications for the necessary resource consents, wildlife permits and archaeological authorities under the Fast-track Approvals Act 2024 (FTAA) to authorise:

- the extraction of sand (and associated activities) on the Northern Block (known as the Northern Block Mining Project); and
- the continuation of sand extraction (and associated activities which support the entire mine, including its export operation) on the Central and Southern Blocks and in the CMA (known as the Central and Southern Block Mining Project).

The following describes the proposed mining and associated works which are subject to the applications, details the resource consents and approvals sought and provides a high-level summary of the potential effects on the environment of each project at this stage. As the applications are currently being prepared, this information is based on the work completed as of 01 May 2025, and is subject to change.

¹ TIL also hold separate resource consents for mining of (i) the “Eastern Block” granted in 2018 (mining now completed and rehabilitation underway), and (ii) the “Te Mania Extension” adjoining the Eastern Block granted in 2022 (mining yet to commence), and (iii) a small area in the Northern Block known as “Pit 1” granted in late 2024 (mining currently in progress). Mining at these locations relies on the water take resource consents and the coastal permits granted for the Central and Southern Blocks.

2 Description of proposed works

TIL propose to mine ironsand throughout the Northern, Central and Southern Blocks excluding areas where mining restrictions will apply. The areas where mining activity will not take place are within 100 m of Mean High Water Springs, 30 m of perennial water bodies (Mitiwai Stream, Wainui Stream and Lake Taharoa), and within already identified urupa and archaeological re-interment areas on the mine. Other mining exclusion areas may be identified as part of the completion of technical assessments that are currently underway. Any additional mining exclusion areas that are identified by the technical assessments will be included in the substantive FTAA applications.

Whilst the process to extract, process and export the ironsand can and does vary depending on the nature of the deposit being mined at the time, it follows the same broad steps. These activities, which are sought to be authorised as part of the Central and Southern Block Project, include:

1. **Vegetation, topsoil and overburden removal, including harvesting of trees with commercial value (pines).** Useful native species are removed prior to stripping of topsoil for use in the eco-sourced nursery on site. Topsoil is stockpiled on-site for use in future rehabilitation activities.
2. **Extraction and processing of Ironsand.** Raw Ironsand is extracted using various methods and equipment depending on ground conditions. In upper layers, standard earthmoving machinery such as excavators, bulldozers, and trucks are used to collect the ironsand and deposit it into a Dry Mining Unit (DMU). The DMU mixes the ironsand with water to form a slurry, which is then pumped to a treatment plant for titanomagnetite extraction.
3. During this process, groundwater and surface water may enter the active excavation area. To maintain dry working conditions, this water may be pumped out as required. However, as mining progresses to deeper layers, maintaining a dry pit may become impractical. In such cases, a cutter-suction dredge is used in a water-filled pond. The dredge floats on the water and uses a submerged dredge head to cut, fluidise, and pump the Ironsand slurry through a pipeline to the treatment plant. The dredge is capable of operating at depths of 8 to 15 meters below the pond surface. In some instances, a long-reach excavator may also be used to extract material from within the pond.
4. **Processing.** The extracted ironsand is transported to a centralised processing plant where it is concentrated and processed. The ironsand is refined using screening and gravity separation. The ironsand is mixed into a slurry and pumped through a seabed pipeline to a bulk carrier ship moored at the Port of Taharoa. The export pipelines run from the processing and storage facility located on land to a Single Buoy Mooring (SBM), located approximately 3.5 km offshore.
5. **Ship loading and dewatering.** Bulk carrier ships moor at the SBM to receive the ironsand in slurry form from the export pipelines. Each ship contains dewatering equipment and the resulting freshwater, containing residual fine suspended material (inert, inorganic geological material) that is removed from the ironsand slurry, is discharged from the ship to the sea. The discharge forms a buoyant plume that floats on the seawater surface before dispersal and dilution. Ship loading operations are currently undertaken approximately 20 times per year and will increase in frequency in future as production increases up to a projected maximum of 35 times per year. Each ship loading activity takes approximately 90 hours (of pumping time) however weather conditions have an influence on loading timeframes.

6. **Tailings disposal and rehabilitation of mined areas.** The tailings (ferrous and non-ferrous sand, silts and clays) which are separated from the exportable product are pumped as a slurry to tailings disposal areas. The discharged slurry dewateres by gravity, with the drainage water collected and directed into a settlement pond or ponds. Once the tailings have dewatered, mechanical plant (excavators and dozers) redistribute the material to form the grade and levels required by the rehabilitation plan for that area. Following this the land may be stabilised, top soiled and replanted.

To operate the mine, the process requires the abstraction of water from the Wainui Stream via a constructed dam incorporating a fish pass, and the discharge of stormwater to the Wainui Stream and the discharge of process water to settling ponds. Excess stormwater and process water is discharged to the CMA via the ship loading pipelines.

The activities sought to be authorised as part of the Northern Block Mining Project include (but are not limited to):

- (a) vegetation, topsoil and overburden removal, and excavation and processing of iron sand above and below the water table (as above);
- (b) the transportation of that product via temporary pipelines to the established processing plant on the Central and Southern Block;
- (c) processing (as above);
- (d) discharge of process water to land; and
- (e) tailing disposal and rehabilitation of mined areas (as above).

The Northern Block Mining Project will rely on / be supported by the processing infrastructure located on the Central and Southern Blocks. It will also rely on / be supported by the consents being sought for the Central and Southern Block to take and use water from the Wainui Stream, discharge of stormwater to the Wainui Stream and the CMA, discharge of process water to the CMA and transport of processed product from the processing facility through the ship-loading pipelines to the CMA. No changes are being proposed to the existing water take limits and discharge limits to facilitate mining of the Northern Block.

3 Approvals sought

3.1 Resource Management Act 1991

A summary of the resource consents that are required for the Northern, Central and Southern Blocks is set out below.

3.1.1 Resource consents required for the Northern Block

National Environmental Standard for Freshwater 2020 – consents to clear vegetation and undertake earthworks within and within 10m of a natural inland wetland. Consents are also required to take, use, dam, or divert water within and within 100 m of a natural inland wetland and to discharge water within and within 100 m of a natural inland wetland.

National Environmental Standard for Commercial Forestry 2017 – consent to harvest pine trees within Class 8e land.

Operative Waikato Regional Plan – consents for soil disturbance and vegetation clearance activities, diversion and taking of groundwater and surface of water associated with mining above and below the water table, discharge of a contaminant to land or water (process water and placement of tailings) and for overburden disposal to land.

Additionally, resource consent is required under the Operative Waitomo District Plan for the potential disturbance of archaeological sites recorded in the Plan - this consent applies to the Northern Block only given that mining has occurred since the early 1970's on the Central and Southern Blocks.

3.1.2 Resource consents required for the Central and Southern Blocks

The resource consents set out above are also required for the Central and Southern Blocks.² In addition, the following resource consents are required for the Central and Southern Blocks Project:

Operative Waikato Regional Plan – consents for the damming, diversion and taking of surface water and groundwater, for stream bed disturbance, and for the discharge of stormwater to surface water.

Operative and Proposed Waikato Regional Coastal Plans – consents for the use and occupation of the Coastal Marine Area by the export pipelines and the SBM, for discharges to and depositions in the CMA from shiploading activities, and for the discharge of stormwater from the export pipelines.

3.2 Wildlife Act 1953

A wildlife permit will be required to manage lizards if they are identified prior to vegetation removal or ground disturbance works.

3.3 Heritage New Zealand Pouhere Taonga Act 2014

Archaeological authorities will be sought due to the potential for currently undiscovered archaeological features to be disturbed by mining activities (excluding urupa and archaeological areas reserved from mining which will not be disturbed).

4 Benefits of the Projects

The continuation of the mining activity on the Taharoa C Block that will be facilitated by the approvals sought under the FTAA will generate significant regional and national benefits. The Central and Southern Block Mining Project and Northern Block Project will directly contribute billions to the New Zealand economy (through employment, income for landowners, business for regional supplies and the payment of taxes).

The mine provides significant employment opportunities for the community, particularly local Māori. Over 82% of income earned by local Ngāti Mahuta comes from employment at the mine. TIL has a core workforce of 170-80 people but employs upwards of 300 staff and contractors.

TIL relies on locally sourced goods and services including the supply of electricity and services from surrounding areas including Kawhia, Te Kuiti, Otorohanga, Te Awamutu and Hamilton. TIL also relies on specialist sub-contractor support including the maintenance and management of specialised mine machinery and equipment. The support TIL relies on (and will continue to rely on) from

² Excluding the resource consent required for archaeological site disturbance.

surrounding centres for the Northern Block Project and Central and Southern Block Mining Project will inject billions into the local economy over the life of the consents sought for the Project.

The mine also provides essential benefits to the local Taharoa Village which was established around the mine and exists today because of the substantial financial contribution the mine makes every year.

5 Summary of potential adverse effects on the environment

The following high-level summary of effects on the environment is based on technical assessments previously completed in relation to mining of the Central and Southern blocks. These assessments are currently being updated, and additional assessments are being completed for mining of the Northern Block. A full assessment of effects supported by technical assessments will be included in the applications for the Northern and Central/Southern Blocks respectively.

5.1 Effects common to the Northern, Central and Southern Blocks

5.1.1 Effects on terrestrial ecology (including bats, birds, lizards)

Disturbance from mining activities has the potential to have adverse effects on wetland and grassland bird species. The loss of existing grassland due to the mining activity may also result in potential injury or death of various threatened native skink present in low numbers in the grassland. The overall level of effect on terrestrial ecology has been assessed as being **low** with the provision of an over-arching Environmental Management Plan (EMP), including an Avifauna Management Plan, Bat Management Plan and a Lizard Management Plan, and imposition of appropriate conditions such as a requirement for there to be a 30 m planting buffer around all natural water bodies. Subject to the imposition of conditions, the overall level of effects on terrestrial ecology has been assessed as **minor**.

5.1.2 Effects of mining below the water table

When mining activity interacts with groundwater there may be the potential for adverse effects on surface freshwater bodies if there is a hydraulic connection between the groundwater and surface water. This connection will be carefully monitored. Any adverse effects on the primary freshwater bodies on the site (the Mitiwai Stream and the Wainui Stream) can be avoided and mitigated through consent conditions including for example, requirements to maintain a minimum flow within the streams.

5.1.3 Effects of discharge to land

The discharge of tailings and surplus process water to land has the potential to cause adverse effects on landform, groundwater and nearby waterways. The tailings material is re-formed as close as practicable to the original landform. The discharge of surplus process water does not result in contamination of groundwater due to the natural filtering provided by the sandy ground conditions. Overall, the adverse effects of discharges to land have been assessed as **less than minor**.

5.1.4 Land disturbance effects

The mining operation is located in a high-risk erosion area and the mining and stockpiling of iron sand has the potential to result in adverse effects on land stability. Given that the mine has a good operational history with no erosion issues requiring mitigation, a rehabilitation process and

revegetation plan is followed for disturbed areas, and perennial waterbody mining setbacks are imposed, any adverse effects can be considered **negligible**.

5.1.5 Archaeological effects

Taharoa C Block is and has always been Māori land which means that there is elevated potential for accidental discovery of koi iwi and other taonga in the dune environment of the area. Ngāti Mahuta derived tikanga and protocols apply when discoveries of koiwi and taonga occur in the Taharoa dune environment as a result of mining activity, and that tikanga/protocol is reflected in existing and proposed consent conditions. Defined urupā are located within the dune system where accidentally discovered koiwi are interred with appropriate tikanga being observed. A buffer in which no mining occurs is observed around each urupā.

All of these measures and practices will continue and mitigate the potential adverse effects in relation to archaeology to **less than minor** levels.

5.1.6 Cultural effects

In considering cultural effects, it is important to note the cultural benefits the ongoing operation of the mine has for Ngati Mahuta as tangata whenua. These benefits include employment benefits, royalties, and support for the local community. Ngati Mahuta, though the Taharoa C Block Incorporation, own the land on which the mine operates and is paid significant royalties from the mine. The mine also supports the employment and growth of Ngati Mahuta whanau. The local employment opportunity generated by the mine has allowed the local community to retain members of the community who may have otherwise moved away to seek employment elsewhere and lost their connection to the land.

TIL understand the views of the respective Taharoa Marae and Te Runanga in relation to the potential cultural effects of the Central and Southern Block Project. In summary, at a high-level:

The damming of the Wainui Stream has the potential to have adverse effects on the health of Lake Taharoa and its indigenous fishery, an important matter to Ngāti Mahuta. The maintenance of the effectiveness of the fish pass at the dam in the Wainui Stream is important to ensure the presence of indigenous fish species in the stream and lake upstream of the dam continues.

The maintenance and monitoring of baseflow in the Mitiwai Stream is also an important matter from a cultural perspective. TIL has engaged expert consultants to monitor the stream to ensure that TIL understands the potential effects of its mining activity on the Stream, which will be managed through consent conditions. Rehabilitation of the mine site to a sustainable landform and land cover is also an important matter to Ngāti Mahuta. Representatives of Ngāti Mahuta have shared their desire for the land to be returned to its natural state following mining activity (being rolling sand dunes with some pockets of vegetation). In that regard, TIL has developed and is implementing an overall Site Rehabilitation Plan and updated Conceptual Site Closure Plan in place to be implemented in the event that the mine closes in the future.

TIL propose to consult with the respective Taharoa Marae and Te Runanga in the preparation of the various management plans that govern the management of effects at the mine. Such consultation and engagement benefits both parties – TIL will gain the benefit of access to the skills and expertise that reside within the marae and hapu whanau, while marae and hapu whanau will have the opportunity to influence the content of management plans that will play an important part in managing the ongoing effects of the mining activity. TIL will also propose the provision of a website

which includes monthly monitoring records to communicate data to mana whenua and the community.

5.1.7 Air Quality Effects

The mine is located in an isolated location subject to extreme westerly winds. In this environment, there is potential for wind-blown sand from the mine site to generate adverse effects on adjoining and adjacent sites to the mine, including in Taharoa Village. TIL implement a range of avoidance and mitigation techniques to control such emissions including the erection of fencing to trap sand particles, placing ground cover (for example, coconut matting) on exposed areas, using mobile and automated fixed watering systems on internal site roads, enforcing vehicle speed limits, and progressively rehabilitating mined out areas. These measures mean that the mine site can operate in accordance with the relevant permitted activity rule of the Waikato Regional Plan with regards to air quality. TIL proposes to implement a Dust Management Plan to manage the implementation of these dust prevention mechanisms. Although there remains the potential for off-site discharges of dust due to the coastal environment, these discharges are highly unlikely to result in adverse effects to human health. Acoustic Effects

The mining activities have the potential to have adverse noise effects on key sensitive receptors on sites adjoining the Northern Block (1891 Taharoa Road, 1891A Taharoa Road, Te Kōraha Marae and 25 Rotopuhoe Road). However, these receptors are located several hundred metres from where mining will occur on the Northern Block and given this separation distance, it is expected that the works will be able to be managed to comply with the Waitomo District Plan daytime and nighttime noise limits. As a result, any potential adverse effects from noise from mining on the Northern Block on sensitive receivers is expected to be **less than minor**.

Mining on the Central and Southern Blocks has been continuous since the 1970s and benefits from existing use rights with respect to noise levels and associated acoustic effects. Notwithstanding this, noise levels are expected to be compliant with District Plan noise limits. TIL will continue to adopt the best practicable option to ensure that the emission of noise from these blocks does not exceed a reasonable level for any nearby sensitive receptors.

5.2 Effects relating to the Central and Southern Blocks only

5.2.1 Effects of damming Wainui Stream

Authorisation of the dam in the Wainui Stream will result in a similar water regime to what is currently present. Fish passage will be provided for via the monitoring and maintenance of a fish pass which achieves the intended purpose of allowing grey mullet and other targeted species to be able to navigate upstream to Lake Taharoa. The downstream migration of juvenile native fish can be adequately addressed through consent conditions which include the retention of a minimum flow within the fish pass and downstream of the dam, as well as monitoring of fish pass performance. As a result, the effects of the dam on fish passage has been assessed as **negligible**.

5.2.2 Effects on water quantity

Water is extracted from the impounded section of the Wainui Stream for mining and shiploading processes. Separate water take consents are held for the mining and shiploading takes and the consents cannot be exercised at the same time. The mine is currently operating within the historically consented limits for water abstraction and no further water quantity is required for the continued operation of the mine. The Wainui Stream catchment is not over-allocated and there are

no permits held by any other party to take water from the stream. As a result, adverse water quantity effects are avoided.

5.2.3 Effects of water take on marginal wetlands

The proposed water takes have the potential to have adverse effects on marginal wetlands around the edges of Lake Taharoa. Noting that the wetlands have acclimated to the lake levels that have been experienced since the installation of the dam in the Wainui Stream in the early 1970's, the magnitude of these effects has been assessed as **low** given that the water takes will be operated in a similar manner to what has been historically occurred at the mine. Importantly, TIL is proposing to retain existing conditions that require water takes to cease if the lake levels reach a certain minimum point. Conditions will also be proposed that require ongoing monitoring of the lake margin wetlands and management responses to be implemented if the lake level remains low for an extended period and the wetlands show signs of stress (other than that caused by natural seasonal conditions).

5.2.4 Effects on benthic fauna

The proposed ship-loading infrastructure including pipelines on the seabed and the tethering mechanism for the SBM will continue to occupy part of the seabed and impact on a small amount of available subtidal sandflat habitat. Given the small percentage of the available subtidal sandflat habitat this represents, this is assessed as having a low magnitude of effect on benthic ecology. The effects of constructing the pipeline have also been assessed as being **low**.

5.2.5 Effects on fish and seafood species

The discharge from the ship loading process has the potential to have adverse effects on existing habitat for fish and seafood species. Given the relatively infrequent and short-term nature of the discharge and the highly mobile nature of fish species the potential adverse effects are assessed as **negligible**. The presence of green lipped mussels in the area of the discharge indicates that ongoing ship loading discharges do not inhibit mussel colonisation and has a **negligible** effect on seafood resource species.

5.2.6 Effects on marine mammals

A number of marine mammal species can be present in the wider marine area around Port Taharoa such as Māui dolphins, common dolphins, southern right whales and Orca/killer whales. Given the low level of risk posed by the ship loading operation and the fact that it has been occurring in the vicinity since the early 1970's, the overall risk of adverse effects for marine mammals is assessed as **negligible**. Nevertheless, to recognise the sensitivity of the marine mammals that traverse the area, TIL propose conditions that require an underwater noise survey to be undertaken if 35 ship visits occur in a 12 month period, in order to inform best practice underwater noise measures.

5.2.7 Effects on coastal processes

TIL seeks to continue the ability to discharge up to 75,000m³ per day of ship loading water, including freshwater and fine sediment, up to a maximum of 7,500,000m³ per year. As a result of dilution and dispersion of the sediment plume provided by oceanic conditions, the effect of this discharge on coastal processes has been assessed as being **less than minor**.

5.2.8 Effects of discharges in the Coastal Marine Area (CMA)

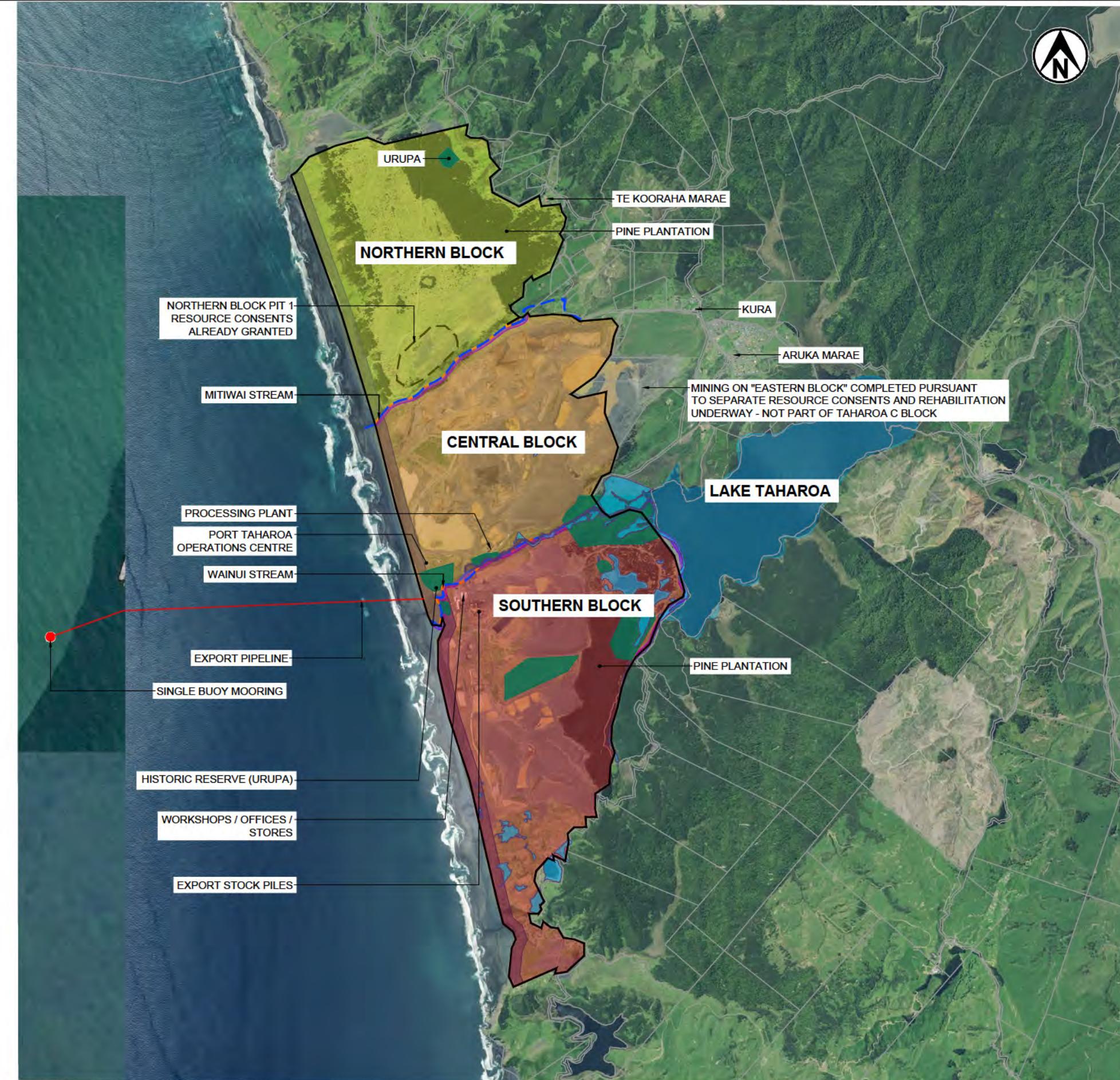
The potential adverse effects of the sediment discharge from the ship-loading events have been addressed above. The discharge includes some trace levels of naturally occurring contaminants in the ironsand that is pumped in slurry form into the ship. Because of the extremely low levels of the naturally occurring contaminants, and the dilution provided by the sea water, the discharge will not result in any measurable toxicity effect on benthic fauna.

TIL is seeking consent to continue to discharge excess process water and stormwater to the CMA at a rate of 32,000m³/day. This discharge occurs infrequently and when there is no suitable alternative to provide for the discharge on land - primarily at times of prolonged heavy rainfall. The potential ecological effects from the process water/stormwater discharge are likely to be even less than those of the ship loading discharge which were assessed to be less than minor. Correspondingly, no further actions to avoid, remedy or mitigate potential effects from the process wastewater and stormwater discharges are required apart from monitoring of the discharge quality and composition.

5.2.9 Effects on navigation safety

The continued ship movements to and from the Port of Taharoa and the occupation of the CMA by ship loading infrastructure have the potential to have adverse effects on navigational safety of other users of the CMA. However, the use of this area for recreational watercraft and commercial vessels is infrequent and the movement of ironsand export ships has been established in the area since the early 1970's. No more than one ship can access the mooring buoy at one time. Furthermore, the Port of Taharoa is operated in compliance with the New Zealand Port and Harbour Marine Safety Code, the Harbourmaster previously had no objection to the continued activity and several improvements have been implemented since the granting of the now expired resource consents in 2002. For these reasons, potential adverse effects on navigation safety have been assessed as **less than minor**.

LEGEND	
	STREAM
	PROPERTY BOUNDARIES
	MINING LICENCE AREA (TAHAROA C BLOCK)
	NORTHERN BLOCK
	CENTRAL BLOCK
	SOUTHERN BLOCK
	30m PERENNIAL WATER BODY / STREAM SETBACK
	100m MHWS SETBACK SUBJECT TO SURVEY
	ARCHEOLOGICAL AREAS RESERVED FROM MINING
	WETLAND

0 500 1000 m 1:20000 (A1)
1:40000 (A3)

Holly-Marie Rearic

From: Amy Robinson [REDACTED]
Sent: Friday, 22 August 2025 5:04 pm
To: Holly-Marie Rearic
Subject: Accepted: TIL Fast Track Applications - DOC meeting

Caution - This message and accompanying data may contain information that is confidential or subject to legal privilege. If you are not the intended recipient you are notified that any use, dissemination, distribution or copying of this message or data is prohibited. If you received this email in error, please notify us immediately and erase all copies of the message and attachments. We apologise for the inconvenience. Thank you.

Holly-Marie Rearic

From: Harach, Olivia OH [REDACTED]
Sent: Wednesday, 25 June 2025 2:25 pm
To: Holly-Marie Rearic; Stephanie de Groot
Subject: FW: Invitation to Heritage New Zealand & the Ministry of Culture and Heritage meet or provide written feedback – Taharoa Ironsands Limited Fast-track Applications
Attachments: Consultation letter to Heritage New Zealand Pouhere Taonga & Ministry of Culture and Heritage dated 24 June 2025.pdf



Olivia Harach
Taharoa Ironsands Ltd

P [REDACTED]
E [REDACTED]

From: Harach, Olivia OH
Sent: Wednesday, 25 June 2025 2:13 pm
To: infocentral@heritage.org.nz; info@mch.govt.nz; [REDACTED]
Cc: Coffey, Wayne WC [REDACTED]
Subject: Invitation to Heritage New Zealand & the Ministry of Culture and Heritage meet or provide written feedback – Taharoa Ironsands Limited Fast-track Applications

Good afternoon

Please see the **attached** letter in relation to applications that TIL is preparing for the Central and Southern Block Project and Northern Block Project under the Fast-track Approvals Act 2024.

The purpose of the letter is to offer you the opportunity to discuss the applications with TIL and/or for you to provide your written feedback on the applications.

Please let me know if you have any queries.

Regards
Wayne



Taharoa Ironsands Ltd

24 June 2025

BY EMAIL: infocentral@heritage.org.nz; info@mch.govt.nz; [REDACTED]

Attention: Jamie Jacobs

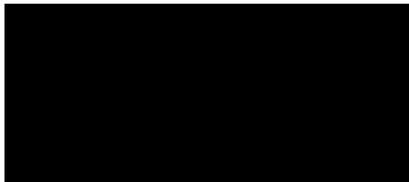
Heritage New Zealand Pouhere Taonga & Ministry for Culture and Heritage
Central Regional Office
Level 1
79 Boulcott Street
PO Box 2629
Wellington 6140

Taharoa Ironsands Limited – Fast-track Approvals Act 2024 applications

1. Taharoa Ironsands Limited (**TIL**) owns and operates the Taharoa Ironsand Mine which has been in operation since 1973 and accesses the largest iron sand deposit in New Zealand.
2. The Mine is divided into blocks known as the Northern, Central and Southern Block which are all located on Taharoa C Block, as well as the Eastern Blocks and the Te Mania Extension which are located on adjoining land.
3. The following two projects are listed in Schedule 2 of the Fast-track Approvals Act 2024 (**FTAA**):
 - (a) Central & Southern Block Mining Project: TIL needs to replace its resource consents relating to these blocks to continue operating the existing Mine. TIL made an application under the standard resource consenting process under the Resource Management Act 1991 (**RMA**). The consenting process was lengthy and TIL was not satisfied with the decision, which led it to appeal the decision to the Environment Court on 12 December 2024. Since the appeal was filed, the FTAA has been enacted. This provides an alternative, and suitable, pathway for TIL to apply for the necessary approvals for the Central and Southern Blocks.
 - (b) Northern Block Mining Project: TIL also seeks to expand its existing operations into the Northern Block of the mining area. This project has also been directly referred by the Government to utilise the Fast-track process on account of its regional and national significance.
4. We are now preparing our substantive applications for both projects. We are intending to file the applications with the Environmental Protection Agency in June/July 2025. Enviser is managing the preparation of the applications on behalf of TIL with input from a range of technical consultants, including Grant Eccles (planner) of Tonkin & Taylor Limited. Tonkin & Taylor has provided a high-level summary of what will be sought in each application in **Appendix A**.
5. We are writing to provide you with an opportunity to discuss the applications while they are being prepared. We are otherwise open to receiving written feedback if you do not wish to meet.
6. We are looking to arrange a meeting to discuss the applications as soon as possible. Otherwise, we would appreciate any written feedback being provided by 11 July 2025.

7. If you would like to discuss the applications with us or provide written feedback, please let us know using the following email address: [REDACTED]

Yours faithfully



Wayne Coffey
Managing Director and CEO of Taharoa Ironsands Limited

Appendix A

Taharoa Ironsands Mine – Project summary for pre-application consultation

- **Northern Block Mining Project**
- **Central and Southern Block Mining Project**

1 Overview

Taharoa Ironsands Limited (TIL) operate an iron sand mine at Taharoa, on the West Coast of the North Island, approximately 8 km south of Kawhia Harbour. The Taharoa Mine has been in operation since 1973 (owned by New Zealand Steel until 2017). The mine site covers an area of approximately 1,300 hectares, primarily on Māori land legally described as the Taharoa C Block and the part of the coastal marine area (CMA) legally defined as Port Taharoa (**mine**).

For the purposes of mining activity, Taharoa C Block is divided into blocks. As shown on the attached plan:

- (a) the area of the site to the north of the Mitiwai Stream is known as the Northern Block.
- (b) the area of the site between the Mitiwai Stream and the Wainui Stream is known as the Central Block; and
- (c) the area of the site to the south of the Wainui Stream is known as the Southern Block.

The Central and Southern Blocks are currently operated under a suite of resource consents granted in 2006.¹ Mining activity has not historically occurred in the Northern Block.

TIL is now preparing applications for the necessary resource consents, wildlife permits and archaeological authorities under the Fast-track Approvals Act 2024 (FTAA) to authorise:

- the extraction of sand (and associated activities) on the Northern Block (known as the Northern Block Mining Project); and
- the continuation of sand extraction (and associated activities which support the entire mine, including its export operation) on the Central and Southern Blocks and in the CMA (known as the Central and Southern Block Mining Project).

The following describes the proposed mining and associated works which are subject to the applications, details the resource consents and approvals sought and provides a high-level summary of the potential effects on the environment of each project at this stage. As the applications are currently being prepared, this information is based on the work completed as of 01 May 2025, and is subject to change.

¹ TIL also hold separate resource consents for mining of (i) the “Eastern Block” granted in 2018 (mining now completed and rehabilitation underway), and (ii) the “Te Mania Extension” adjoining the Eastern Block granted in 2022 (mining yet to commence), and (iii) a small area in the Northern Block known as “Pit 1” granted in late 2024 (mining currently in progress). Mining at these locations relies on the water take resource consents and the coastal permits granted for the Central and Southern Blocks.

2 Description of proposed works

TIL propose to mine ironsand throughout the Northern, Central and Southern Blocks excluding areas where mining restrictions will apply. The areas where mining activity will not take place are within 100 m of Mean High Water Springs, 30 m of perennial water bodies (Mitiwai Stream, Wainui Stream and Lake Taharoa), and within already identified urupa and archaeological re-interment areas on the mine. Other mining exclusion areas may be identified as part of the completion of technical assessments that are currently underway. Any additional mining exclusion areas that are identified by the technical assessments will be included in the substantive FTAA applications.

Whilst the process to extract, process and export the ironsand can and does vary depending on the nature of the deposit being mined at the time, it follows the same broad steps. These activities, which are sought to be authorised as part of the Central and Southern Block Project, include:

1. **Vegetation, topsoil and overburden removal, including harvesting of trees with commercial value (pines).** Useful native species are removed prior to stripping of topsoil for use in the eco-sourced nursery on site. Topsoil is stockpiled on-site for use in future rehabilitation activities.
2. **Extraction and processing of Ironsand.** Raw Ironsand is extracted using various methods and equipment depending on ground conditions. In upper layers, standard earthmoving machinery such as excavators, bulldozers, and trucks are used to collect the ironsand and deposit it into a Dry Mining Unit (DMU). The DMU mixes the ironsand with water to form a slurry, which is then pumped to a treatment plant for titanomagnetite extraction.
3. During this process, groundwater and surface water may enter the active excavation area. To maintain dry working conditions, this water may be pumped out as required. However, as mining progresses to deeper layers, maintaining a dry pit may become impractical. In such cases, a cutter-suction dredge is used in a water-filled pond. The dredge floats on the water and uses a submerged dredge head to cut, fluidise, and pump the Ironsand slurry through a pipeline to the treatment plant. The dredge is capable of operating at depths of 8 to 15 meters below the pond surface. In some instances, a long-reach excavator may also be used to extract material from within the pond.
4. **Processing.** The extracted ironsand is transported to a centralised processing plant where it is concentrated and processed. The ironsand is refined using screening and gravity separation. The ironsand is mixed into a slurry and pumped through a seabed pipeline to a bulk carrier ship moored at the Port of Taharoa. The export pipelines run from the processing and storage facility located on land to a Single Buoy Mooring (SBM), located approximately 3.5 km offshore.
5. **Ship loading and dewatering.** Bulk carrier ships moor at the SBM to receive the ironsand in slurry form from the export pipelines. Each ship contains dewatering equipment and the resulting freshwater, containing residual fine suspended material (inert, inorganic geological material) that is removed from the ironsand slurry, is discharged from the ship to the sea. The discharge forms a buoyant plume that floats on the seawater surface before dispersal and dilution. Ship loading operations are currently undertaken approximately 20 times per year and will increase in frequency in future as production increases up to a projected maximum of 35 times per year. Each ship loading activity takes approximately 90 hours (of pumping time) however weather conditions have an influence on loading timeframes.

6. **Tailings disposal and rehabilitation of mined areas.** The tailings (ferrous and non-ferrous sand, silts and clays) which are separated from the exportable product are pumped as a slurry to tailings disposal areas. The discharged slurry dewateres by gravity, with the drainage water collected and directed into a settlement pond or ponds. Once the tailings have dewatered, mechanical plant (excavators and dozers) redistribute the material to form the grade and levels required by the rehabilitation plan for that area. Following this the land may be stabilised, top soiled and replanted.

To operate the mine, the process requires the abstraction of water from the Wainui Stream via a constructed dam incorporating a fish pass, and the discharge of stormwater to the Wainui Stream and the discharge of process water to settling ponds. Excess stormwater and process water is discharged to the CMA via the ship loading pipelines.

The activities sought to be authorised as part of the Northern Block Mining Project include (but are not limited to):

- (a) vegetation, topsoil and overburden removal, and excavation and processing of iron sand above and below the water table (as above);
- (b) the transportation of that product via temporary pipelines to the established processing plant on the Central and Southern Block;
- (c) processing (as above);
- (d) discharge of process water to land; and
- (e) tailing disposal and rehabilitation of mined areas (as above).

The Northern Block Mining Project will rely on / be supported by the processing infrastructure located on the Central and Southern Blocks. It will also rely on / be supported by the consents being sought for the Central and Southern Block to take and use water from the Wainui Stream, discharge of stormwater to the Wainui Stream and the CMA, discharge of process water to the CMA and transport of processed product from the processing facility through the ship-loading pipelines to the CMA. No changes are being proposed to the existing water take limits and discharge limits to facilitate mining of the Northern Block.

3 Approvals sought

3.1 Resource Management Act 1991

A summary of the resource consents that are required for the Northern, Central and Southern Blocks is set out below.

3.1.1 Resource consents required for the Northern Block

National Environmental Standard for Freshwater 2020 – consents to clear vegetation and undertake earthworks within and within 10m of a natural inland wetland. Consents are also required to take, use, dam, or divert water within and within 100 m of a natural inland wetland and to discharge water within and within 100 m of a natural inland wetland.

National Environmental Standard for Commercial Forestry 2017 – consent to harvest pine trees within Class 8e land.

Operative Waikato Regional Plan – consents for soil disturbance and vegetation clearance activities, diversion and taking of groundwater and surface of water associated with mining above and below the water table, discharge of a contaminant to land or water (process water and placement of tailings) and for overburden disposal to land.

Additionally, resource consent is required under the Operative Waitomo District Plan for the potential disturbance of archaeological sites recorded in the Plan - this consent applies to the Northern Block only given that mining has occurred since the early 1970's on the Central and Southern Blocks.

3.1.2 Resource consents required for the Central and Southern Blocks

The resource consents set out above are also required for the Central and Southern Blocks.² In addition, the following resource consents are required for the Central and Southern Blocks Project:

Operative Waikato Regional Plan – consents for the damming, diversion and taking of surface water and groundwater, for stream bed disturbance, and for the discharge of stormwater to surface water.

Operative and Proposed Waikato Regional Coastal Plans – consents for the use and occupation of the Coastal Marine Area by the export pipelines and the SBM, for discharges to and depositions in the CMA from shiploading activities, and for the discharge of stormwater from the export pipelines.

3.2 Wildlife Act 1953

A wildlife permit will be required to manage lizards if they are identified prior to vegetation removal or ground disturbance works.

3.3 Heritage New Zealand Pouhere Taonga Act 2014

Archaeological authorities will be sought due to the potential for currently undiscovered archaeological features to be disturbed by mining activities (excluding urupa and archaeological areas reserved from mining which will not be disturbed).

4 Benefits of the Projects

The continuation of the mining activity on the Taharoa C Block that will be facilitated by the approvals sought under the FTAA will generate significant regional and national benefits. The Central and Southern Block Mining Project and Northern Block Project will directly contribute billions to the New Zealand economy (through employment, income for landowners, business for regional supplies and the payment of taxes).

The mine provides significant employment opportunities for the community, particularly local Māori. Over 82% of income earned by local Ngāti Mahuta comes from employment at the mine. TIL has a core workforce of 170-80 people but employs upwards of 300 staff and contractors.

TIL relies on locally sourced goods and services including the supply of electricity and services from surrounding areas including Kawhia, Te Kuiti, Otorohanga, Te Awamutu and Hamilton. TIL also relies on specialist sub-contractor support including the maintenance and management of specialised mine machinery and equipment. The support TIL relies on (and will continue to rely on) from

² Excluding the resource consent required for archaeological site disturbance.

surrounding centres for the Northern Block Project and Central and Southern Block Mining Project will inject billions into the local economy over the life of the consents sought for the Project.

The mine also provides essential benefits to the local Taharoa Village which was established around the mine and exists today because of the substantial financial contribution the mine makes every year.

5 Summary of potential adverse effects on the environment

The following high-level summary of effects on the environment is based on technical assessments previously completed in relation to mining of the Central and Southern blocks. These assessments are currently being updated, and additional assessments are being completed for mining of the Northern Block. A full assessment of effects supported by technical assessments will be included in the applications for the Northern and Central/Southern Blocks respectively.

5.1 Effects common to the Northern, Central and Southern Blocks

5.1.1 Effects on terrestrial ecology (including bats, birds, lizards)

Disturbance from mining activities has the potential to have adverse effects on wetland and grassland bird species. The loss of existing grassland due to the mining activity may also result in potential injury or death of various threatened native skink present in low numbers in the grassland. The overall level of effect on terrestrial ecology has been assessed as being **low** with the provision of an over-arching Environmental Management Plan (EMP), including an Avifauna Management Plan, Bat Management Plan and a Lizard Management Plan, and imposition of appropriate conditions such as a requirement for there to be a 30 m planting buffer around all natural water bodies. Subject to the imposition of conditions, the overall level of effects on terrestrial ecology has been assessed as **minor**.

5.1.2 Effects of mining below the water table

When mining activity interacts with groundwater there may be the potential for adverse effects on surface freshwater bodies if there is a hydraulic connection between the groundwater and surface water. This connection will be carefully monitored. Any adverse effects on the primary freshwater bodies on the site (the Mitiwai Stream and the Wainui Stream) can be avoided and mitigated through consent conditions including for example, requirements to maintain a minimum flow within the streams.

5.1.3 Effects of discharge to land

The discharge of tailings and surplus process water to land has the potential to cause adverse effects on landform, groundwater and nearby waterways. The tailings material is re-formed as close as practicable to the original landform. The discharge of surplus process water does not result in contamination of groundwater due to the natural filtering provided by the sandy ground conditions. Overall, the adverse effects of discharges to land have been assessed as **less than minor**.

5.1.4 Land disturbance effects

The mining operation is located in a high-risk erosion area and the mining and stockpiling of iron sand has the potential to result in adverse effects on land stability. Given that the mine has a good operational history with no erosion issues requiring mitigation, a rehabilitation process and

revegetation plan is followed for disturbed areas, and perennial waterbody mining setbacks are imposed, any adverse effects can be considered **negligible**.

5.1.5 Archaeological effects

Taharoa C Block is and has always been Māori land which means that there is elevated potential for accidental discovery of koi iwi and other taonga in the dune environment of the area. Ngāti Mahuta derived tikanga and protocols apply when discoveries of koiwi and taonga occur in the Taharoa dune environment as a result of mining activity, and that tikanga/protocol is reflected in existing and proposed consent conditions. Defined urupā are located within the dune system where accidentally discovered koiwi are interred with appropriate tikanga being observed. A buffer in which no mining occurs is observed around each urupā.

All of these measures and practices will continue and mitigate the potential adverse effects in relation to archaeology to **less than minor** levels.

5.1.6 Cultural effects

In considering cultural effects, it is important to note the cultural benefits the ongoing operation of the mine has for Ngati Mahuta as tangata whenua. These benefits include employment benefits, royalties, and support for the local community. Ngati Mahuta, though the Taharoa C Block Incorporation, own the land on which the mine operates and is paid significant royalties from the mine. The mine also supports the employment and growth of Ngati Mahuta whanau. The local employment opportunity generated by the mine has allowed the local community to retain members of the community who may have otherwise moved away to seek employment elsewhere and lost their connection to the land.

TIL understand the views of the respective Taharoa Marae and Te Runanga in relation to the potential cultural effects of the Central and Southern Block Project. In summary, at a high-level:

The damming of the Wainui Stream has the potential to have adverse effects on the health of Lake Taharoa and its indigenous fishery, an important matter to Ngāti Mahuta. The maintenance of the effectiveness of the fish pass at the dam in the Wainui Stream is important to ensure the presence of indigenous fish species in the stream and lake upstream of the dam continues.

The maintenance and monitoring of baseflow in the Mitiwai Stream is also an important matter from a cultural perspective. TIL has engaged expert consultants to monitor the stream to ensure that TIL understands the potential effects of its mining activity on the Stream, which will be managed through consent conditions. Rehabilitation of the mine site to a sustainable landform and land cover is also an important matter to Ngāti Mahuta. Representatives of Ngāti Mahuta have shared their desire for the land to be returned to its natural state following mining activity (being rolling sand dunes with some pockets of vegetation). In that regard, TIL has developed and is implementing an overall Site Rehabilitation Plan and updated Conceptual Site Closure Plan in place to be implemented in the event that the mine closes in the future.

TIL propose to consult with the respective Taharoa Marae and Te Runanga in the preparation of the various management plans that govern the management of effects at the mine. Such consultation and engagement benefits both parties – TIL will gain the benefit of access to the skills and expertise that reside within the marae and hapu whanau, while marae and hapu whanau will have the opportunity to influence the content of management plans that will play an important part in managing the ongoing effects of the mining activity. TIL will also propose the provision of a website

which includes monthly monitoring records to communicate data to mana whenua and the community.

5.1.7 Air Quality Effects

The mine is located in an isolated location subject to extreme westerly winds. In this environment, there is potential for wind-blown sand from the mine site to generate adverse effects on adjoining and adjacent sites to the mine, including in Taharoa Village. TIL implement a range of avoidance and mitigation techniques to control such emissions including the erection of fencing to trap sand particles, placing ground cover (for example, coconut matting) on exposed areas, using mobile and automated fixed watering systems on internal site roads, enforcing vehicle speed limits, and progressively rehabilitating mined out areas. These measures mean that the mine site can operate in accordance with the relevant permitted activity rule of the Waikato Regional Plan with regards to air quality. TIL proposes to implement a Dust Management Plan to manage the implementation of these dust prevention mechanisms. Although there remains the potential for off-site discharges of dust due to the coastal environment, these discharges are highly unlikely to result in adverse effects to human health. Acoustic Effects

The mining activities have the potential to have adverse noise effects on key sensitive receptors on sites adjoining the Northern Block (1891 Taharoa Road, 1891A Taharoa Road, Te Kōraha Marae and 25 Rotopuhoe Road). However, these receptors are located several hundred metres from where mining will occur on the Northern Block and given this separation distance, it is expected that the works will be able to be managed to comply with the Waitomo District Plan daytime and nighttime noise limits. As a result, any potential adverse effects from noise from mining on the Northern Block on sensitive receivers is expected to be **less than minor**.

Mining on the Central and Southern Blocks has been continuous since the 1970s and benefits from existing use rights with respect to noise levels and associated acoustic effects. Notwithstanding this, noise levels are expected to be compliant with District Plan noise limits. TIL will continue to adopt the best practicable option to ensure that the emission of noise from these blocks does not exceed a reasonable level for any nearby sensitive receptors.

5.2 Effects relating to the Central and Southern Blocks only

5.2.1 Effects of damming Wainui Stream

Authorisation of the dam in the Wainui Stream will result in a similar water regime to what is currently present. Fish passage will be provided for via the monitoring and maintenance of a fish pass which achieves the intended purpose of allowing grey mullet and other targeted species to be able to navigate upstream to Lake Taharoa. The downstream migration of juvenile native fish can be adequately addressed through consent conditions which include the retention of a minimum flow within the fish pass and downstream of the dam, as well as monitoring of fish pass performance. As a result, the effects of the dam on fish passage has been assessed as **negligible**.

5.2.2 Effects on water quantity

Water is extracted from the impounded section of the Wainui Stream for mining and shiploading processes. Separate water take consents are held for the mining and shiploading takes and the consents cannot be exercised at the same time. The mine is currently operating within the historically consented limits for water abstraction and no further water quantity is required for the continued operation of the mine. The Wainui Stream catchment is not over-allocated and there are

no permits held by any other party to take water from the stream. As a result, adverse water quantity effects are avoided.

5.2.3 Effects of water take on marginal wetlands

The proposed water takes have the potential to have adverse effects on marginal wetlands around the edges of Lake Taharoa. Noting that the wetlands have acclimated to the lake levels that have been experienced since the installation of the dam in the Wainui Stream in the early 1970's, the magnitude of these effects has been assessed as **low** given that the water takes will be operated in a similar manner to what has been historically occurred at the mine. Importantly, TIL is proposing to retain existing conditions that require water takes to cease if the lake levels reach a certain minimum point. Conditions will also be proposed that require ongoing monitoring of the lake margin wetlands and management responses to be implemented if the lake level remains low for an extended period and the wetlands show signs of stress (other than that caused by natural seasonal conditions).

5.2.4 Effects on benthic fauna

The proposed ship-loading infrastructure including pipelines on the seabed and the tethering mechanism for the SBM will continue to occupy part of the seabed and impact on a small amount of available subtidal sandflat habitat. Given the small percentage of the available subtidal sandflat habitat this represents, this is assessed as having a low magnitude of effect on benthic ecology. The effects of constructing the pipeline have also been assessed as being **low**.

5.2.5 Effects on fish and seafood species

The discharge from the ship loading process has the potential to have adverse effects on existing habitat for fish and seafood species. Given the relatively infrequent and short-term nature of the discharge and the highly mobile nature of fish species the potential adverse effects are assessed as **negligible**. The presence of green lipped mussels in the area of the discharge indicates that ongoing ship loading discharges do not inhibit mussel colonisation and has a **negligible** effect on seafood resource species.

5.2.6 Effects on marine mammals

A number of marine mammal species can be present in the wider marine area around Port Taharoa such as Māui dolphins, common dolphins, southern right whales and Orca/killer whales. Given the low level of risk posed by the ship loading operation and the fact that it has been occurring in the vicinity since the early 1970's, the overall risk of adverse effects for marine mammals is assessed as **negligible**. Nevertheless, to recognise the sensitivity of the marine mammals that traverse the area, TIL propose conditions that require an underwater noise survey to be undertaken if 35 ship visits occur in a 12 month period, in order to inform best practice underwater noise measures.

5.2.7 Effects on coastal processes

TIL seeks to continue the ability to discharge up to 75,000m³ per day of ship loading water, including freshwater and fine sediment, up to a maximum of 7,500,000m³ per year. As a result of dilution and dispersion of the sediment plume provided by oceanic conditions, the effect of this discharge on coastal processes has been assessed as being **less than minor**.

5.2.8 Effects of discharges in the Coastal Marine Area (CMA)

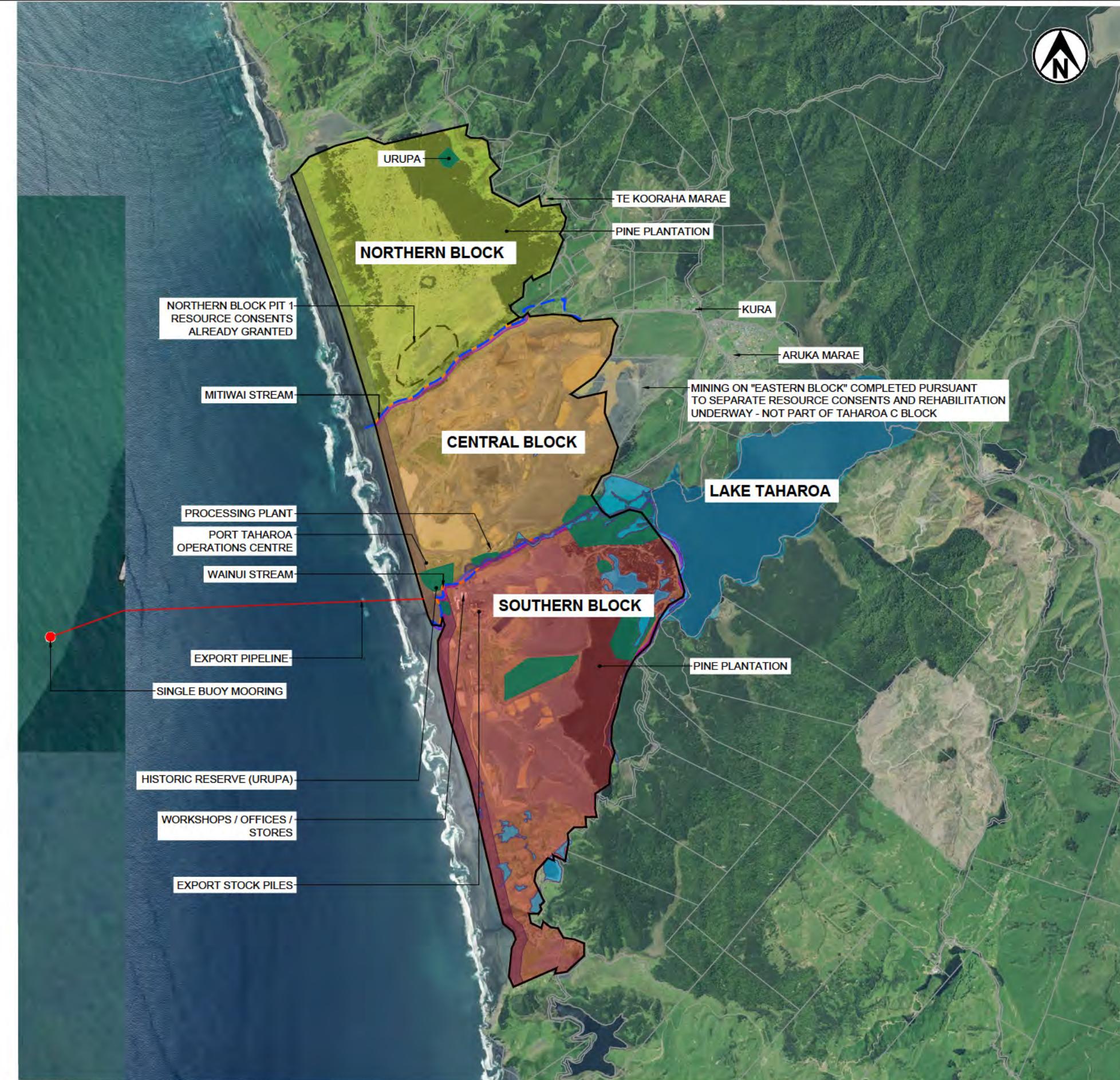
The potential adverse effects of the sediment discharge from the ship-loading events have been addressed above. The discharge includes some trace levels of naturally occurring contaminants in the ironsand that is pumped in slurry form into the ship. Because of the extremely low levels of the naturally occurring contaminants, and the dilution provided by the sea water, the discharge will not result in any measurable toxicity effect on benthic fauna.

TIL is seeking consent to continue to discharge excess process water and stormwater to the CMA at a rate of 32,000m³/day. This discharge occurs infrequently and when there is no suitable alternative to provide for the discharge on land - primarily at times of prolonged heavy rainfall. The potential ecological effects from the process water/stormwater discharge are likely to be even less than those of the ship loading discharge which were assessed to be less than minor. Correspondingly, no further actions to avoid, remedy or mitigate potential effects from the process wastewater and stormwater discharges are required apart from monitoring of the discharge quality and composition.

5.2.9 Effects on navigation safety

The continued ship movements to and from the Port of Taharoa and the occupation of the CMA by ship loading infrastructure have the potential to have adverse effects on navigational safety of other users of the CMA. However, the use of this area for recreational watercraft and commercial vessels is infrequent and the movement of ironsand export ships has been established in the area since the early 1970's. No more than one ship can access the mooring buoy at one time. Furthermore, the Port of Taharoa is operated in compliance with the New Zealand Port and Harbour Marine Safety Code, the Harbourmaster previously had no objection to the continued activity and several improvements have been implemented since the granting of the now expired resource consents in 2002. For these reasons, potential adverse effects on navigation safety have been assessed as **less than minor**.

LEGEND	
	STREAM
	PROPERTY BOUNDARIES
	MINING LICENCE AREA (TAHAROA C BLOCK)
	NORTHERN BLOCK
	CENTRAL BLOCK
	SOUTHERN BLOCK
	30m PERENNIAL WATER BODY / STREAM SETBACK
	100m MHWS SETBACK SUBJECT TO SURVEY
	ARCHEOLOGICAL AREAS RESERVED FROM MINING
	WETLAND



Holly-Marie Rearic

From: Harach, Olivia OH [REDACTED]
Sent: Wednesday, 25 June 2025 4:29 pm
To: Stephanie de Groot; Holly-Marie Rearic; Tim Fletcher
Subject: FW: Invitation to Ministry of Business, Innovation and Employment to meet or provide written feedback – Taharoa Ironsands Limited Fast-track Applications [MERWNZ-MERWLIB.FID900086]
Attachments: Consultation letter to the Ministry of Business Innovation and Employment dated 24 June 2025.pdf



Olivia Harach
Taharoa Ironsands Ltd

P [REDACTED]
E [REDACTED]

From: Harach, Olivia OH
Sent: Wednesday, 25 June 2025 4:28 pm
To: [REDACTED]; info@mbie.govt.nz
Cc: Coffey, Wayne WC [REDACTED]
Subject: Invitation to Ministry of Business, Innovation and Employment to meet or provide written feedback – Taharoa Ironsands Limited Fast-track Applications [MERWNZ-MERWLIB.FID900086]

Good afternoon

Please see the **attached** letter in relation to applications that TIL is preparing for the Central and Southern Block Project and Northern Block Project under the Fast-track Approvals Act 2024.

The purpose of the letter is to offer MBIE the opportunity to discuss the applications with TIL and/or to provide written feedback on the applications, if MBIE seeks to do so.

Please let me know if you have any queries.

Regards
Wayne



Taharoa Ironsands Ltd

24 June 2025

BY EMAIL: info@mbie.govt.nz & [REDACTED]

Ministry of Business, Innovation and Employment
15 Stout Street
Wellington Central, Wellington

Taharoa Ironsands Limited – Fast-track Approvals Act 2024 applications

1. Taharoa Ironsands Limited (**TIL**) owns and operates the Taharoa Ironsand Mine which has been in operation since 1973 and accesses the largest iron sand deposit in New Zealand.
2. The Mine is divided into blocks known as the Northern, Central and Southern Block which are all located on Taharoa C Block, as well as the Eastern Blocks and the Te Mania Extension which are located on adjoining land.
3. The following two projects are listed in Schedule 2 of the Fast-track Approvals Act 2024 (**FTAA**):
 - (a) Central & Southern Block Mining Project: TIL needs to replace its resource consents relating to these blocks to continue operating the existing Mine. TIL made an application under the standard resource consenting process under the Resource Management Act 1991 (**RMA**). The consenting process was lengthy and TIL was not satisfied with the decision, which led it to appeal the decision to the Environment Court on 12 December 2024. Since the appeal was filed, the FTAA has been enacted. This provides an alternative, and suitable, pathway for TIL to apply for the necessary approvals for the Central and Southern Blocks.
 - (b) Northern Block Mining Project: TIL also seeks to expand its existing operations into the Northern Block of the mining area. This project has also been directly referred by the Government to utilise the Fast-track process on account of its regional and national significance.
4. We are now preparing our substantive applications for both projects. We are intending to file the applications with the Environmental Protection Agency in June/July 2025. Enviser is managing the preparation of the applications on behalf of TIL with input from a range of technical consultants, including Grant Eccles (planner) of Tonkin & Taylor Limited. Tonkin & Taylor has provided a high-level summary of what will be sought in each application in **Appendix A**.
5. We are writing to provide you with an opportunity to discuss the applications while they are being prepared. We are otherwise open to receiving written feedback if you choose to do so and would appreciate if that could be provided by 11 July 2025.

6. If you would like to discuss the applications with us or provide written feedback, please let us know using the following email address: [REDACTED]

Yours faithfully



Wayne Coffey
Managing Director and CEO of Taharoa Ironsands Limited

Appendix A

Taharoa Ironsands Mine – Project summary for pre-application consultation

- **Northern Block Mining Project**
- **Central and Southern Block Mining Project**

1 Overview

Taharoa Ironsands Limited (TIL) operate an iron sand mine at Taharoa, on the West Coast of the North Island, approximately 8 km south of Kawhia Harbour. The Taharoa Mine has been in operation since 1973 (owned by New Zealand Steel until 2017). The mine site covers an area of approximately 1,300 hectares, primarily on Māori land legally described as the Taharoa C Block and the part of the coastal marine area (CMA) legally defined as Port Taharoa (**mine**).

For the purposes of mining activity, Taharoa C Block is divided into blocks. As shown on the attached plan:

- (a) the area of the site to the north of the Mitiwai Stream is known as the Northern Block.
- (b) the area of the site between the Mitiwai Stream and the Wainui Stream is known as the Central Block; and
- (c) the area of the site to the south of the Wainui Stream is known as the Southern Block.

The Central and Southern Blocks are currently operated under a suite of resource consents granted in 2006.¹ Mining activity has not historically occurred in the Northern Block.

TIL is now preparing applications for the necessary resource consents, wildlife permits and archaeological authorities under the Fast-track Approvals Act 2024 (FTAA) to authorise:

- the extraction of sand (and associated activities) on the Northern Block (known as the Northern Block Mining Project); and
- the continuation of sand extraction (and associated activities which support the entire mine, including its export operation) on the Central and Southern Blocks and in the CMA (known as the Central and Southern Block Mining Project).

The following describes the proposed mining and associated works which are subject to the applications, details the resource consents and approvals sought and provides a high-level summary of the potential effects on the environment of each project at this stage. As the applications are currently being prepared, this information is based on the work completed as of 01 May 2025, and is subject to change.

¹ TIL also hold separate resource consents for mining of (i) the “Eastern Block” granted in 2018 (mining now completed and rehabilitation underway), and (ii) the “Te Mania Extension” adjoining the Eastern Block granted in 2022 (mining yet to commence), and (iii) a small area in the Northern Block known as “Pit 1” granted in late 2024 (mining currently in progress). Mining at these locations relies on the water take resource consents and the coastal permits granted for the Central and Southern Blocks.

2 Description of proposed works

TIL propose to mine ironsand throughout the Northern, Central and Southern Blocks excluding areas where mining restrictions will apply. The areas where mining activity will not take place are within 100 m of Mean High Water Springs, 30 m of perennial water bodies (Mitiwai Stream, Wainui Stream and Lake Taharoa), and within already identified urupa and archaeological re-interment areas on the mine. Other mining exclusion areas may be identified as part of the completion of technical assessments that are currently underway. Any additional mining exclusion areas that are identified by the technical assessments will be included in the substantive FTAA applications.

Whilst the process to extract, process and export the ironsand can and does vary depending on the nature of the deposit being mined at the time, it follows the same broad steps. These activities, which are sought to be authorised as part of the Central and Southern Block Project, include:

1. **Vegetation, topsoil and overburden removal, including harvesting of trees with commercial value (pines).** Useful native species are removed prior to stripping of topsoil for use in the eco-sourced nursery on site. Topsoil is stockpiled on-site for use in future rehabilitation activities.
2. **Extraction and processing of Ironsand.** Raw Ironsand is extracted using various methods and equipment depending on ground conditions. In upper layers, standard earthmoving machinery such as excavators, bulldozers, and trucks are used to collect the ironsand and deposit it into a Dry Mining Unit (DMU). The DMU mixes the ironsand with water to form a slurry, which is then pumped to a treatment plant for titanomagnetite extraction.
3. During this process, groundwater and surface water may enter the active excavation area. To maintain dry working conditions, this water may be pumped out as required. However, as mining progresses to deeper layers, maintaining a dry pit may become impractical. In such cases, a cutter-suction dredge is used in a water-filled pond. The dredge floats on the water and uses a submerged dredge head to cut, fluidise, and pump the Ironsand slurry through a pipeline to the treatment plant. The dredge is capable of operating at depths of 8 to 15 meters below the pond surface. In some instances, a long-reach excavator may also be used to extract material from within the pond.
4. **Processing.** The extracted ironsand is transported to a centralised processing plant where it is concentrated and processed. The ironsand is refined using screening and gravity separation. The ironsand is mixed into a slurry and pumped through a seabed pipeline to a bulk carrier ship moored at the Port of Taharoa. The export pipelines run from the processing and storage facility located on land to a Single Buoy Mooring (SBM), located approximately 3.5 km offshore.
5. **Ship loading and dewatering.** Bulk carrier ships moor at the SBM to receive the ironsand in slurry form from the export pipelines. Each ship contains dewatering equipment and the resulting freshwater, containing residual fine suspended material (inert, inorganic geological material) that is removed from the ironsand slurry, is discharged from the ship to the sea. The discharge forms a buoyant plume that floats on the seawater surface before dispersal and dilution. Ship loading operations are currently undertaken approximately 20 times per year and will increase in frequency in future as production increases up to a projected maximum of 35 times per year. Each ship loading activity takes approximately 90 hours (of pumping time) however weather conditions have an influence on loading timeframes.

6. **Tailings disposal and rehabilitation of mined areas.** The tailings (ferrous and non-ferrous sand, silts and clays) which are separated from the exportable product are pumped as a slurry to tailings disposal areas. The discharged slurry dewateres by gravity, with the drainage water collected and directed into a settlement pond or ponds. Once the tailings have dewatered, mechanical plant (excavators and dozers) redistribute the material to form the grade and levels required by the rehabilitation plan for that area. Following this the land may be stabilised, top soiled and replanted.

To operate the mine, the process requires the abstraction of water from the Wainui Stream via a constructed dam incorporating a fish pass, and the discharge of stormwater to the Wainui Stream and the discharge of process water to settling ponds. Excess stormwater and process water is discharged to the CMA via the ship loading pipelines.

The activities sought to be authorised as part of the Northern Block Mining Project include (but are not limited to):

- (a) vegetation, topsoil and overburden removal, and excavation and processing of iron sand above and below the water table (as above);
- (b) the transportation of that product via temporary pipelines to the established processing plant on the Central and Southern Block;
- (c) processing (as above);
- (d) discharge of process water to land; and
- (e) tailing disposal and rehabilitation of mined areas (as above).

The Northern Block Mining Project will rely on / be supported by the processing infrastructure located on the Central and Southern Blocks. It will also rely on / be supported by the consents being sought for the Central and Southern Block to take and use water from the Wainui Stream, discharge of stormwater to the Wainui Stream and the CMA, discharge of process water to the CMA and transport of processed product from the processing facility through the ship-loading pipelines to the CMA. No changes are being proposed to the existing water take limits and discharge limits to facilitate mining of the Northern Block.

3 Approvals sought

3.1 Resource Management Act 1991

A summary of the resource consents that are required for the Northern, Central and Southern Blocks is set out below.

3.1.1 Resource consents required for the Northern Block

National Environmental Standard for Freshwater 2020 – consents to clear vegetation and undertake earthworks within and within 10m of a natural inland wetland. Consents are also required to take, use, dam, or divert water within and within 100 m of a natural inland wetland and to discharge water within and within 100 m of a natural inland wetland.

National Environmental Standard for Commercial Forestry 2017 – consent to harvest pine trees within Class 8e land.

Operative Waikato Regional Plan – consents for soil disturbance and vegetation clearance activities, diversion and taking of groundwater and surface of water associated with mining above and below the water table, discharge of a contaminant to land or water (process water and placement of tailings) and for overburden disposal to land.

Additionally, resource consent is required under the Operative Waitomo District Plan for the potential disturbance of archaeological sites recorded in the Plan - this consent applies to the Northern Block only given that mining has occurred since the early 1970's on the Central and Southern Blocks.

3.1.2 Resource consents required for the Central and Southern Blocks

The resource consents set out above are also required for the Central and Southern Blocks.² In addition, the following resource consents are required for the Central and Southern Blocks Project:

Operative Waikato Regional Plan – consents for the damming, diversion and taking of surface water and groundwater, for stream bed disturbance, and for the discharge of stormwater to surface water.

Operative and Proposed Waikato Regional Coastal Plans – consents for the use and occupation of the Coastal Marine Area by the export pipelines and the SBM, for discharges to and depositions in the CMA from shiploading activities, and for the discharge of stormwater from the export pipelines.

3.2 Wildlife Act 1953

A wildlife permit will be required to manage lizards if they are identified prior to vegetation removal or ground disturbance works.

3.3 Heritage New Zealand Pouhere Taonga Act 2014

Archaeological authorities will be sought due to the potential for currently undiscovered archaeological features to be disturbed by mining activities (excluding urupa and archaeological areas reserved from mining which will not be disturbed).

4 Benefits of the Projects

The continuation of the mining activity on the Taharoa C Block that will be facilitated by the approvals sought under the FTAA will generate significant regional and national benefits. The Central and Southern Block Mining Project and Northern Block Project will directly contribute billions to the New Zealand economy (through employment, income for landowners, business for regional supplies and the payment of taxes).

The mine provides significant employment opportunities for the community, particularly local Māori. Over 82% of income earned by local Ngāti Mahuta comes from employment at the mine. TIL has a core workforce of 170-80 people but employs upwards of 300 staff and contractors.

TIL relies on locally sourced goods and services including the supply of electricity and services from surrounding areas including Kawhia, Te Kuiti, Otorohanga, Te Awamutu and Hamilton. TIL also relies on specialist sub-contractor support including the maintenance and management of specialised mine machinery and equipment. The support TIL relies on (and will continue to rely on) from

² Excluding the resource consent required for archaeological site disturbance.

surrounding centres for the Northern Block Project and Central and Southern Block Mining Project will inject billions into the local economy over the life of the consents sought for the Project.

The mine also provides essential benefits to the local Taharoa Village which was established around the mine and exists today because of the substantial financial contribution the mine makes every year.

5 Summary of potential adverse effects on the environment

The following high-level summary of effects on the environment is based on technical assessments previously completed in relation to mining of the Central and Southern blocks. These assessments are currently being updated, and additional assessments are being completed for mining of the Northern Block. A full assessment of effects supported by technical assessments will be included in the applications for the Northern and Central/Southern Blocks respectively.

5.1 Effects common to the Northern, Central and Southern Blocks

5.1.1 Effects on terrestrial ecology (including bats, birds, lizards)

Disturbance from mining activities has the potential to have adverse effects on wetland and grassland bird species. The loss of existing grassland due to the mining activity may also result in potential injury or death of various threatened native skink present in low numbers in the grassland. The overall level of effect on terrestrial ecology has been assessed as being **low** with the provision of an over-arching Environmental Management Plan (EMP), including an Avifauna Management Plan, Bat Management Plan and a Lizard Management Plan, and imposition of appropriate conditions such as a requirement for there to be a 30 m planting buffer around all natural water bodies. Subject to the imposition of conditions, the overall level of effects on terrestrial ecology has been assessed as **minor**.

5.1.2 Effects of mining below the water table

When mining activity interacts with groundwater there may be the potential for adverse effects on surface freshwater bodies if there is a hydraulic connection between the groundwater and surface water. This connection will be carefully monitored. Any adverse effects on the primary freshwater bodies on the site (the Mitiwai Stream and the Wainui Stream) can be avoided and mitigated through consent conditions including for example, requirements to maintain a minimum flow within the streams.

5.1.3 Effects of discharge to land

The discharge of tailings and surplus process water to land has the potential to cause adverse effects on landform, groundwater and nearby waterways. The tailings material is re-formed as close as practicable to the original landform. The discharge of surplus process water does not result in contamination of groundwater due to the natural filtering provided by the sandy ground conditions. Overall, the adverse effects of discharges to land have been assessed as **less than minor**.

5.1.4 Land disturbance effects

The mining operation is located in a high-risk erosion area and the mining and stockpiling of iron sand has the potential to result in adverse effects on land stability. Given that the mine has a good operational history with no erosion issues requiring mitigation, a rehabilitation process and

revegetation plan is followed for disturbed areas, and perennial waterbody mining setbacks are imposed, any adverse effects can be considered **negligible**.

5.1.5 Archaeological effects

Taharoa C Block is and has always been Māori land which means that there is elevated potential for accidental discovery of koi iwi and other taonga in the dune environment of the area. Ngāti Mahuta derived tikanga and protocols apply when discoveries of koiwi and taonga occur in the Taharoa dune environment as a result of mining activity, and that tikanga/protocol is reflected in existing and proposed consent conditions. Defined urupā are located within the dune system where accidentally discovered koiwi are interred with appropriate tikanga being observed. A buffer in which no mining occurs is observed around each urupā.

All of these measures and practices will continue and mitigate the potential adverse effects in relation to archaeology to **less than minor** levels.

5.1.6 Cultural effects

In considering cultural effects, it is important to note the cultural benefits the ongoing operation of the mine has for Ngati Mahuta as tangata whenua. These benefits include employment benefits, royalties, and support for the local community. Ngati Mahuta, though the Taharoa C Block Incorporation, own the land on which the mine operates and is paid significant royalties from the mine. The mine also supports the employment and growth of Ngati Mahuta whanau. The local employment opportunity generated by the mine has allowed the local community to retain members of the community who may have otherwise moved away to seek employment elsewhere and lost their connection to the land.

TIL understand the views of the respective Taharoa Marae and Te Runanga in relation to the potential cultural effects of the Central and Southern Block Project. In summary, at a high-level:

The damming of the Wainui Stream has the potential to have adverse effects on the health of Lake Taharoa and its indigenous fishery, an important matter to Ngāti Mahuta. The maintenance of the effectiveness of the fish pass at the dam in the Wainui Stream is important to ensure the presence of indigenous fish species in the stream and lake upstream of the dam continues.

The maintenance and monitoring of baseflow in the Mitiwai Stream is also an important matter from a cultural perspective. TIL has engaged expert consultants to monitor the stream to ensure that TIL understands the potential effects of its mining activity on the Stream, which will be managed through consent conditions. Rehabilitation of the mine site to a sustainable landform and land cover is also an important matter to Ngāti Mahuta. Representatives of Ngāti Mahuta have shared their desire for the land to be returned to its natural state following mining activity (being rolling sand dunes with some pockets of vegetation). In that regard, TIL has developed and is implementing an overall Site Rehabilitation Plan and updated Conceptual Site Closure Plan in place to be implemented in the event that the mine closes in the future.

TIL propose to consult with the respective Taharoa Marae and Te Runanga in the preparation of the various management plans that govern the management of effects at the mine. Such consultation and engagement benefits both parties – TIL will gain the benefit of access to the skills and expertise that reside within the marae and hapu whanau, while marae and hapu whanau will have the opportunity to influence the content of management plans that will play an important part in managing the ongoing effects of the mining activity. TIL will also propose the provision of a website

which includes monthly monitoring records to communicate data to mana whenua and the community.

5.1.7 Air Quality Effects

The mine is located in an isolated location subject to extreme westerly winds. In this environment, there is potential for wind-blown sand from the mine site to generate adverse effects on adjoining and adjacent sites to the mine, including in Taharoa Village. TIL implement a range of avoidance and mitigation techniques to control such emissions including the erection of fencing to trap sand particles, placing ground cover (for example, coconut matting) on exposed areas, using mobile and automated fixed watering systems on internal site roads, enforcing vehicle speed limits, and progressively rehabilitating mined out areas. These measures mean that the mine site can operate in accordance with the relevant permitted activity rule of the Waikato Regional Plan with regards to air quality. TIL proposes to implement a Dust Management Plan to manage the implementation of these dust prevention mechanisms. Although there remains the potential for off-site discharges of dust due to the coastal environment, these discharges are highly unlikely to result in adverse effects to human health. Acoustic Effects

The mining activities have the potential to have adverse noise effects on key sensitive receptors on sites adjoining the Northern Block (1891 Taharoa Road, 1891A Taharoa Road, Te Kōraha Marae and 25 Rotopuhoe Road). However, these receptors are located several hundred metres from where mining will occur on the Northern Block and given this separation distance, it is expected that the works will be able to be managed to comply with the Waitomo District Plan daytime and nighttime noise limits. As a result, any potential adverse effects from noise from mining on the Northern Block on sensitive receivers is expected to be **less than minor**.

Mining on the Central and Southern Blocks has been continuous since the 1970s and benefits from existing use rights with respect to noise levels and associated acoustic effects. Notwithstanding this, noise levels are expected to be compliant with District Plan noise limits. TIL will continue to adopt the best practicable option to ensure that the emission of noise from these blocks does not exceed a reasonable level for any nearby sensitive receptors.

5.2 Effects relating to the Central and Southern Blocks only

5.2.1 Effects of damming Wainui Stream

Authorisation of the dam in the Wainui Stream will result in a similar water regime to what is currently present. Fish passage will be provided for via the monitoring and maintenance of a fish pass which achieves the intended purpose of allowing grey mullet and other targeted species to be able to navigate upstream to Lake Taharoa. The downstream migration of juvenile native fish can be adequately addressed through consent conditions which include the retention of a minimum flow within the fish pass and downstream of the dam, as well as monitoring of fish pass performance. As a result, the effects of the dam on fish passage has been assessed as **negligible**.

5.2.2 Effects on water quantity

Water is extracted from the impounded section of the Wainui Stream for mining and shiploading processes. Separate water take consents are held for the mining and shiploading takes and the consents cannot be exercised at the same time. The mine is currently operating within the historically consented limits for water abstraction and no further water quantity is required for the continued operation of the mine. The Wainui Stream catchment is not over-allocated and there are

no permits held by any other party to take water from the stream. As a result, adverse water quantity effects are avoided.

5.2.3 Effects of water take on marginal wetlands

The proposed water takes have the potential to have adverse effects on marginal wetlands around the edges of Lake Taharoa. Noting that the wetlands have acclimated to the lake levels that have been experienced since the installation of the dam in the Wainui Stream in the early 1970's, the magnitude of these effects has been assessed as **low** given that the water takes will be operated in a similar manner to what has been historically occurred at the mine. Importantly, TIL is proposing to retain existing conditions that require water takes to cease if the lake levels reach a certain minimum point. Conditions will also be proposed that require ongoing monitoring of the lake margin wetlands and management responses to be implemented if the lake level remains low for an extended period and the wetlands show signs of stress (other than that caused by natural seasonal conditions).

5.2.4 Effects on benthic fauna

The proposed ship-loading infrastructure including pipelines on the seabed and the tethering mechanism for the SBM will continue to occupy part of the seabed and impact on a small amount of available subtidal sandflat habitat. Given the small percentage of the available subtidal sandflat habitat this represents, this is assessed as having a low magnitude of effect on benthic ecology. The effects of constructing the pipeline have also been assessed as being **low**.

5.2.5 Effects on fish and seafood species

The discharge from the ship loading process has the potential to have adverse effects on existing habitat for fish and seafood species. Given the relatively infrequent and short-term nature of the discharge and the highly mobile nature of fish species the potential adverse effects are assessed as **negligible**. The presence of green lipped mussels in the area of the discharge indicates that ongoing ship loading discharges do not inhibit mussel colonisation and has a **negligible** effect on seafood resource species.

5.2.6 Effects on marine mammals

A number of marine mammal species can be present in the wider marine area around Port Taharoa such as Māui dolphins, common dolphins, southern right whales and Orca/killer whales. Given the low level of risk posed by the ship loading operation and the fact that it has been occurring in the vicinity since the early 1970's, the overall risk of adverse effects for marine mammals is assessed as **negligible**. Nevertheless, to recognise the sensitivity of the marine mammals that traverse the area, TIL propose conditions that require an underwater noise survey to be undertaken if 35 ship visits occur in a 12 month period, in order to inform best practice underwater noise measures.

5.2.7 Effects on coastal processes

TIL seeks to continue the ability to discharge up to 75,000m³ per day of ship loading water, including freshwater and fine sediment, up to a maximum of 7,500,000m³ per year. As a result of dilution and dispersion of the sediment plume provided by oceanic conditions, the effect of this discharge on coastal processes has been assessed as being **less than minor**.

5.2.8 Effects of discharges in the Coastal Marine Area (CMA)

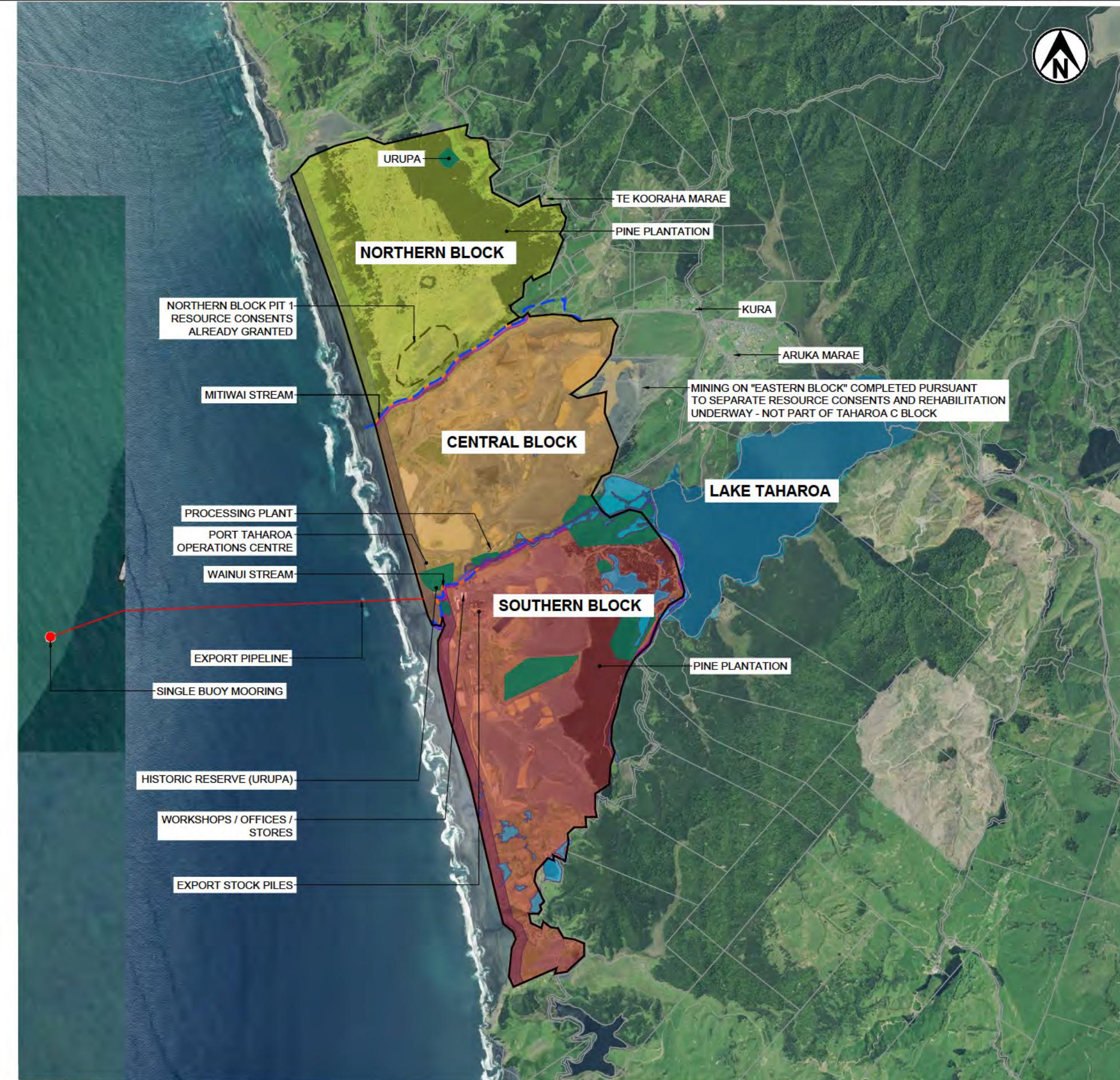
The potential adverse effects of the sediment discharge from the ship-loading events have been addressed above. The discharge includes some trace levels of naturally occurring contaminants in the ironsand that is pumped in slurry form into the ship. Because of the extremely low levels of the naturally occurring contaminants, and the dilution provided by the sea water, the discharge will not result in any measurable toxicity effect on benthic fauna.

TIL is seeking consent to continue to discharge excess process water and stormwater to the CMA at a rate of 32,000m³/day. This discharge occurs infrequently and when there is no suitable alternative to provide for the discharge on land - primarily at times of prolonged heavy rainfall. The potential ecological effects from the process water/stormwater discharge are likely to be even less than those of the ship loading discharge which were assessed to be less than minor. Correspondingly, no further actions to avoid, remedy or mitigate potential effects from the process wastewater and stormwater discharges are required apart from monitoring of the discharge quality and composition.

5.2.9 Effects on navigation safety

The continued ship movements to and from the Port of Taharoa and the occupation of the CMA by ship loading infrastructure have the potential to have adverse effects on navigational safety of other users of the CMA. However, the use of this area for recreational watercraft and commercial vessels is infrequent and the movement of ironsand export ships has been established in the area since the early 1970's. No more than one ship can access the mooring buoy at one time. Furthermore, the Port of Taharoa is operated in compliance with the New Zealand Port and Harbour Marine Safety Code, the Harbourmaster previously had no objection to the continued activity and several improvements have been implemented since the granting of the now expired resource consents in 2002. For these reasons, potential adverse effects on navigation safety have been assessed as **less than minor**.

LEGEND	
	STREAM
	PROPERTY BOUNDARIES
	MINING LICENCE AREA (TAHAROA C BLOCK)
	NORTHERN BLOCK
	CENTRAL BLOCK
	SOUTHERN BLOCK
	30m PERENNIAL WATER BODY / STREAM SETBACK
	100m MHWS SETBACK SUBJECT TO SURVEY
	ARCHEOLOGICAL AREAS RESERVED FROM MINING
	WETLAND



Holly-Marie Rearic

From: Coffey, Wayne WC [REDACTED]
Sent: Monday, 23 June 2025 10:27 am
To: Holly-Marie Rearic
Subject: Fwd: Invitation to provide written feedback – Taharoa Ironsands Limited Fast-track Applications
Attachments: Consultation letter to Roy Wetini and whanau dated 21 May 2025.pdf

Categories: Important

Sent from my iPad

Begin forwarded message:

From: "Coffey, Wayne WC" [REDACTED]
Date: 26 May 2025 at 12:27:38 PM NZST
To: [REDACTED]
Subject: Invitation to provide written feedback – Taharoa Ironsands Limited Fast-track Applications

Good afternoon Roy and Teina

Please see the **attached** letter in relation to applications that TIL is preparing for the Central and Southern Block Project and Northern Block Project under the Fast-track Approvals Act 2024.

We have previously engaged with you in respect of our RMA application for the Central and Southern Blocks. We want to provide you with the opportunity to provide further feedback on TIL's Fast-track applications.

Regards

Wayne



Taharoa Ironsands Ltd

21 May 2025

BY EMAIL: [REDACTED]

Roy Wetini and Whānau
[REDACTED]

Dear Roy, Teina, and Wetini Whānau

Taharoa Ironsands Limited – Fast-track Approvals Act 2024 applications

1. As you know, Taharoa Ironsands Limited (**TIL**) owns and operates the Taharoa Ironsand Mine which has been in operation since 1973.
2. The Mine is divided into blocks known as the Northern, Central and Southern Block which are all located on Taharoa C Block, as well as the Eastern Blocks and the Te Mania Extension which are located on adjoining land.
3. TIL needs to replace its resource consents relating to the Central and Southern Blocks to continue operating the existing Mine and to enable expansion of the Mine in the future. TIL sought to do so by making an application in 2020 under the standard resource consenting process under the Resource Management Act 1991 (**RMA**). The consenting process under the RMA was lengthy and TIL was not satisfied with the decision, which led it to appeal the decision to the Environment Court on 12 December 2024.
4. Since the appeal was filed, the Fast-track Approvals Act 2024 (**FTAA**) has been enacted. The FTAA establishes a fast-track environmental approvals regime for projects of national and regional significance in New Zealand.
5. The reconsenting of the Central and Southern Blocks of the Mine has been recognised by the Government as having regional and national significance and has been directly referred to utilise the Fast-Track approval process. The FTAA therefore provides an alternative, and suitable, consenting pathway for TIL to apply for the resource consenting process for the Central and Southern Blocks. New mining of the Northern Block has also been directly referred by the Government to utilise the Fast-track process on account of its regional and national significance.
6. We are now preparing our substantive applications for both projects which will be considered under the FTAA. We are intending to file the applications with the Environmental Protection Agency in June/July 2025. Enviser is managing the preparation of the applications on behalf of TIL with input from a range of technical consultants, including Grant Eccles (planner) of Tonkin & Taylor Limited. Tonkin & Taylor has provided a high-level summary of what will be sought in each application in **Appendix A**.
7. We have previously engaged with you in respect of our application under the RMA for the Central and Southern Blocks, and you participated in the hearing of that application. TIL understands your view in respect of the Mine and the consenting of the Central and Southern Blocks from that process. However, we are writing to provide you with an opportunity to provide further written feedback on the FTAA applications, while they are being prepared.

8. If you would like to provide written feedback, please let us know using the following email address: [REDACTED]. We would appreciate that written feedback is provided by 10 June 2025.

Yours faithfully



Wayne Coffey
Managing Director and CEO of Taharoa Ironsands Limited

Appendix A

Taharoa Ironsands Mine – Project summary for pre-application consultation

- **Northern Block Mining Project**
- **Central and Southern Block Mining Project**

1 Overview

Taharoa Ironsands Limited (TIL) operate an iron sand mine at Taharoa, on the West Coast of the North Island, approximately 8 km south of Kawhia Harbour. The Taharoa Mine has been in operation since 1973 (owned by New Zealand Steel until 2017). The mine site covers an area of approximately 1,300 hectares, primarily on Māori land legally described as the Taharoa C Block and the part of the coastal marine area (CMA) legally defined as Port Taharoa (**mine**).

For the purposes of mining activity, Taharoa C Block is divided into blocks. As shown on the attached plan:

- (a) the area of the site to the north of the Mitiwai Stream is known as the Northern Block.
- (b) the area of the site between the Mitiwai Stream and the Wainui Stream is known as the Central Block; and
- (c) the area of the site to the south of the Wainui Stream is known as the Southern Block.

The Central and Southern Blocks are currently operated under a suite of resource consents granted in 2006.¹ Mining activity has not historically occurred in the Northern Block.

TIL is now preparing applications for the necessary resource consents, wildlife permits and archaeological authorities under the Fast-track Approvals Act 2024 (FTAA) to authorise:

- the extraction of sand (and associated activities) on the Northern Block (known as the Northern Block Mining Project); and
- the continuation of sand extraction (and associated activities which support the entire mine, including its export operation) on the Central and Southern Blocks and in the CMA (known as the Central and Southern Block Mining Project).

The following describes the proposed mining and associated works which are subject to the applications, details the resource consents and approvals sought and provides a high-level summary of the potential effects on the environment of each project at this stage. As the applications are currently being prepared, this information is based on the work completed as of 01 May 2025, and is subject to change.

¹ TIL also hold separate resource consents for mining of (i) the “Eastern Block” granted in 2018 (mining now completed and rehabilitation underway), and (ii) the “Te Mania Extension” adjoining the Eastern Block granted in 2022 (mining yet to commence), and (iii) a small area in the Northern Block known as “Pit 1” granted in late 2024 (mining currently in progress). Mining at these locations relies on the water take resource consents and the coastal permits granted for the Central and Southern Blocks.

2 Description of proposed works

TIL propose to mine ironsand throughout the Northern, Central and Southern Blocks excluding areas where mining restrictions will apply. The areas where mining activity will not take place are within 100 m of Mean High Water Springs, 30 m of perennial water bodies (Mitiwai Stream, Wainui Stream and Lake Taharoa), and within already identified urupa and archaeological re-interment areas on the mine. Other mining exclusion areas may be identified as part of the completion of technical assessments that are currently underway. Any additional mining exclusion areas that are identified by the technical assessments will be included in the substantive FTAA applications.

Whilst the process to extract, process and export the ironsand can and does vary depending on the nature of the deposit being mined at the time, it follows the same broad steps. These activities, which are sought to be authorised as part of the Central and Southern Block Project, include:

1. **Vegetation, topsoil and overburden removal, including harvesting of trees with commercial value (pines).** Useful native species are removed prior to stripping of topsoil for use in the eco-sourced nursery on site. Topsoil is stockpiled on-site for use in future rehabilitation activities.
2. **Extraction and processing of Ironsand.** Raw Ironsand is extracted using various methods and equipment depending on ground conditions. In upper layers, standard earthmoving machinery such as excavators, bulldozers, and trucks are used to collect the ironsand and deposit it into a Dry Mining Unit (DMU). The DMU mixes the ironsand with water to form a slurry, which is then pumped to a treatment plant for titanomagnetite extraction.
3. During this process, groundwater and surface water may enter the active excavation area. To maintain dry working conditions, this water may be pumped out as required. However, as mining progresses to deeper layers, maintaining a dry pit may become impractical. In such cases, a cutter-suction dredge is used in a water-filled pond. The dredge floats on the water and uses a submerged dredge head to cut, fluidise, and pump the Ironsand slurry through a pipeline to the treatment plant. The dredge is capable of operating at depths of 8 to 15 meters below the pond surface. In some instances, a long-reach excavator may also be used to extract material from within the pond.
4. **Processing.** The extracted ironsand is transported to a centralised processing plant where it is concentrated and processed. The ironsand is refined using screening and gravity separation. The ironsand is mixed into a slurry and pumped through a seabed pipeline to a bulk carrier ship moored at the Port of Taharoa. The export pipelines run from the processing and storage facility located on land to a Single Buoy Mooring (SBM), located approximately 3.5 km offshore.
5. **Ship loading and dewatering.** Bulk carrier ships moor at the SBM to receive the ironsand in slurry form from the export pipelines. Each ship contains dewatering equipment and the resulting freshwater, containing residual fine suspended material (inert, inorganic geological material) that is removed from the ironsand slurry, is discharged from the ship to the sea. The discharge forms a buoyant plume that floats on the seawater surface before dispersal and dilution. Ship loading operations are currently undertaken approximately 20 times per year and will increase in frequency in future as production increases up to a projected maximum of 35 times per year. Each ship loading activity takes approximately 90 hours (of pumping time) however weather conditions have an influence on loading timeframes.

6. **Tailings disposal and rehabilitation of mined areas.** The tailings (ferrous and non-ferrous sand, silts and clays) which are separated from the exportable product are pumped as a slurry to tailings disposal areas. The discharged slurry dewateres by gravity, with the drainage water collected and directed into a settlement pond or ponds. Once the tailings have dewatered, mechanical plant (excavators and dozers) redistribute the material to form the grade and levels required by the rehabilitation plan for that area. Following this the land may be stabilised, top soiled and replanted.

To operate the mine, the process requires the abstraction of water from the Wainui Stream via a constructed dam incorporating a fish pass, and the discharge of stormwater to the Wainui Stream and the discharge of process water to settling ponds. Excess stormwater and process water is discharged to the CMA via the ship loading pipelines.

The activities sought to be authorised as part of the Northern Block Mining Project include (but are not limited to):

- (a) vegetation, topsoil and overburden removal, and excavation and processing of ironsand above and below the water table (as above);
- (b) the transportation of that product via temporary pipelines to the established processing plant on the Central and Southern Block;
- (c) processing (as above);
- (d) discharge of process water to land; and
- (e) tailing disposal and rehabilitation of mined areas (as above).

The Northern Block Mining Project will rely on / be supported by the processing infrastructure located on the Central and Southern Blocks. It will also rely on / be supported by the consents being sought for the Central and Southern Block to take and use water from the Wainui Stream, discharge of stormwater to the Wainui Stream and the CMA, discharge of process water to the CMA and transport of processed product from the processing facility through the ship-loading pipelines to the CMA. No changes are being proposed to the existing water take limits and discharge limits to facilitate mining of the Northern Block.

3 Approvals sought

3.1 Resource Management Act 1991

A summary of the resource consents that are required for the Northern, Central and Southern Blocks is set out below.

3.1.1 Resource consents required for the Northern Block

National Environmental Standard for Freshwater 2020 – consents to clear vegetation and undertake earthworks within and within 10m of a natural inland wetland. Consents are also required to take, use, dam, or divert water within and within 100 m of a natural inland wetland and to discharge water within and within 100 m of a natural inland wetland.

National Environmental Standard for Commercial Forestry 2017 – consent to harvest pine trees within Class 8e land.

Operative Waikato Regional Plan – consents for soil disturbance and vegetation clearance activities, diversion and taking of groundwater and surface of water associated with mining above and below the water table, discharge of a contaminant to land or water (process water and placement of tailings) and for overburden disposal to land.

Additionally, resource consent is required under the Operative Waitomo District Plan for the potential disturbance of archaeological sites recorded in the Plan - this consent applies to the Northern Block only given that mining has occurred since the early 1970's on the Central and Southern Blocks.

3.1.2 Resource consents required for the Central and Southern Blocks

The resource consents set out above are also required for the Central and Southern Blocks.² In addition, the following resource consents are required for the Central and Southern Blocks Project:

Operative Waikato Regional Plan – consents for the damming, diversion and taking of surface water and groundwater, for stream bed disturbance, and for the discharge of stormwater to surface water.

Operative and Proposed Waikato Regional Coastal Plans – consents for the use and occupation of the Coastal Marine Area by the export pipelines and the SBM, for discharges to and depositions in the CMA from shiploading activities, and for the discharge of stormwater from the export pipelines.

3.2 Wildlife Act 1953

A wildlife permit will be required to manage lizards if they are identified prior to vegetation removal or ground disturbance works.

3.3 Heritage New Zealand Pouhere Taonga Act 2014

Archaeological authorities will be sought due to the potential for currently undiscovered archaeological features to be disturbed by mining activities (excluding urupa and archaeological areas reserved from mining which will not be disturbed).

4 Benefits of the Projects

The continuation of the mining activity on the Taharoa C Block that will be facilitated by the approvals sought under the FTAA will generate significant regional and national benefits. The Central and Southern Block Mining Project and Northern Block Project will directly contribute billions to the New Zealand economy (through employment, income for landowners, business for regional supplies and the payment of taxes).

The mine provides significant employment opportunities for the community, particularly local Māori. Over 82% of income earned by local Ngāti Mahuta comes from employment at the mine. TIL has a core workforce of 170-80 people but employs upwards of 300 staff and contractors.

TIL relies on locally sourced goods and services including the supply of electricity and services from surrounding areas including Kawhia, Te Kuiti, Otorohanga, Te Awamutu and Hamilton. TIL also relies on specialist sub-contractor support including the maintenance and management of specialised mine machinery and equipment. The support TIL relies on (and will continue to rely on) from

² Excluding the resource consent required for archaeological site disturbance.

surrounding centres for the Northern Block Project and Central and Southern Block Mining Project will inject billions into the local economy over the life of the consents sought for the Project.

The mine also provides essential benefits to the local Taharoa Village which was established around the mine and exists today because of the substantial financial contribution the mine makes every year.

5 Summary of potential adverse effects on the environment

The following high-level summary of effects on the environment is based on technical assessments previously completed in relation to mining of the Central and Southern blocks. These assessments are currently being updated, and additional assessments are being completed for mining of the Northern Block. A full assessment of effects supported by technical assessments will be included in the applications for the Northern and Central/Southern Blocks respectively.

5.1 Effects common to the Northern, Central and Southern Blocks

5.1.1 Effects on terrestrial ecology (including bats, birds, lizards)

Disturbance from mining activities has the potential to have adverse effects on wetland and grassland bird species. The loss of existing grassland due to the mining activity may also result in potential injury or death of various threatened native skink present in low numbers in the grassland. The overall level of effect on terrestrial ecology has been assessed as being **low** with the provision of an over-arching Environmental Management Plan (EMP), including an Avifauna Management Plan, Bat Management Plan and a Lizard Management Plan, and imposition of appropriate conditions such as a requirement for there to be a 30 m planting buffer around all natural water bodies. Subject to the imposition of conditions, the overall level of effects on terrestrial ecology has been assessed as **minor**.

5.1.2 Effects of mining below the water table

When mining activity interacts with groundwater there may be the potential for adverse effects on surface freshwater bodies if there is a hydraulic connection between the groundwater and surface water. This connection will be carefully monitored. Any adverse effects on the primary freshwater bodies on the site (the Mitiwai Stream and the Wainui Stream) can be avoided and mitigated through consent conditions including for example, requirements to maintain a minimum flow within the streams.

5.1.3 Effects of discharge to land

The discharge of tailings and surplus process water to land has the potential to cause adverse effects on landform, groundwater and nearby waterways. The tailings material is re-formed as close as practicable to the original landform. The discharge of surplus process water does not result in contamination of groundwater due to the natural filtering provided by the sandy ground conditions. Overall, the adverse effects of discharges to land have been assessed as **less than minor**.

5.1.4 Land disturbance effects

The mining operation is located in a high-risk erosion area and the mining and stockpiling of iron sand has the potential to result in adverse effects on land stability. Given that the mine has a good operational history with no erosion issues requiring mitigation, a rehabilitation process and

revegetation plan is followed for disturbed areas, and perennial waterbody mining setbacks are imposed, any adverse effects can be considered **negligible**.

5.1.5 Archaeological effects

Taharoa C Block is and has always been Māori land which means that there is elevated potential for accidental discovery of koi iwi and other taonga in the dune environment of the area. Ngāti Mahuta derived tikanga and protocols apply when discoveries of koiwi and taonga occur in the Taharoa dune environment as a result of mining activity, and that tikanga/protocol is reflected in existing and proposed consent conditions. Defined urupā are located within the dune system where accidentally discovered koiwi are interred with appropriate tikanga being observed. A buffer in which no mining occurs is observed around each urupā.

All of these measures and practices will continue and mitigate the potential adverse effects in relation to archaeology to **less than minor** levels.

5.1.6 Cultural effects

In considering cultural effects, it is important to note the cultural benefits the ongoing operation of the mine has for Ngati Mahuta as tangata whenua. These benefits include employment benefits, royalties, and support for the local community. Ngati Mahuta, though the Taharoa C Block Incorporation, own the land on which the mine operates and is paid significant royalties from the mine. The mine also supports the employment and growth of Ngati Mahuta whanau. The local employment opportunity generated by the mine has allowed the local community to retain members of the community who may have otherwise moved away to seek employment elsewhere and lost their connection to the land.

TIL understand the views of the respective Taharoa Marae and Te Runanga in relation to the potential cultural effects of the Central and Southern Block Project. In summary, at a high-level:

The damming of the Wainui Stream has the potential to have adverse effects on the health of Lake Taharoa and its indigenous fishery, an important matter to Ngāti Mahuta. The maintenance of the effectiveness of the fish pass at the dam in the Wainui Stream is important to ensure the presence of indigenous fish species in the stream and lake upstream of the dam continues.

The maintenance and monitoring of baseflow in the Mitiwai Stream is also an important matter from a cultural perspective. TIL has engaged expert consultants to monitor the stream to ensure that TIL understands the potential effects of its mining activity on the Stream, which will be managed through consent conditions. Rehabilitation of the mine site to a sustainable landform and land cover is also an important matter to Ngāti Mahuta. Representatives of Ngāti Mahuta have shared their desire for the land to be returned to its natural state following mining activity (being rolling sand dunes with some pockets of vegetation). In that regard, TIL has developed and is implementing an overall Site Rehabilitation Plan and updated Conceptual Site Closure Plan in place to be implemented in the event that the mine closes in the future.

TIL propose to consult with the respective Taharoa Marae and Te Runanga in the preparation of the various management plans that govern the management of effects at the mine. Such consultation and engagement benefits both parties – TIL will gain the benefit of access to the skills and expertise that reside within the marae and hapu whanau, while marae and hapu whanau will have the opportunity to influence the content of management plans that will play an important part in managing the ongoing effects of the mining activity. TIL will also propose the provision of a website

which includes monthly monitoring records to communicate data to mana whenua and the community.

5.1.7 Air Quality Effects

The mine is located in an isolated location subject to extreme westerly winds. In this environment, there is potential for wind-blown sand from the mine site to generate adverse effects on adjoining and adjacent sites to the mine, including in Taharoa Village. TIL implement a range of avoidance and mitigation techniques to control such emissions including the erection of fencing to trap sand particles, placing ground cover (for example, coconut matting) on exposed areas, using mobile and automated fixed watering systems on internal site roads, enforcing vehicle speed limits, and progressively rehabilitating mined out areas. These measures mean that the mine site can operate in accordance with the relevant permitted activity rule of the Waikato Regional Plan with regards to air quality. TIL proposes to implement a Dust Management Plan to manage the implementation of these dust prevention mechanisms. Although there remains the potential for off-site discharges of dust due to the coastal environment, these discharges are highly unlikely to result in adverse effects to human health. Acoustic Effects

The mining activities have the potential to have adverse noise effects on key sensitive receptors on sites adjoining the Northern Block (1891 Taharoa Road, 1891A Taharoa Road, Te Kōraha Marae and 25 Rotopuhoe Road). However, these receptors are located several hundred metres from where mining will occur on the Northern Block and given this separation distance, it is expected that the works will be able to be managed to comply with the Waitomo District Plan daytime and nighttime noise limits. As a result, any potential adverse effects from noise from mining on the Northern Block on sensitive receivers is expected to be **less than minor**.

Mining on the Central and Southern Blocks has been continuous since the 1970s and benefits from existing use rights with respect to noise levels and associated acoustic effects. Notwithstanding this, noise levels are expected to be compliant with District Plan noise limits. TIL will continue to adopt the best practicable option to ensure that the emission of noise from these blocks does not exceed a reasonable level for any nearby sensitive receptors.

5.2 Effects relating to the Central and Southern Blocks only

5.2.1 Effects of damming Wainui Stream

Authorisation of the dam in the Wainui Stream will result in a similar water regime to what is currently present. Fish passage will be provided for via the monitoring and maintenance of a fish pass which achieves the intended purpose of allowing grey mullet and other targeted species to be able to navigate upstream to Lake Taharoa. The downstream migration of juvenile native fish can be adequately addressed through consent conditions which include the retention of a minimum flow within the fish pass and downstream of the dam, as well as monitoring of fish pass performance. As a result, the effects of the dam on fish passage has been assessed as **negligible**.

5.2.2 Effects on water quantity

Water is extracted from the impounded section of the Wainui Stream for mining and shiploading processes. Separate water take consents are held for the mining and shiploading takes and the consents cannot be exercised at the same time. The mine is currently operating within the historically consented limits for water abstraction and no further water quantity is required for the continued operation of the mine. The Wainui Stream catchment is not over-allocated and there are

no permits held by any other party to take water from the stream. As a result, adverse water quantity effects are avoided.

5.2.3 Effects of water take on marginal wetlands

The proposed water takes have the potential to have adverse effects on marginal wetlands around the edges of Lake Taharoa. Noting that the wetlands have acclimated to the lake levels that have been experienced since the installation of the dam in the Wainui Stream in the early 1970's, the magnitude of these effects has been assessed as **low** given that the water takes will be operated in a similar manner to what has been historically occurred at the mine. Importantly, TIL is proposing to retain existing conditions that require water takes to cease if the lake levels reach a certain minimum point. Conditions will also be proposed that require ongoing monitoring of the lake margin wetlands and management responses to be implemented if the lake level remains low for an extended period and the wetlands show signs of stress (other than that caused by natural seasonal conditions).

5.2.4 Effects on benthic fauna

The proposed ship-loading infrastructure including pipelines on the seabed and the tethering mechanism for the SBM will continue to occupy part of the seabed and impact on a small amount of available subtidal sandflat habitat. Given the small percentage of the available subtidal sandflat habitat this represents, this is assessed as having a low magnitude of effect on benthic ecology. The effects of constructing the pipeline have also been assessed as being **low**.

5.2.5 Effects on fish and seafood species

The discharge from the ship loading process has the potential to have adverse effects on existing habitat for fish and seafood species. Given the relatively infrequent and short-term nature of the discharge and the highly mobile nature of fish species the potential adverse effects are assessed as **negligible**. The presence of green lipped mussels in the area of the discharge indicates that ongoing ship loading discharges do not inhibit mussel colonisation and has a **negligible** effect on seafood resource species.

5.2.6 Effects on marine mammals

A number of marine mammal species can be present in the wider marine area around Port Taharoa such as Māui dolphins, common dolphins, southern right whales and Orca/killer whales. Given the low level of risk posed by the ship loading operation and the fact that it has been occurring in the vicinity since the early 1970's, the overall risk of adverse effects for marine mammals is assessed as **negligible**. Nevertheless, to recognise the sensitivity of the marine mammals that traverse the area, TIL propose conditions that require an underwater noise survey to be undertaken if 35 ship visits occur in a 12 month period, in order to inform best practice underwater noise measures.

5.2.7 Effects on coastal processes

TIL seeks to continue the ability to discharge up to 75,000m³ per day of ship loading water, including freshwater and fine sediment, up to a maximum of 7,500,000m³ per year. As a result of dilution and dispersion of the sediment plume provided by oceanic conditions, the effect of this discharge on coastal processes has been assessed as being **less than minor**.

5.2.8 Effects of discharges in the Coastal Marine Area (CMA)

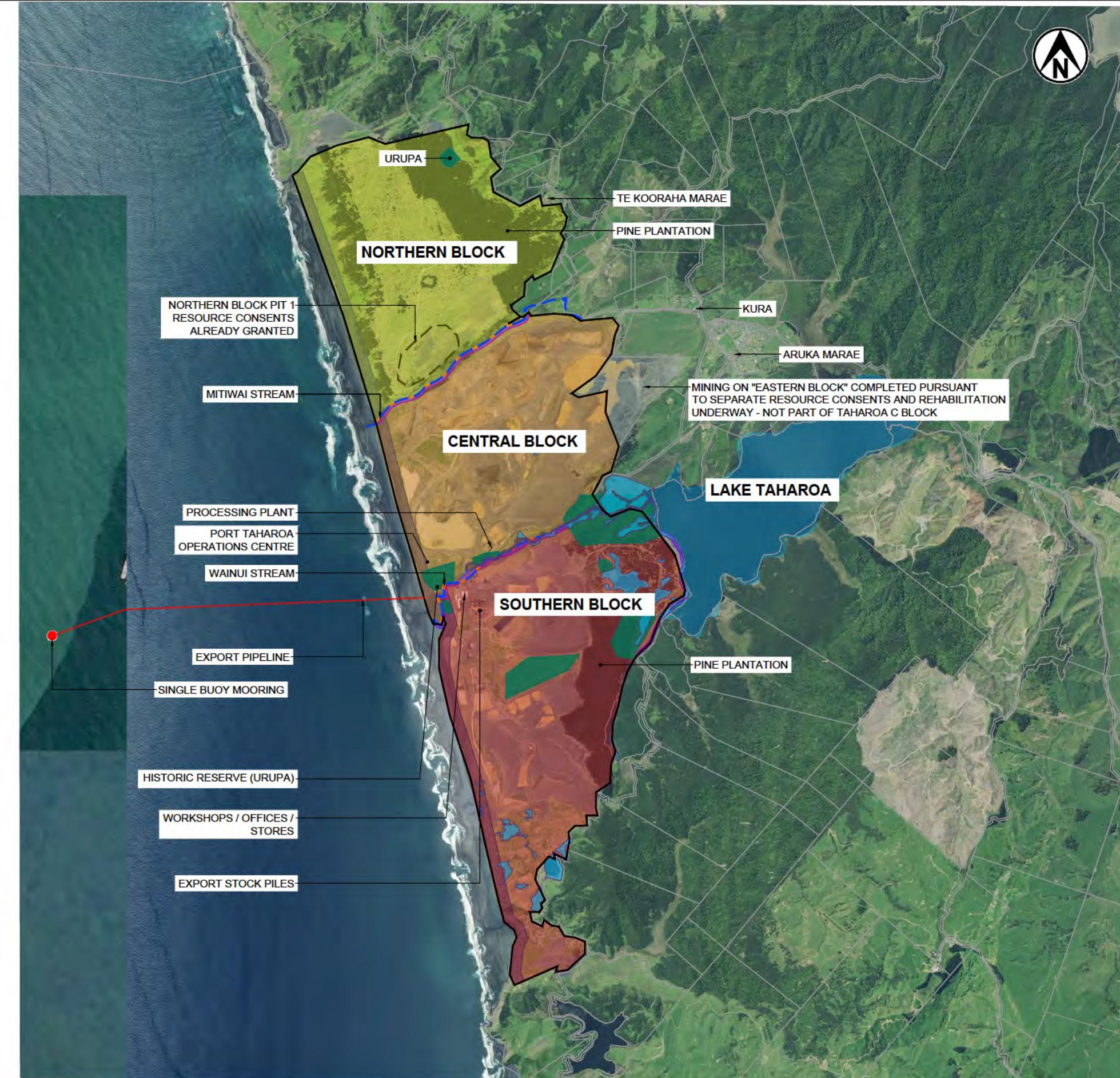
The potential adverse effects of the sediment discharge from the ship-loading events have been addressed above. The discharge includes some trace levels of naturally occurring contaminants in the ironsand that is pumped in slurry form into the ship. Because of the extremely low levels of the naturally occurring contaminants, and the dilution provided by the sea water, the discharge will not result in any measurable toxicity effect on benthic fauna.

TIL is seeking consent to continue to discharge excess process water and stormwater to the CMA at a rate of 32,000m³/day. This discharge occurs infrequently and when there is no suitable alternative to provide for the discharge on land - primarily at times of prolonged heavy rainfall. The potential ecological effects from the process water/stormwater discharge are likely to be even less than those of the ship loading discharge which were assessed to be less than minor. Correspondingly, no further actions to avoid, remedy or mitigate potential effects from the process wastewater and stormwater discharges are required apart from monitoring of the discharge quality and composition.

5.2.9 Effects on navigation safety

The continued ship movements to and from the Port of Taharoa and the occupation of the CMA by ship loading infrastructure have the potential to have adverse effects on navigational safety of other users of the CMA. However, the use of this area for recreational watercraft and commercial vessels is infrequent and the movement of ironsand export ships has been established in the area since the early 1970's. No more than one ship can access the mooring buoy at one time. Furthermore, the Port of Taharoa is operated in compliance with the New Zealand Port and Harbour Marine Safety Code, the Harbourmaster previously had no objection to the continued activity and several improvements have been implemented since the granting of the now expired resource consents in 2002. For these reasons, potential adverse effects on navigation safety have been assessed as **less than minor**.

LEGEND	
	STREAM
	PROPERTY BOUNDARIES
	MINING LICENCE AREA (TAHAROA C BLOCK)
	NORTHERN BLOCK
	CENTRAL BLOCK
	SOUTHERN BLOCK
	30m PERENNIAL WATER BODY / STREAM SETBACK
	100m MHWS SETBACK SUBJECT TO SURVEY
	ARCHEOLOGICAL AREAS RESERVED FROM MINING
	WETLAND



Tim Fletcher

Subject: Meeting - Wetini's
Location: Waitomo

Start: Wed 16/07/2025 11:00 am
End: Wed 16/07/2025 12:00 pm

Recurrence: (none)

Meeting Status: Accepted

Organizer: Turley, James JT

Microsoft Teams [Need help?](#)

[Join the meeting now](#)

Meeting ID: [REDACTED]

Passcode: [REDACTED]

For organisers: [Meeting options](#)

Holly-Marie Rearic

From: Coffey, Wayne WC [REDACTED] >
Sent: Monday, 23 June 2025 10:26 am
To: Holly-Marie Rearic
Subject: Fwd: Invitation to provide written feedback – Taharoa Ironsands Limited Fast-track Applications
Attachments: Consultation letter to Hilda Kana and Claude Kana Jr dated 21 May 2025.pdf

Sent from my iPad

Begin forwarded message:

From: "Coffey, Wayne WC" [REDACTED] >
Date: 26 May 2025 at 12:26:07 PM NZST
To: [REDACTED]
Subject: Invitation to provide written feedback – Taharoa Ironsands Limited Fast-track Applications

Good afternoon

Please see the **attached** letter in relation to applications that TIL is preparing for the Central and Southern Block Project and Northern Block Project under the Fast-track Approvals Act 2024.

We have previously engaged with you in respect of our RMA application for the Central and Southern Blocks. We want to provide you with the opportunity to provide further feedback on TIL's Fast-track applications.

Regards

Wayne



Taharoa Ironsands Ltd

21 May 2025

BY EMAIL: [REDACTED]

Kana Whānau
[REDACTED]
[REDACTED]

Dear Hilda and Claude

Taharoa Ironsands Limited – Fast-track Approvals Act 2024 applications

1. As you know, Taharoa Ironsands Limited (**TIL**) owns and operates the Taharoa Ironsand Mine which has been in operation since 1973.
2. The Mine is divided into blocks known as the Northern, Central and Southern Block which are all located on Taharoa C Block, as well as the Eastern Blocks and the Te Mania Extension which are located on adjoining land.
3. TIL needs to replace its resource consents relating to the Central and Southern Blocks to continue operating the existing Mine and to enable expansion of the Mine in the future. TIL sought to do so by making an application in 2020 under the standard resource consenting process under the Resource Management Act 1991 (**RMA**). The consenting process under the RMA was lengthy and TIL was not satisfied with the decision, which led it to appeal the decision to the Environment Court on 12 December 2024.
4. Since the appeal was filed, the Fast-track Approvals Act 2024 (**FTAA**) has been enacted. The FTAA establishes a fast-track environmental approvals regime for projects of national and regional significance in New Zealand.
5. The reconsenting of the Central and Southern Blocks of the Mine has been recognised by the Government as having regional and national significance and has been directly referred to utilise the Fast-Track approval process. The FTAA therefore provides an alternative, and suitable, consenting pathway for TIL to apply for the resource consenting process for the Central and Southern Blocks. New mining of the Northern Block has also been directly referred by the Government to utilise the Fast-track process on account of its regional and national significance.
6. We are now preparing our substantive applications for both projects which will be considered under the FTAA. We are intending to file the applications with the Environmental Protection Agency in June/July 2025. Enviser is managing the preparation of the applications on behalf of TIL with input from a range of technical consultants, including Grant Eccles (planner) of Tonkin & Taylor Limited. Tonkin & Taylor has provided a high-level summary of what will be sought in each application in **Appendix A**.
7. We have previously engaged with you in respect of our application under the RMA for the Central and Southern Blocks, and you participated in the hearing of that application. TIL understands your view in respect of the Mine and the consenting of the Central and Southern Blocks from that process. However, we are writing to provide you with an opportunity to provide further written feedback on the FTAA applications, while they are being prepared.

8. If you would like to provide written feedback, please let us know using the following email address: [REDACTED] We would appreciate that any written feedback is provided by 10 June 2025.

Yours faithfully



Wayne Coffey
Managing Director and CEO of Taharoa Ironsands Limited

Appendix A

Taharoa Ironsands Mine – Project summary for pre-application consultation

- **Northern Block Mining Project**
- **Central and Southern Block Mining Project**

1 Overview

Taharoa Ironsands Limited (TIL) operate an iron sand mine at Taharoa, on the West Coast of the North Island, approximately 8 km south of Kawhia Harbour. The Taharoa Mine has been in operation since 1973 (owned by New Zealand Steel until 2017). The mine site covers an area of approximately 1,300 hectares, primarily on Māori land legally described as the Taharoa C Block and the part of the coastal marine area (CMA) legally defined as Port Taharoa (**mine**).

For the purposes of mining activity, Taharoa C Block is divided into blocks. As shown on the attached plan:

- (a) the area of the site to the north of the Mitiwai Stream is known as the Northern Block.
- (b) the area of the site between the Mitiwai Stream and the Wainui Stream is known as the Central Block; and
- (c) the area of the site to the south of the Wainui Stream is known as the Southern Block.

The Central and Southern Blocks are currently operated under a suite of resource consents granted in 2006.¹ Mining activity has not historically occurred in the Northern Block.

TIL is now preparing applications for the necessary resource consents, wildlife permits and archaeological authorities under the Fast-track Approvals Act 2024 (FTAA) to authorise:

- the extraction of sand (and associated activities) on the Northern Block (known as the Northern Block Mining Project); and
- the continuation of sand extraction (and associated activities which support the entire mine, including its export operation) on the Central and Southern Blocks and in the CMA (known as the Central and Southern Block Mining Project).

The following describes the proposed mining and associated works which are subject to the applications, details the resource consents and approvals sought and provides a high-level summary of the potential effects on the environment of each project at this stage. As the applications are currently being prepared, this information is based on the work completed as of 01 May 2025, and is subject to change.

¹ TIL also hold separate resource consents for mining of (i) the “Eastern Block” granted in 2018 (mining now completed and rehabilitation underway), and (ii) the “Te Mania Extension” adjoining the Eastern Block granted in 2022 (mining yet to commence), and (iii) a small area in the Northern Block known as “Pit 1” granted in late 2024 (mining currently in progress). Mining at these locations relies on the water take resource consents and the coastal permits granted for the Central and Southern Blocks.

2 Description of proposed works

TIL propose to mine ironsand throughout the Northern, Central and Southern Blocks excluding areas where mining restrictions will apply. The areas where mining activity will not take place are within 100 m of Mean High Water Springs, 30 m of perennial water bodies (Mitiwai Stream, Wainui Stream and Lake Taharoa), and within already identified urupa and archaeological re-interment areas on the mine. Other mining exclusion areas may be identified as part of the completion of technical assessments that are currently underway. Any additional mining exclusion areas that are identified by the technical assessments will be included in the substantive FTAA applications.

Whilst the process to extract, process and export the ironsand can and does vary depending on the nature of the deposit being mined at the time, it follows the same broad steps. These activities, which are sought to be authorised as part of the Central and Southern Block Project, include:

1. **Vegetation, topsoil and overburden removal, including harvesting of trees with commercial value (pines).** Useful native species are removed prior to stripping of topsoil for use in the eco-sourced nursery on site. Topsoil is stockpiled on-site for use in future rehabilitation activities.
2. **Extraction and processing of Ironsand.** Raw Ironsand is extracted using various methods and equipment depending on ground conditions. In upper layers, standard earthmoving machinery such as excavators, bulldozers, and trucks are used to collect the ironsand and deposit it into a Dry Mining Unit (DMU). The DMU mixes the ironsand with water to form a slurry, which is then pumped to a treatment plant for titanomagnetite extraction.
3. During this process, groundwater and surface water may enter the active excavation area. To maintain dry working conditions, this water may be pumped out as required. However, as mining progresses to deeper layers, maintaining a dry pit may become impractical. In such cases, a cutter-suction dredge is used in a water-filled pond. The dredge floats on the water and uses a submerged dredge head to cut, fluidise, and pump the Ironsand slurry through a pipeline to the treatment plant. The dredge is capable of operating at depths of 8 to 15 meters below the pond surface. In some instances, a long-reach excavator may also be used to extract material from within the pond.
4. **Processing.** The extracted ironsand is transported to a centralised processing plant where it is concentrated and processed. The ironsand is refined using screening and gravity separation. The ironsand is mixed into a slurry and pumped through a seabed pipeline to a bulk carrier ship moored at the Port of Taharoa. The export pipelines run from the processing and storage facility located on land to a Single Buoy Mooring (SBM), located approximately 3.5 km offshore.
5. **Ship loading and dewatering.** Bulk carrier ships moor at the SBM to receive the ironsand in slurry form from the export pipelines. Each ship contains dewatering equipment and the resulting freshwater, containing residual fine suspended material (inert, inorganic geological material) that is removed from the ironsand slurry, is discharged from the ship to the sea. The discharge forms a buoyant plume that floats on the seawater surface before dispersal and dilution. Ship loading operations are currently undertaken approximately 20 times per year and will increase in frequency in future as production increases up to a projected maximum of 35 times per year. Each ship loading activity takes approximately 90 hours (of pumping time) however weather conditions have an influence on loading timeframes.

6. **Tailings disposal and rehabilitation of mined areas.** The tailings (ferrous and non-ferrous sand, silts and clays) which are separated from the exportable product are pumped as a slurry to tailings disposal areas. The discharged slurry dewateres by gravity, with the drainage water collected and directed into a settlement pond or ponds. Once the tailings have dewatered, mechanical plant (excavators and dozers) redistribute the material to form the grade and levels required by the rehabilitation plan for that area. Following this the land may be stabilised, top soiled and replanted.

To operate the mine, the process requires the abstraction of water from the Wainui Stream via a constructed dam incorporating a fish pass, and the discharge of stormwater to the Wainui Stream and the discharge of process water to settling ponds. Excess stormwater and process water is discharged to the CMA via the ship loading pipelines.

The activities sought to be authorised as part of the Northern Block Mining Project include (but are not limited to):

- (a) vegetation, topsoil and overburden removal, and excavation and processing of iron sand above and below the water table (as above);
- (b) the transportation of that product via temporary pipelines to the established processing plant on the Central and Southern Block;
- (c) processing (as above);
- (d) discharge of process water to land; and
- (e) tailing disposal and rehabilitation of mined areas (as above).

The Northern Block Mining Project will rely on / be supported by the processing infrastructure located on the Central and Southern Blocks. It will also rely on / be supported by the consents being sought for the Central and Southern Block to take and use water from the Wainui Stream, discharge of stormwater to the Wainui Stream and the CMA, discharge of process water to the CMA and transport of processed product from the processing facility through the ship-loading pipelines to the CMA. No changes are being proposed to the existing water take limits and discharge limits to facilitate mining of the Northern Block.

3 Approvals sought

3.1 Resource Management Act 1991

A summary of the resource consents that are required for the Northern, Central and Southern Blocks is set out below.

3.1.1 Resource consents required for the Northern Block

National Environmental Standard for Freshwater 2020 – consents to clear vegetation and undertake earthworks within and within 10m of a natural inland wetland. Consents are also required to take, use, dam, or divert water within and within 100 m of a natural inland wetland and to discharge water within and within 100 m of a natural inland wetland.

National Environmental Standard for Commercial Forestry 2017 – consent to harvest pine trees within Class 8e land.

Operative Waikato Regional Plan – consents for soil disturbance and vegetation clearance activities, diversion and taking of groundwater and surface of water associated with mining above and below the water table, discharge of a contaminant to land or water (process water and placement of tailings) and for overburden disposal to land.

Additionally, resource consent is required under the Operative Waitomo District Plan for the potential disturbance of archaeological sites recorded in the Plan - this consent applies to the Northern Block only given that mining has occurred since the early 1970's on the Central and Southern Blocks.

3.1.2 Resource consents required for the Central and Southern Blocks

The resource consents set out above are also required for the Central and Southern Blocks.² In addition, the following resource consents are required for the Central and Southern Blocks Project:

Operative Waikato Regional Plan – consents for the damming, diversion and taking of surface water and groundwater, for stream bed disturbance, and for the discharge of stormwater to surface water.

Operative and Proposed Waikato Regional Coastal Plans – consents for the use and occupation of the Coastal Marine Area by the export pipelines and the SBM, for discharges to and depositions in the CMA from shiploading activities, and for the discharge of stormwater from the export pipelines.

3.2 Wildlife Act 1953

A wildlife permit will be required to manage lizards if they are identified prior to vegetation removal or ground disturbance works.

3.3 Heritage New Zealand Pouhere Taonga Act 2014

Archaeological authorities will be sought due to the potential for currently undiscovered archaeological features to be disturbed by mining activities (excluding urupa and archaeological areas reserved from mining which will not be disturbed).

4 Benefits of the Projects

The continuation of the mining activity on the Taharoa C Block that will be facilitated by the approvals sought under the FTAA will generate significant regional and national benefits. The Central and Southern Block Mining Project and Northern Block Project will directly contribute billions to the New Zealand economy (through employment, income for landowners, business for regional supplies and the payment of taxes).

The mine provides significant employment opportunities for the community, particularly local Māori. Over 82% of income earned by local Ngāti Mahuta comes from employment at the mine. TIL has a core workforce of 170-80 people but employs upwards of 300 staff and contractors.

TIL relies on locally sourced goods and services including the supply of electricity and services from surrounding areas including Kawhia, Te Kuiti, Otorohanga, Te Awamutu and Hamilton. TIL also relies on specialist sub-contractor support including the maintenance and management of specialised mine machinery and equipment. The support TIL relies on (and will continue to rely on) from

² Excluding the resource consent required for archaeological site disturbance.

surrounding centres for the Northern Block Project and Central and Southern Block Mining Project will inject billions into the local economy over the life of the consents sought for the Project.

The mine also provides essential benefits to the local Taharoa Village which was established around the mine and exists today because of the substantial financial contribution the mine makes every year.

5 Summary of potential adverse effects on the environment

The following high-level summary of effects on the environment is based on technical assessments previously completed in relation to mining of the Central and Southern blocks. These assessments are currently being updated, and additional assessments are being completed for mining of the Northern Block. A full assessment of effects supported by technical assessments will be included in the applications for the Northern and Central/Southern Blocks respectively.

5.1 Effects common to the Northern, Central and Southern Blocks

5.1.1 Effects on terrestrial ecology (including bats, birds, lizards)

Disturbance from mining activities has the potential to have adverse effects on wetland and grassland bird species. The loss of existing grassland due to the mining activity may also result in potential injury or death of various threatened native skink present in low numbers in the grassland. The overall level of effect on terrestrial ecology has been assessed as being **low** with the provision of an over-arching Environmental Management Plan (EMP), including an Avifauna Management Plan, Bat Management Plan and a Lizard Management Plan, and imposition of appropriate conditions such as a requirement for there to be a 30 m planting buffer around all natural water bodies. Subject to the imposition of conditions, the overall level of effects on terrestrial ecology has been assessed as **minor**.

5.1.2 Effects of mining below the water table

When mining activity interacts with groundwater there may be the potential for adverse effects on surface freshwater bodies if there is a hydraulic connection between the groundwater and surface water. This connection will be carefully monitored. Any adverse effects on the primary freshwater bodies on the site (the Mitiwai Stream and the Wainui Stream) can be avoided and mitigated through consent conditions including for example, requirements to maintain a minimum flow within the streams.

5.1.3 Effects of discharge to land

The discharge of tailings and surplus process water to land has the potential to cause adverse effects on landform, groundwater and nearby waterways. The tailings material is re-formed as close as practicable to the original landform. The discharge of surplus process water does not result in contamination of groundwater due to the natural filtering provided by the sandy ground conditions. Overall, the adverse effects of discharges to land have been assessed as **less than minor**.

5.1.4 Land disturbance effects

The mining operation is located in a high-risk erosion area and the mining and stockpiling of iron sand has the potential to result in adverse effects on land stability. Given that the mine has a good operational history with no erosion issues requiring mitigation, a rehabilitation process and

revegetation plan is followed for disturbed areas, and perennial waterbody mining setbacks are imposed, any adverse effects can be considered **negligible**.

5.1.5 Archaeological effects

Taharoa C Block is and has always been Māori land which means that there is elevated potential for accidental discovery of koi iwi and other taonga in the dune environment of the area. Ngāti Mahuta derived tikanga and protocols apply when discoveries of koiwi and taonga occur in the Taharoa dune environment as a result of mining activity, and that tikanga/protocol is reflected in existing and proposed consent conditions. Defined urupā are located within the dune system where accidentally discovered koiwi are interred with appropriate tikanga being observed. A buffer in which no mining occurs is observed around each urupā.

All of these measures and practices will continue and mitigate the potential adverse effects in relation to archaeology to **less than minor** levels.

5.1.6 Cultural effects

In considering cultural effects, it is important to note the cultural benefits the ongoing operation of the mine has for Ngati Mahuta as tangata whenua. These benefits include employment benefits, royalties, and support for the local community. Ngati Mahuta, though the Taharoa C Block Incorporation, own the land on which the mine operates and is paid significant royalties from the mine. The mine also supports the employment and growth of Ngati Mahuta whanau. The local employment opportunity generated by the mine has allowed the local community to retain members of the community who may have otherwise moved away to seek employment elsewhere and lost their connection to the land.

TIL understand the views of the respective Taharoa Marae and Te Runanga in relation to the potential cultural effects of the Central and Southern Block Project. In summary, at a high-level:

The damming of the Wainui Stream has the potential to have adverse effects on the health of Lake Taharoa and its indigenous fishery, an important matter to Ngāti Mahuta. The maintenance of the effectiveness of the fish pass at the dam in the Wainui Stream is important to ensure the presence of indigenous fish species in the stream and lake upstream of the dam continues.

The maintenance and monitoring of baseflow in the Mitiwai Stream is also an important matter from a cultural perspective. TIL has engaged expert consultants to monitor the stream to ensure that TIL understands the potential effects of its mining activity on the Stream, which will be managed through consent conditions. Rehabilitation of the mine site to a sustainable landform and land cover is also an important matter to Ngāti Mahuta. Representatives of Ngāti Mahuta have shared their desire for the land to be returned to its natural state following mining activity (being rolling sand dunes with some pockets of vegetation). In that regard, TIL has developed and is implementing an overall Site Rehabilitation Plan and updated Conceptual Site Closure Plan in place to be implemented in the event that the mine closes in the future.

TIL propose to consult with the respective Taharoa Marae and Te Runanga in the preparation of the various management plans that govern the management of effects at the mine. Such consultation and engagement benefits both parties – TIL will gain the benefit of access to the skills and expertise that reside within the marae and hapu whanau, while marae and hapu whanau will have the opportunity to influence the content of management plans that will play an important part in managing the ongoing effects of the mining activity. TIL will also propose the provision of a website

which includes monthly monitoring records to communicate data to mana whenua and the community.

5.1.7 Air Quality Effects

The mine is located in an isolated location subject to extreme westerly winds. In this environment, there is potential for wind-blown sand from the mine site to generate adverse effects on adjoining and adjacent sites to the mine, including in Taharoa Village. TIL implement a range of avoidance and mitigation techniques to control such emissions including the erection of fencing to trap sand particles, placing ground cover (for example, coconut matting) on exposed areas, using mobile and automated fixed watering systems on internal site roads, enforcing vehicle speed limits, and progressively rehabilitating mined out areas. These measures mean that the mine site can operate in accordance with the relevant permitted activity rule of the Waikato Regional Plan with regards to air quality. TIL proposes to implement a Dust Management Plan to manage the implementation of these dust prevention mechanisms. Although there remains the potential for off-site discharges of dust due to the coastal environment, these discharges are highly unlikely to result in adverse effects to human health. Acoustic Effects

The mining activities have the potential to have adverse noise effects on key sensitive receptors on sites adjoining the Northern Block (1891 Taharoa Road, 1891A Taharoa Road, Te Kōraha Marae and 25 Rotopuhoe Road). However, these receptors are located several hundred metres from where mining will occur on the Northern Block and given this separation distance, it is expected that the works will be able to be managed to comply with the Waitomo District Plan daytime and nighttime noise limits. As a result, any potential adverse effects from noise from mining on the Northern Block on sensitive receivers is expected to be **less than minor**.

Mining on the Central and Southern Blocks has been continuous since the 1970s and benefits from existing use rights with respect to noise levels and associated acoustic effects. Notwithstanding this, noise levels are expected to be compliant with District Plan noise limits. TIL will continue to adopt the best practicable option to ensure that the emission of noise from these blocks does not exceed a reasonable level for any nearby sensitive receptors.

5.2 Effects relating to the Central and Southern Blocks only

5.2.1 Effects of damming Wainui Stream

Authorisation of the dam in the Wainui Stream will result in a similar water regime to what is currently present. Fish passage will be provided for via the monitoring and maintenance of a fish pass which achieves the intended purpose of allowing grey mullet and other targeted species to be able to navigate upstream to Lake Taharoa. The downstream migration of juvenile native fish can be adequately addressed through consent conditions which include the retention of a minimum flow within the fish pass and downstream of the dam, as well as monitoring of fish pass performance. As a result, the effects of the dam on fish passage has been assessed as **negligible**.

5.2.2 Effects on water quantity

Water is extracted from the impounded section of the Wainui Stream for mining and shiploading processes. Separate water take consents are held for the mining and shiploading takes and the consents cannot be exercised at the same time. The mine is currently operating within the historically consented limits for water abstraction and no further water quantity is required for the continued operation of the mine. The Wainui Stream catchment is not over-allocated and there are

no permits held by any other party to take water from the stream. As a result, adverse water quantity effects are avoided.

5.2.3 Effects of water take on marginal wetlands

The proposed water takes have the potential to have adverse effects on marginal wetlands around the edges of Lake Taharoa. Noting that the wetlands have acclimated to the lake levels that have been experienced since the installation of the dam in the Wainui Stream in the early 1970's, the magnitude of these effects has been assessed as **low** given that the water takes will be operated in a similar manner to what has been historically occurred at the mine. Importantly, TIL is proposing to retain existing conditions that require water takes to cease if the lake levels reach a certain minimum point. Conditions will also be proposed that require ongoing monitoring of the lake margin wetlands and management responses to be implemented if the lake level remains low for an extended period and the wetlands show signs of stress (other than that caused by natural seasonal conditions).

5.2.4 Effects on benthic fauna

The proposed ship-loading infrastructure including pipelines on the seabed and the tethering mechanism for the SBM will continue to occupy part of the seabed and impact on a small amount of available subtidal sandflat habitat. Given the small percentage of the available subtidal sandflat habitat this represents, this is assessed as having a low magnitude of effect on benthic ecology. The effects of constructing the pipeline have also been assessed as being **low**.

5.2.5 Effects on fish and seafood species

The discharge from the ship loading process has the potential to have adverse effects on existing habitat for fish and seafood species. Given the relatively infrequent and short-term nature of the discharge and the highly mobile nature of fish species the potential adverse effects are assessed as **negligible**. The presence of green lipped mussels in the area of the discharge indicates that ongoing ship loading discharges do not inhibit mussel colonisation and has a **negligible** effect on seafood resource species.

5.2.6 Effects on marine mammals

A number of marine mammal species can be present in the wider marine area around Port Taharoa such as Māui dolphins, common dolphins, southern right whales and Orca/killer whales. Given the low level of risk posed by the ship loading operation and the fact that it has been occurring in the vicinity since the early 1970's, the overall risk of adverse effects for marine mammals is assessed as **negligible**. Nevertheless, to recognise the sensitivity of the marine mammals that traverse the area, TIL propose conditions that require an underwater noise survey to be undertaken if 35 ship visits occur in a 12 month period, in order to inform best practice underwater noise measures.

5.2.7 Effects on coastal processes

TIL seeks to continue the ability to discharge up to 75,000m³ per day of ship loading water, including freshwater and fine sediment, up to a maximum of 7,500,000m³ per year. As a result of dilution and dispersion of the sediment plume provided by oceanic conditions, the effect of this discharge on coastal processes has been assessed as being **less than minor**.

5.2.8 Effects of discharges in the Coastal Marine Area (CMA)

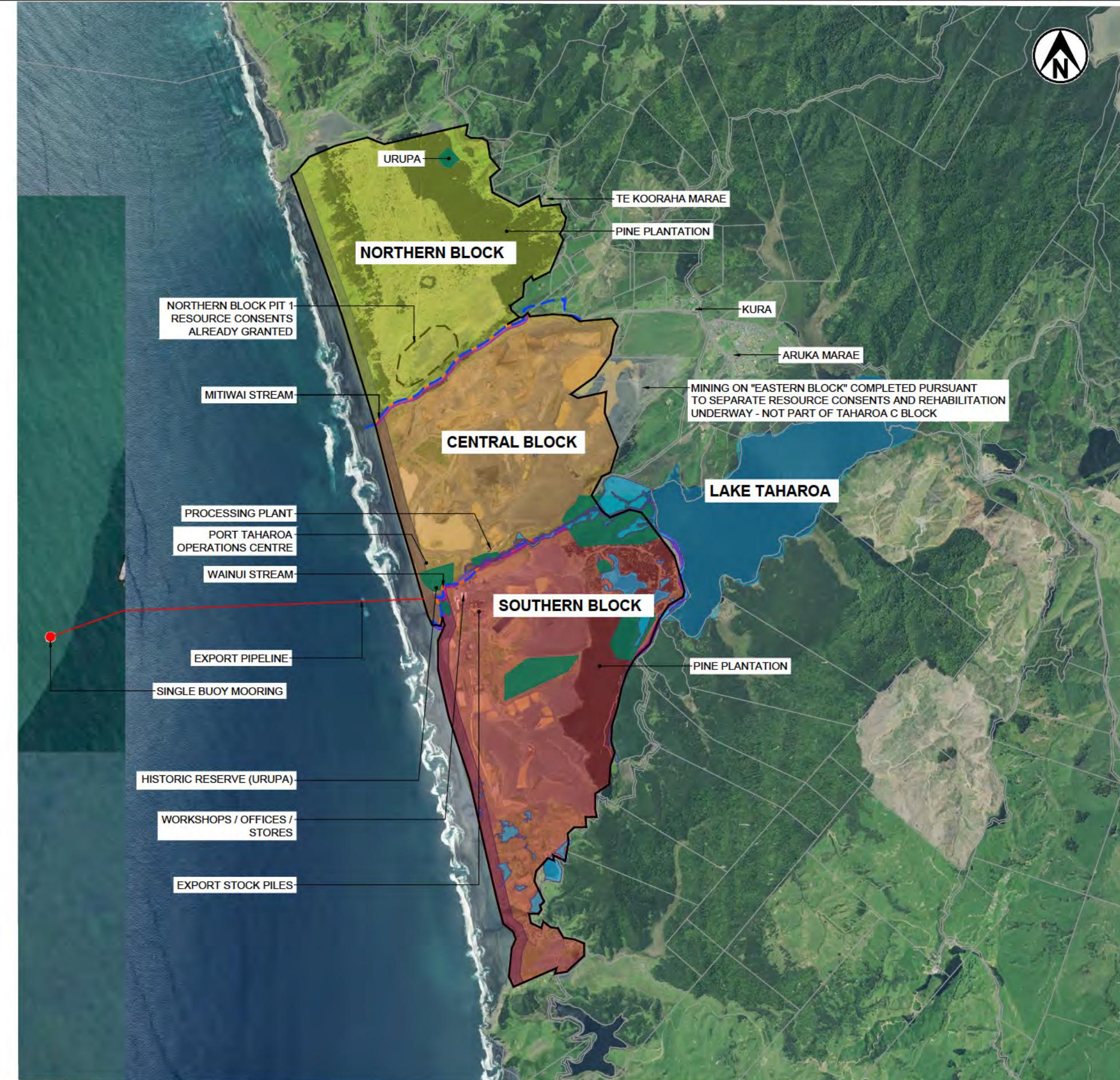
The potential adverse effects of the sediment discharge from the ship-loading events have been addressed above. The discharge includes some trace levels of naturally occurring contaminants in the ironsand that is pumped in slurry form into the ship. Because of the extremely low levels of the naturally occurring contaminants, and the dilution provided by the sea water, the discharge will not result in any measurable toxicity effect on benthic fauna.

TIL is seeking consent to continue to discharge excess process water and stormwater to the CMA at a rate of 32,000m³/day. This discharge occurs infrequently and when there is no suitable alternative to provide for the discharge on land - primarily at times of prolonged heavy rainfall. The potential ecological effects from the process water/stormwater discharge are likely to be even less than those of the ship loading discharge which were assessed to be less than minor. Correspondingly, no further actions to avoid, remedy or mitigate potential effects from the process wastewater and stormwater discharges are required apart from monitoring of the discharge quality and composition.

5.2.9 Effects on navigation safety

The continued ship movements to and from the Port of Taharoa and the occupation of the CMA by ship loading infrastructure have the potential to have adverse effects on navigational safety of other users of the CMA. However, the use of this area for recreational watercraft and commercial vessels is infrequent and the movement of ironsand export ships has been established in the area since the early 1970's. No more than one ship can access the mooring buoy at one time. Furthermore, the Port of Taharoa is operated in compliance with the New Zealand Port and Harbour Marine Safety Code, the Harbourmaster previously had no objection to the continued activity and several improvements have been implemented since the granting of the now expired resource consents in 2002. For these reasons, potential adverse effects on navigation safety have been assessed as **less than minor**.

LEGEND	
	STREAM
	PROPERTY BOUNDARIES
	MINING LICENCE AREA (TAHAROA C BLOCK)
	NORTHERN BLOCK
	CENTRAL BLOCK
	SOUTHERN BLOCK
	30m PERENNIAL WATER BODY / STREAM SETBACK
	100m MHWS SETBACK SUBJECT TO SURVEY
	ARCHEOLOGICAL AREAS RESERVED FROM MINING
	WETLAND



Holly-Marie Rearic

From: Coffey, Wayne WC [REDACTED]
Sent: Monday, 23 June 2025 10:26 am
To: Holly-Marie Rearic
Subject: Fwd: Invitation to provide written feedback – Taharoa Ironsands Limited Fast-track Applications
Attachments: Consultation letter to Te Huia Pihopa Trust dated 21 May 2025.pdf

Sent from my iPad

Begin forwarded message:

From: "Coffey, Wayne WC" [REDACTED]
Date: 26 May 2025 at 12:27:15 PM NZST
To: [REDACTED]
Subject: Invitation to provide written feedback – Taharoa Ironsands Limited Fast-track Applications

Good afternoon Geneva and Stephen

Please see the **attached** letter in relation to applications that TIL is preparing for the Central and Southern Block Project and Northern Block Project under the Fast-track Approvals Act 2024.

We have previously engaged with you in respect of our RMA application for the Central and Southern Blocks. We want to provide you with the opportunity to provide further feedback on TIL's Fast-track applications.

Regards

Wayne



Taharoa Ironsands Ltd

21 May 2025

BY EMAIL: [REDACTED]

Te Huia Pihopa Trust
C/- Geneva Adams
[REDACTED]
[REDACTED]

Dear Geneva

Taharoa Ironsands Limited – Fast-track Approvals Act 2024 applications

1. As you know, Taharoa Ironsands Limited (**TIL**) owns and operates the Taharoa Ironsand Mine which has been in operation since 1973.
2. The Mine is divided into blocks known as the Northern, Central and Southern Block which are all located on Taharoa C Block, as well as the Eastern Blocks and the Te Mania Extension which are located on adjoining land.
3. TIL needs to replace its resource consents relating to the Central and Southern Blocks to continue operating the existing Mine and to enable expansion of the Mine in the future. TIL sought to do so by making an application in 2020 under the standard resource consenting process under the Resource Management Act 1991 (**RMA**). The consenting process under the RMA was lengthy and TIL was not satisfied with the decision, which led it to appeal the decision to the Environment Court on 12 December 2024.
4. Since the appeal was filed, the Fast-track Approvals Act 2024 (**FTAA**) has been enacted. The FTAA establishes a fast-track environmental approvals regime for projects of national and regional significance in New Zealand.
5. The reconsenting of the Central and Southern Blocks of the Mine has been recognised by the Government as having regional and national significance and has been directly referred to utilise the Fast-Track approval process. The FTAA therefore provides an alternative, and suitable, consenting pathway for TIL to apply for the resource consenting process for the Central and Southern Blocks. New mining of the Northern Block has also been directly referred by the Government to utilise the Fast-track process on account of its regional and national significance.
6. We are now preparing our substantive applications for both projects which will be considered under the FTAA. We are intending to file the applications with the Environmental Protection Agency in June/July 2025. Enviser is managing the preparation of the applications on behalf of TIL with input from a range of technical consultants, including Grant Eccles (planner) of Tonkin & Taylor Limited. Tonkin & Taylor has provided a high-level summary of what will be sought in each application in **Appendix A**.
7. We have previously engaged with you in respect of our application under the RMA for the Central and Southern Blocks, and you participated in the hearing of that application. TIL understands your view in respect of the Mine and the consenting of the Central and Southern Blocks from that process. However, we are writing to provide you with an opportunity to provide further written feedback on the FTAA applications, while they are being prepared.

8. If you would like to provide written feedback, please let us know using the following email [REDACTED] We would appreciate that any written feedback is provided by 10 June 2025.

Yours faithfully

Wayne Coffey
Managing Director and CEO of Taharoa Ironsands Limited

Appendix A

Taharoa Ironsands Mine – Project summary for pre-application consultation

- **Northern Block Mining Project**
- **Central and Southern Block Mining Project**

1 Overview

Taharoa Ironsands Limited (TIL) operate an iron sand mine at Taharoa, on the West Coast of the North Island, approximately 8 km south of Kawhia Harbour. The Taharoa Mine has been in operation since 1973 (owned by New Zealand Steel until 2017). The mine site covers an area of approximately 1,300 hectares, primarily on Māori land legally described as the Taharoa C Block and the part of the coastal marine area (CMA) legally defined as Port Taharoa (**mine**).

For the purposes of mining activity, Taharoa C Block is divided into blocks. As shown on the attached plan:

- (a) the area of the site to the north of the Mitiwai Stream is known as the Northern Block.
- (b) the area of the site between the Mitiwai Stream and the Wainui Stream is known as the Central Block; and
- (c) the area of the site to the south of the Wainui Stream is known as the Southern Block.

The Central and Southern Blocks are currently operated under a suite of resource consents granted in 2006.¹ Mining activity has not historically occurred in the Northern Block.

TIL is now preparing applications for the necessary resource consents, wildlife permits and archaeological authorities under the Fast-track Approvals Act 2024 (FTAA) to authorise:

- the extraction of sand (and associated activities) on the Northern Block (known as the Northern Block Mining Project); and
- the continuation of sand extraction (and associated activities which support the entire mine, including its export operation) on the Central and Southern Blocks and in the CMA (known as the Central and Southern Block Mining Project).

The following describes the proposed mining and associated works which are subject to the applications, details the resource consents and approvals sought and provides a high-level summary of the potential effects on the environment of each project at this stage. As the applications are currently being prepared, this information is based on the work completed as of 01 May 2025, and is subject to change.

¹ TIL also hold separate resource consents for mining of (i) the “Eastern Block” granted in 2018 (mining now completed and rehabilitation underway), and (ii) the “Te Mania Extension” adjoining the Eastern Block granted in 2022 (mining yet to commence), and (iii) a small area in the Northern Block known as “Pit 1” granted in late 2024 (mining currently in progress). Mining at these locations relies on the water take resource consents and the coastal permits granted for the Central and Southern Blocks.

2 Description of proposed works

TIL propose to mine ironsand throughout the Northern, Central and Southern Blocks excluding areas where mining restrictions will apply. The areas where mining activity will not take place are within 100 m of Mean High Water Springs, 30 m of perennial water bodies (Mitiwai Stream, Wainui Stream and Lake Taharoa), and within already identified urupa and archaeological re-interment areas on the mine. Other mining exclusion areas may be identified as part of the completion of technical assessments that are currently underway. Any additional mining exclusion areas that are identified by the technical assessments will be included in the substantive FTAA applications.

Whilst the process to extract, process and export the ironsand can and does vary depending on the nature of the deposit being mined at the time, it follows the same broad steps. These activities, which are sought to be authorised as part of the Central and Southern Block Project, include:

1. **Vegetation, topsoil and overburden removal, including harvesting of trees with commercial value (pines).** Useful native species are removed prior to stripping of topsoil for use in the eco-sourced nursery on site. Topsoil is stockpiled on-site for use in future rehabilitation activities.
2. **Extraction and processing of Ironsand.** Raw Ironsand is extracted using various methods and equipment depending on ground conditions. In upper layers, standard earthmoving machinery such as excavators, bulldozers, and trucks are used to collect the ironsand and deposit it into a Dry Mining Unit (DMU). The DMU mixes the ironsand with water to form a slurry, which is then pumped to a treatment plant for titanomagnetite extraction.
3. During this process, groundwater and surface water may enter the active excavation area. To maintain dry working conditions, this water may be pumped out as required. However, as mining progresses to deeper layers, maintaining a dry pit may become impractical. In such cases, a cutter-suction dredge is used in a water-filled pond. The dredge floats on the water and uses a submerged dredge head to cut, fluidise, and pump the Ironsand slurry through a pipeline to the treatment plant. The dredge is capable of operating at depths of 8 to 15 meters below the pond surface. In some instances, a long-reach excavator may also be used to extract material from within the pond.
4. **Processing.** The extracted ironsand is transported to a centralised processing plant where it is concentrated and processed. The ironsand is refined using screening and gravity separation. The ironsand is mixed into a slurry and pumped through a seabed pipeline to a bulk carrier ship moored at the Port of Taharoa. The export pipelines run from the processing and storage facility located on land to a Single Buoy Mooring (SBM), located approximately 3.5 km offshore.
5. **Ship loading and dewatering.** Bulk carrier ships moor at the SBM to receive the ironsand in slurry form from the export pipelines. Each ship contains dewatering equipment and the resulting freshwater, containing residual fine suspended material (inert, inorganic geological material) that is removed from the ironsand slurry, is discharged from the ship to the sea. The discharge forms a buoyant plume that floats on the seawater surface before dispersal and dilution. Ship loading operations are currently undertaken approximately 20 times per year and will increase in frequency in future as production increases up to a projected maximum of 35 times per year. Each ship loading activity takes approximately 90 hours (of pumping time) however weather conditions have an influence on loading timeframes.

6. **Tailings disposal and rehabilitation of mined areas.** The tailings (ferrous and non-ferrous sand, silts and clays) which are separated from the exportable product are pumped as a slurry to tailings disposal areas. The discharged slurry dewateres by gravity, with the drainage water collected and directed into a settlement pond or ponds. Once the tailings have dewatered, mechanical plant (excavators and dozers) redistribute the material to form the grade and levels required by the rehabilitation plan for that area. Following this the land may be stabilised, top soiled and replanted.

To operate the mine, the process requires the abstraction of water from the Wainui Stream via a constructed dam incorporating a fish pass, and the discharge of stormwater to the Wainui Stream and the discharge of process water to settling ponds. Excess stormwater and process water is discharged to the CMA via the ship loading pipelines.

The activities sought to be authorised as part of the Northern Block Mining Project include (but are not limited to):

- (a) vegetation, topsoil and overburden removal, and excavation and processing of iron sand above and below the water table (as above);
- (b) the transportation of that product via temporary pipelines to the established processing plant on the Central and Southern Block;
- (c) processing (as above);
- (d) discharge of process water to land; and
- (e) tailing disposal and rehabilitation of mined areas (as above).

The Northern Block Mining Project will rely on / be supported by the processing infrastructure located on the Central and Southern Blocks. It will also rely on / be supported by the consents being sought for the Central and Southern Block to take and use water from the Wainui Stream, discharge of stormwater to the Wainui Stream and the CMA, discharge of process water to the CMA and transport of processed product from the processing facility through the ship-loading pipelines to the CMA. No changes are being proposed to the existing water take limits and discharge limits to facilitate mining of the Northern Block.

3 Approvals sought

3.1 Resource Management Act 1991

A summary of the resource consents that are required for the Northern, Central and Southern Blocks is set out below.

3.1.1 Resource consents required for the Northern Block

National Environmental Standard for Freshwater 2020 – consents to clear vegetation and undertake earthworks within and within 10m of a natural inland wetland. Consents are also required to take, use, dam, or divert water within and within 100 m of a natural inland wetland and to discharge water within and within 100 m of a natural inland wetland.

National Environmental Standard for Commercial Forestry 2017 – consent to harvest pine trees within Class 8e land.

Operative Waikato Regional Plan – consents for soil disturbance and vegetation clearance activities, diversion and taking of groundwater and surface of water associated with mining above and below the water table, discharge of a contaminant to land or water (process water and placement of tailings) and for overburden disposal to land.

Additionally, resource consent is required under the Operative Waitomo District Plan for the potential disturbance of archaeological sites recorded in the Plan - this consent applies to the Northern Block only given that mining has occurred since the early 1970's on the Central and Southern Blocks.

3.1.2 Resource consents required for the Central and Southern Blocks

The resource consents set out above are also required for the Central and Southern Blocks.² In addition, the following resource consents are required for the Central and Southern Blocks Project:

Operative Waikato Regional Plan – consents for the damming, diversion and taking of surface water and groundwater, for stream bed disturbance, and for the discharge of stormwater to surface water.

Operative and Proposed Waikato Regional Coastal Plans – consents for the use and occupation of the Coastal Marine Area by the export pipelines and the SBM, for discharges to and depositions in the CMA from shiploading activities, and for the discharge of stormwater from the export pipelines.

3.2 Wildlife Act 1953

A wildlife permit will be required to manage lizards if they are identified prior to vegetation removal or ground disturbance works.

3.3 Heritage New Zealand Pouhere Taonga Act 2014

Archaeological authorities will be sought due to the potential for currently undiscovered archaeological features to be disturbed by mining activities (excluding urupa and archaeological areas reserved from mining which will not be disturbed).

4 Benefits of the Projects

The continuation of the mining activity on the Taharoa C Block that will be facilitated by the approvals sought under the FTAA will generate significant regional and national benefits. The Central and Southern Block Mining Project and Northern Block Project will directly contribute billions to the New Zealand economy (through employment, income for landowners, business for regional supplies and the payment of taxes).

The mine provides significant employment opportunities for the community, particularly local Māori. Over 82% of income earned by local Ngāti Mahuta comes from employment at the mine. TIL has a core workforce of 170-80 people but employs upwards of 300 staff and contractors.

TIL relies on locally sourced goods and services including the supply of electricity and services from surrounding areas including Kawhia, Te Kuiti, Otorohanga, Te Awamutu and Hamilton. TIL also relies on specialist sub-contractor support including the maintenance and management of specialised mine machinery and equipment. The support TIL relies on (and will continue to rely on) from

² Excluding the resource consent required for archaeological site disturbance.

surrounding centres for the Northern Block Project and Central and Southern Block Mining Project will inject billions into the local economy over the life of the consents sought for the Project.

The mine also provides essential benefits to the local Taharoa Village which was established around the mine and exists today because of the substantial financial contribution the mine makes every year.

5 Summary of potential adverse effects on the environment

The following high-level summary of effects on the environment is based on technical assessments previously completed in relation to mining of the Central and Southern blocks. These assessments are currently being updated, and additional assessments are being completed for mining of the Northern Block. A full assessment of effects supported by technical assessments will be included in the applications for the Northern and Central/Southern Blocks respectively.

5.1 Effects common to the Northern, Central and Southern Blocks

5.1.1 Effects on terrestrial ecology (including bats, birds, lizards)

Disturbance from mining activities has the potential to have adverse effects on wetland and grassland bird species. The loss of existing grassland due to the mining activity may also result in potential injury or death of various threatened native skink present in low numbers in the grassland. The overall level of effect on terrestrial ecology has been assessed as being **low** with the provision of an over-arching Environmental Management Plan (EMP), including an Avifauna Management Plan, Bat Management Plan and a Lizard Management Plan, and imposition of appropriate conditions such as a requirement for there to be a 30 m planting buffer around all natural water bodies. Subject to the imposition of conditions, the overall level of effects on terrestrial ecology has been assessed as **minor**.

5.1.2 Effects of mining below the water table

When mining activity interacts with groundwater there may be the potential for adverse effects on surface freshwater bodies if there is a hydraulic connection between the groundwater and surface water. This connection will be carefully monitored. Any adverse effects on the primary freshwater bodies on the site (the Mitiwai Stream and the Wainui Stream) can be avoided and mitigated through consent conditions including for example, requirements to maintain a minimum flow within the streams.

5.1.3 Effects of discharge to land

The discharge of tailings and surplus process water to land has the potential to cause adverse effects on landform, groundwater and nearby waterways. The tailings material is re-formed as close as practicable to the original landform. The discharge of surplus process water does not result in contamination of groundwater due to the natural filtering provided by the sandy ground conditions. Overall, the adverse effects of discharges to land have been assessed as **less than minor**.

5.1.4 Land disturbance effects

The mining operation is located in a high-risk erosion area and the mining and stockpiling of iron sand has the potential to result in adverse effects on land stability. Given that the mine has a good operational history with no erosion issues requiring mitigation, a rehabilitation process and

revegetation plan is followed for disturbed areas, and perennial waterbody mining setbacks are imposed, any adverse effects can be considered **negligible**.

5.1.5 Archaeological effects

Taharoa C Block is and has always been Māori land which means that there is elevated potential for accidental discovery of koi iwi and other taonga in the dune environment of the area. Ngāti Mahuta derived tikanga and protocols apply when discoveries of koiwi and taonga occur in the Taharoa dune environment as a result of mining activity, and that tikanga/protocol is reflected in existing and proposed consent conditions. Defined urupā are located within the dune system where accidentally discovered koiwi are interred with appropriate tikanga being observed. A buffer in which no mining occurs is observed around each urupā.

All of these measures and practices will continue and mitigate the potential adverse effects in relation to archaeology to **less than minor** levels.

5.1.6 Cultural effects

In considering cultural effects, it is important to note the cultural benefits the ongoing operation of the mine has for Ngati Mahuta as tangata whenua. These benefits include employment benefits, royalties, and support for the local community. Ngati Mahuta, though the Taharoa C Block Incorporation, own the land on which the mine operates and is paid significant royalties from the mine. The mine also supports the employment and growth of Ngati Mahuta whanau. The local employment opportunity generated by the mine has allowed the local community to retain members of the community who may have otherwise moved away to seek employment elsewhere and lost their connection to the land.

TIL understand the views of the respective Taharoa Marae and Te Runanga in relation to the potential cultural effects of the Central and Southern Block Project. In summary, at a high-level:

The damming of the Wainui Stream has the potential to have adverse effects on the health of Lake Taharoa and its indigenous fishery, an important matter to Ngāti Mahuta. The maintenance of the effectiveness of the fish pass at the dam in the Wainui Stream is important to ensure the presence of indigenous fish species in the stream and lake upstream of the dam continues.

The maintenance and monitoring of baseflow in the Mitiwai Stream is also an important matter from a cultural perspective. TIL has engaged expert consultants to monitor the stream to ensure that TIL understands the potential effects of its mining activity on the Stream, which will be managed through consent conditions. Rehabilitation of the mine site to a sustainable landform and land cover is also an important matter to Ngāti Mahuta. Representatives of Ngāti Mahuta have shared their desire for the land to be returned to its natural state following mining activity (being rolling sand dunes with some pockets of vegetation). In that regard, TIL has developed and is implementing an overall Site Rehabilitation Plan and updated Conceptual Site Closure Plan in place to be implemented in the event that the mine closes in the future.

TIL propose to consult with the respective Taharoa Marae and Te Runanga in the preparation of the various management plans that govern the management of effects at the mine. Such consultation and engagement benefits both parties – TIL will gain the benefit of access to the skills and expertise that reside within the marae and hapu whanau, while marae and hapu whanau will have the opportunity to influence the content of management plans that will play an important part in managing the ongoing effects of the mining activity. TIL will also propose the provision of a website

which includes monthly monitoring records to communicate data to mana whenua and the community.

5.1.7 Air Quality Effects

The mine is located in an isolated location subject to extreme westerly winds. In this environment, there is potential for wind-blown sand from the mine site to generate adverse effects on adjoining and adjacent sites to the mine, including in Taharoa Village. TIL implement a range of avoidance and mitigation techniques to control such emissions including the erection of fencing to trap sand particles, placing ground cover (for example, coconut matting) on exposed areas, using mobile and automated fixed watering systems on internal site roads, enforcing vehicle speed limits, and progressively rehabilitating mined out areas. These measures mean that the mine site can operate in accordance with the relevant permitted activity rule of the Waikato Regional Plan with regards to air quality. TIL proposes to implement a Dust Management Plan to manage the implementation of these dust prevention mechanisms. Although there remains the potential for off-site discharges of dust due to the coastal environment, these discharges are highly unlikely to result in adverse effects to human health. Acoustic Effects

The mining activities have the potential to have adverse noise effects on key sensitive receptors on sites adjoining the Northern Block (1891 Taharoa Road, 1891A Taharoa Road, Te Kōraha Marae and 25 Rotopuhoe Road). However, these receptors are located several hundred metres from where mining will occur on the Northern Block and given this separation distance, it is expected that the works will be able to be managed to comply with the Waitomo District Plan daytime and nighttime noise limits. As a result, any potential adverse effects from noise from mining on the Northern Block on sensitive receivers is expected to be **less than minor**.

Mining on the Central and Southern Blocks has been continuous since the 1970s and benefits from existing use rights with respect to noise levels and associated acoustic effects. Notwithstanding this, noise levels are expected to be compliant with District Plan noise limits. TIL will continue to adopt the best practicable option to ensure that the emission of noise from these blocks does not exceed a reasonable level for any nearby sensitive receptors.

5.2 Effects relating to the Central and Southern Blocks only

5.2.1 Effects of damming Wainui Stream

Authorisation of the dam in the Wainui Stream will result in a similar water regime to what is currently present. Fish passage will be provided for via the monitoring and maintenance of a fish pass which achieves the intended purpose of allowing grey mullet and other targeted species to be able to navigate upstream to Lake Taharoa. The downstream migration of juvenile native fish can be adequately addressed through consent conditions which include the retention of a minimum flow within the fish pass and downstream of the dam, as well as monitoring of fish pass performance. As a result, the effects of the dam on fish passage has been assessed as **negligible**.

5.2.2 Effects on water quantity

Water is extracted from the impounded section of the Wainui Stream for mining and shiploading processes. Separate water take consents are held for the mining and shiploading takes and the consents cannot be exercised at the same time. The mine is currently operating within the historically consented limits for water abstraction and no further water quantity is required for the continued operation of the mine. The Wainui Stream catchment is not over-allocated and there are

no permits held by any other party to take water from the stream. As a result, adverse water quantity effects are avoided.

5.2.3 Effects of water take on marginal wetlands

The proposed water takes have the potential to have adverse effects on marginal wetlands around the edges of Lake Taharoa. Noting that the wetlands have acclimated to the lake levels that have been experienced since the installation of the dam in the Wainui Stream in the early 1970's, the magnitude of these effects has been assessed as **low** given that the water takes will be operated in a similar manner to what has been historically occurred at the mine. Importantly, TIL is proposing to retain existing conditions that require water takes to cease if the lake levels reach a certain minimum point. Conditions will also be proposed that require ongoing monitoring of the lake margin wetlands and management responses to be implemented if the lake level remains low for an extended period and the wetlands show signs of stress (other than that caused by natural seasonal conditions).

5.2.4 Effects on benthic fauna

The proposed ship-loading infrastructure including pipelines on the seabed and the tethering mechanism for the SBM will continue to occupy part of the seabed and impact on a small amount of available subtidal sandflat habitat. Given the small percentage of the available subtidal sandflat habitat this represents, this is assessed as having a low magnitude of effect on benthic ecology. The effects of constructing the pipeline have also been assessed as being **low**.

5.2.5 Effects on fish and seafood species

The discharge from the ship loading process has the potential to have adverse effects on existing habitat for fish and seafood species. Given the relatively infrequent and short-term nature of the discharge and the highly mobile nature of fish species the potential adverse effects are assessed as **negligible**. The presence of green lipped mussels in the area of the discharge indicates that ongoing ship loading discharges do not inhibit mussel colonisation and has a **negligible** effect on seafood resource species.

5.2.6 Effects on marine mammals

A number of marine mammal species can be present in the wider marine area around Port Taharoa such as Māui dolphins, common dolphins, southern right whales and Orca/killer whales. Given the low level of risk posed by the ship loading operation and the fact that it has been occurring in the vicinity since the early 1970's, the overall risk of adverse effects for marine mammals is assessed as **negligible**. Nevertheless, to recognise the sensitivity of the marine mammals that traverse the area, TIL propose conditions that require an underwater noise survey to be undertaken if 35 ship visits occur in a 12 month period, in order to inform best practice underwater noise measures.

5.2.7 Effects on coastal processes

TIL seeks to continue the ability to discharge up to 75,000m³ per day of ship loading water, including freshwater and fine sediment, up to a maximum of 7,500,000m³ per year. As a result of dilution and dispersion of the sediment plume provided by oceanic conditions, the effect of this discharge on coastal processes has been assessed as being **less than minor**.

5.2.8 Effects of discharges in the Coastal Marine Area (CMA)

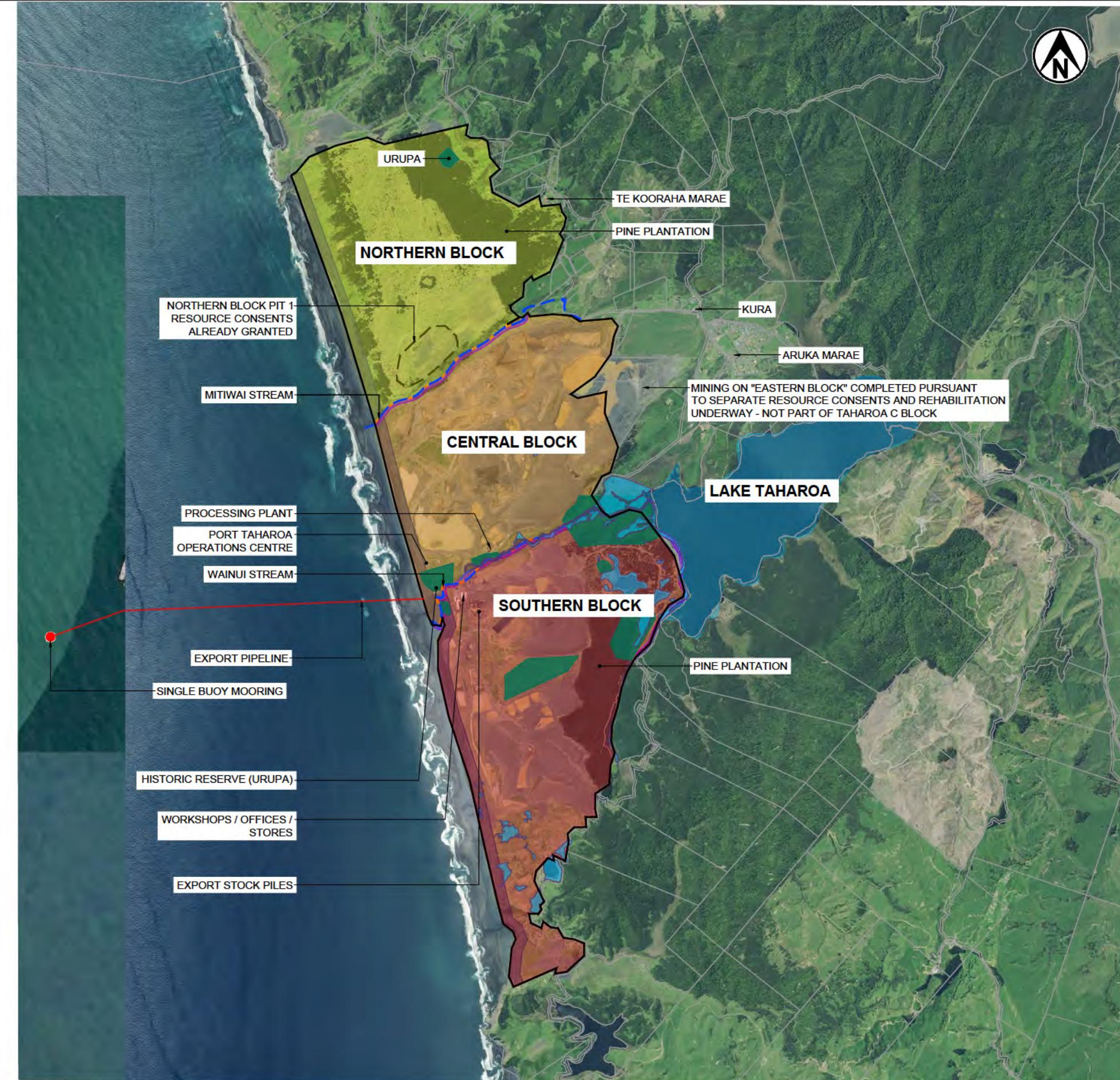
The potential adverse effects of the sediment discharge from the ship-loading events have been addressed above. The discharge includes some trace levels of naturally occurring contaminants in the ironsand that is pumped in slurry form into the ship. Because of the extremely low levels of the naturally occurring contaminants, and the dilution provided by the sea water, the discharge will not result in any measurable toxicity effect on benthic fauna.

TIL is seeking consent to continue to discharge excess process water and stormwater to the CMA at a rate of 32,000m³/day. This discharge occurs infrequently and when there is no suitable alternative to provide for the discharge on land - primarily at times of prolonged heavy rainfall. The potential ecological effects from the process water/stormwater discharge are likely to be even less than those of the ship loading discharge which were assessed to be less than minor. Correspondingly, no further actions to avoid, remedy or mitigate potential effects from the process wastewater and stormwater discharges are required apart from monitoring of the discharge quality and composition.

5.2.9 Effects on navigation safety

The continued ship movements to and from the Port of Taharoa and the occupation of the CMA by ship loading infrastructure have the potential to have adverse effects on navigational safety of other users of the CMA. However, the use of this area for recreational watercraft and commercial vessels is infrequent and the movement of ironsand export ships has been established in the area since the early 1970's. No more than one ship can access the mooring buoy at one time. Furthermore, the Port of Taharoa is operated in compliance with the New Zealand Port and Harbour Marine Safety Code, the Harbourmaster previously had no objection to the continued activity and several improvements have been implemented since the granting of the now expired resource consents in 2002. For these reasons, potential adverse effects on navigation safety have been assessed as **less than minor**.

LEGEND	
	STREAM
	PROPERTY BOUNDARIES
	MINING LICENCE AREA (TAHAROA C BLOCK)
	NORTHERN BLOCK
	CENTRAL BLOCK
	SOUTHERN BLOCK
	30m PERENNIAL WATER BODY / STREAM SETBACK
	100m MHWS SETBACK SUBJECT TO SURVEY
	ARCHEOLOGICAL AREAS RESERVED FROM MINING
	WETLAND



Holly-Marie Rearic

From: Coffey, Wayne WC [REDACTED]
Sent: Monday, 23 June 2025 10:26 am
To: Holly-Marie Rearic
Subject: Fwd: Invitation to provide written feedback – Taharoa Ironsands Limited Fast-track Applications
Attachments: Consultation letter to John David Keepa Kupa Whanau Trust dated 21 May 2025.pdf

Sent from my iPad

Begin forwarded message:

From: "Coffey, Wayne WC" [REDACTED]
Date: 26 May 2025 at 12:26:46 PM NZST
To: [REDACTED]
Subject: Invitation to provide written feedback – Taharoa Ironsands Limited Fast-track Applications

Kia ora David

Please see the **attached** letter in relation to applications that TIL is preparing for the Central and Southern Block Project and Northern Block Project under the Fast-track Approvals Act 2024.

We have previously engaged with you in respect of our RMA application for the Central and Southern Blocks. We want to provide you with the opportunity to provide further feedback on TIL's Fast-track applications.

Regards

Wayne



Taharoa Ironsands Ltd

21 May 2025

BY EMAIL: [REDACTED]

John David Keepa Kupa Whānau Trust
[REDACTED]
[REDACTED]

Taharoa Ironsands Limited – Fast-track Approvals Act 2024 applications

1. As you know, Taharoa Ironsands Limited (**TIL**) owns and operates the Taharoa Ironsand Mine which has been in operation since 1973.
2. The Mine is divided into blocks known as the Northern, Central and Southern Block which are all located on Taharoa C Block, as well as the Eastern Blocks and the Te Mania Extension which are located on adjoining land.
3. TIL needs to replace its resource consents relating to the Central and Southern Blocks to continue operating the existing Mine and to enable expansion of the Mine in the future. TIL sought to do so by making an application in 2020 under the standard resource consenting process under the Resource Management Act 1991 (**RMA**). The consenting process under the RMA was lengthy and TIL was not satisfied with the decision, which led it to appeal the decision to the Environment Court on 12 December 2024.
4. Since the appeal was filed, the Fast-track Approvals Act 2024 (**FTAA**) has been enacted. The FTAA establishes a fast-track environmental approvals regime for projects of national and regional significance in New Zealand.
5. The reconsenting of the Central and Southern Blocks of the Mine has been recognised by the Government as having regional and national significance and has been directly referred to utilise the Fast-Track approval process. The FTAA therefore provides an alternative, and suitable, consenting pathway for TIL to apply for the resource consenting process for the Central and Southern Blocks. New mining of the Northern Block has also been directly referred by the Government to utilise the Fast-track process on account of its regional and national significance.
6. We are now preparing our substantive applications for both projects which will be considered under the FTAA. We are intending to file the applications with the Environmental Protection Agency in June/July 2025. Enviser is managing the preparation of the applications on behalf of TIL with input from a range of technical consultants, including Grant Eccles (planner) of Tonkin & Taylor Limited. Tonkin & Taylor has provided a high-level summary of what will be sought in each application in **Appendix A**.
7. We have previously engaged with you in respect of our application under the RMA for the Central and Southern Blocks, and you participated in the hearing of that application. TIL understands your view in respect of the Mine and the consenting of the Central and Southern Blocks from that process. However, we are writing to provide you with an opportunity to provide further written feedback on the FTAA applications, while they are being prepared.
8. We would appreciate that any written feedback is provided by 10 June 2025.

9. If you would like to provide written feedback, please let us know using the following email address: [REDACTED]

Yours faithfully



Wayne Coffey
Managing Director and CEO of Taharoa Ironsands Limited

Appendix A

Taharoa Ironsands Mine – Project summary for pre-application consultation

- **Northern Block Mining Project**
- **Central and Southern Block Mining Project**

1 Overview

Taharoa Ironsands Limited (TIL) operate an iron sand mine at Taharoa, on the West Coast of the North Island, approximately 8 km south of Kawhia Harbour. The Taharoa Mine has been in operation since 1973 (owned by New Zealand Steel until 2017). The mine site covers an area of approximately 1,300 hectares, primarily on Māori land legally described as the Taharoa C Block and the part of the coastal marine area (CMA) legally defined as Port Taharoa (**mine**).

For the purposes of mining activity, Taharoa C Block is divided into blocks. As shown on the attached plan:

- (a) the area of the site to the north of the Mitiwai Stream is known as the Northern Block.
- (b) the area of the site between the Mitiwai Stream and the Wainui Stream is known as the Central Block; and
- (c) the area of the site to the south of the Wainui Stream is known as the Southern Block.

The Central and Southern Blocks are currently operated under a suite of resource consents granted in 2006.¹ Mining activity has not historically occurred in the Northern Block.

TIL is now preparing applications for the necessary resource consents, wildlife permits and archaeological authorities under the Fast-track Approvals Act 2024 (FTAA) to authorise:

- the extraction of sand (and associated activities) on the Northern Block (known as the Northern Block Mining Project); and
- the continuation of sand extraction (and associated activities which support the entire mine, including its export operation) on the Central and Southern Blocks and in the CMA (known as the Central and Southern Block Mining Project).

The following describes the proposed mining and associated works which are subject to the applications, details the resource consents and approvals sought and provides a high-level summary of the potential effects on the environment of each project at this stage. As the applications are currently being prepared, this information is based on the work completed as of 01 May 2025, and is subject to change.

¹ TIL also hold separate resource consents for mining of (i) the “Eastern Block” granted in 2018 (mining now completed and rehabilitation underway), and (ii) the “Te Mania Extension” adjoining the Eastern Block granted in 2022 (mining yet to commence), and (iii) a small area in the Northern Block known as “Pit 1” granted in late 2024 (mining currently in progress). Mining at these locations relies on the water take resource consents and the coastal permits granted for the Central and Southern Blocks.

2 Description of proposed works

TIL propose to mine ironsand throughout the Northern, Central and Southern Blocks excluding areas where mining restrictions will apply. The areas where mining activity will not take place are within 100 m of Mean High Water Springs, 30 m of perennial water bodies (Mitiwai Stream, Wainui Stream and Lake Taharoa), and within already identified urupa and archaeological re-interment areas on the mine. Other mining exclusion areas may be identified as part of the completion of technical assessments that are currently underway. Any additional mining exclusion areas that are identified by the technical assessments will be included in the substantive FTAA applications.

Whilst the process to extract, process and export the ironsand can and does vary depending on the nature of the deposit being mined at the time, it follows the same broad steps. These activities, which are sought to be authorised as part of the Central and Southern Block Project, include:

1. **Vegetation, topsoil and overburden removal, including harvesting of trees with commercial value (pines).** Useful native species are removed prior to stripping of topsoil for use in the eco-sourced nursery on site. Topsoil is stockpiled on-site for use in future rehabilitation activities.
2. **Extraction and processing of Ironsand.** Raw Ironsand is extracted using various methods and equipment depending on ground conditions. In upper layers, standard earthmoving machinery such as excavators, bulldozers, and trucks are used to collect the ironsand and deposit it into a Dry Mining Unit (DMU). The DMU mixes the ironsand with water to form a slurry, which is then pumped to a treatment plant for titanomagnetite extraction.
3. During this process, groundwater and surface water may enter the active excavation area. To maintain dry working conditions, this water may be pumped out as required. However, as mining progresses to deeper layers, maintaining a dry pit may become impractical. In such cases, a cutter-suction dredge is used in a water-filled pond. The dredge floats on the water and uses a submerged dredge head to cut, fluidise, and pump the Ironsand slurry through a pipeline to the treatment plant. The dredge is capable of operating at depths of 8 to 15 meters below the pond surface. In some instances, a long-reach excavator may also be used to extract material from within the pond.
4. **Processing.** The extracted ironsand is transported to a centralised processing plant where it is concentrated and processed. The ironsand is refined using screening and gravity separation. The ironsand is mixed into a slurry and pumped through a seabed pipeline to a bulk carrier ship moored at the Port of Taharoa. The export pipelines run from the processing and storage facility located on land to a Single Buoy Mooring (SBM), located approximately 3.5 km offshore.
5. **Ship loading and dewatering.** Bulk carrier ships moor at the SBM to receive the ironsand in slurry form from the export pipelines. Each ship contains dewatering equipment and the resulting freshwater, containing residual fine suspended material (inert, inorganic geological material) that is removed from the ironsand slurry, is discharged from the ship to the sea. The discharge forms a buoyant plume that floats on the seawater surface before dispersal and dilution. Ship loading operations are currently undertaken approximately 20 times per year and will increase in frequency in future as production increases up to a projected maximum of 35 times per year. Each ship loading activity takes approximately 90 hours (of pumping time) however weather conditions have an influence on loading timeframes.

6. **Tailings disposal and rehabilitation of mined areas.** The tailings (ferrous and non-ferrous sand, silts and clays) which are separated from the exportable product are pumped as a slurry to tailings disposal areas. The discharged slurry dewateres by gravity, with the drainage water collected and directed into a settlement pond or ponds. Once the tailings have dewatered, mechanical plant (excavators and dozers) redistribute the material to form the grade and levels required by the rehabilitation plan for that area. Following this the land may be stabilised, top soiled and replanted.

To operate the mine, the process requires the abstraction of water from the Wainui Stream via a constructed dam incorporating a fish pass, and the discharge of stormwater to the Wainui Stream and the discharge of process water to settling ponds. Excess stormwater and process water is discharged to the CMA via the ship loading pipelines.

The activities sought to be authorised as part of the Northern Block Mining Project include (but are not limited to):

- (a) vegetation, topsoil and overburden removal, and excavation and processing of iron sand above and below the water table (as above);
- (b) the transportation of that product via temporary pipelines to the established processing plant on the Central and Southern Block;
- (c) processing (as above);
- (d) discharge of process water to land; and
- (e) tailing disposal and rehabilitation of mined areas (as above).

The Northern Block Mining Project will rely on / be supported by the processing infrastructure located on the Central and Southern Blocks. It will also rely on / be supported by the consents being sought for the Central and Southern Block to take and use water from the Wainui Stream, discharge of stormwater to the Wainui Stream and the CMA, discharge of process water to the CMA and transport of processed product from the processing facility through the ship-loading pipelines to the CMA. No changes are being proposed to the existing water take limits and discharge limits to facilitate mining of the Northern Block.

3 Approvals sought

3.1 Resource Management Act 1991

A summary of the resource consents that are required for the Northern, Central and Southern Blocks is set out below.

3.1.1 Resource consents required for the Northern Block

National Environmental Standard for Freshwater 2020 – consents to clear vegetation and undertake earthworks within and within 10m of a natural inland wetland. Consents are also required to take, use, dam, or divert water within and within 100 m of a natural inland wetland and to discharge water within and within 100 m of a natural inland wetland.

National Environmental Standard for Commercial Forestry 2017 – consent to harvest pine trees within Class 8e land.

Operative Waikato Regional Plan – consents for soil disturbance and vegetation clearance activities, diversion and taking of groundwater and surface of water associated with mining above and below the water table, discharge of a contaminant to land or water (process water and placement of tailings) and for overburden disposal to land.

Additionally, resource consent is required under the Operative Waitomo District Plan for the potential disturbance of archaeological sites recorded in the Plan - this consent applies to the Northern Block only given that mining has occurred since the early 1970's on the Central and Southern Blocks.

3.1.2 Resource consents required for the Central and Southern Blocks

The resource consents set out above are also required for the Central and Southern Blocks.² In addition, the following resource consents are required for the Central and Southern Blocks Project:

Operative Waikato Regional Plan – consents for the damming, diversion and taking of surface water and groundwater, for stream bed disturbance, and for the discharge of stormwater to surface water.

Operative and Proposed Waikato Regional Coastal Plans – consents for the use and occupation of the Coastal Marine Area by the export pipelines and the SBM, for discharges to and depositions in the CMA from shiploading activities, and for the discharge of stormwater from the export pipelines.

3.2 Wildlife Act 1953

A wildlife permit will be required to manage lizards if they are identified prior to vegetation removal or ground disturbance works.

3.3 Heritage New Zealand Pouhere Taonga Act 2014

Archaeological authorities will be sought due to the potential for currently undiscovered archaeological features to be disturbed by mining activities (excluding urupa and archaeological areas reserved from mining which will not be disturbed).

4 Benefits of the Projects

The continuation of the mining activity on the Taharoa C Block that will be facilitated by the approvals sought under the FTAA will generate significant regional and national benefits. The Central and Southern Block Mining Project and Northern Block Project will directly contribute billions to the New Zealand economy (through employment, income for landowners, business for regional supplies and the payment of taxes).

The mine provides significant employment opportunities for the community, particularly local Māori. Over 82% of income earned by local Ngāti Mahuta comes from employment at the mine. TIL has a core workforce of 170-80 people but employs upwards of 300 staff and contractors.

TIL relies on locally sourced goods and services including the supply of electricity and services from surrounding areas including Kawhia, Te Kuiti, Otorohanga, Te Awamutu and Hamilton. TIL also relies on specialist sub-contractor support including the maintenance and management of specialised mine machinery and equipment. The support TIL relies on (and will continue to rely on) from

² Excluding the resource consent required for archaeological site disturbance.

surrounding centres for the Northern Block Project and Central and Southern Block Mining Project will inject billions into the local economy over the life of the consents sought for the Project.

The mine also provides essential benefits to the local Taharoa Village which was established around the mine and exists today because of the substantial financial contribution the mine makes every year.

5 Summary of potential adverse effects on the environment

The following high-level summary of effects on the environment is based on technical assessments previously completed in relation to mining of the Central and Southern blocks. These assessments are currently being updated, and additional assessments are being completed for mining of the Northern Block. A full assessment of effects supported by technical assessments will be included in the applications for the Northern and Central/Southern Blocks respectively.

5.1 Effects common to the Northern, Central and Southern Blocks

5.1.1 Effects on terrestrial ecology (including bats, birds, lizards)

Disturbance from mining activities has the potential to have adverse effects on wetland and grassland bird species. The loss of existing grassland due to the mining activity may also result in potential injury or death of various threatened native skink present in low numbers in the grassland. The overall level of effect on terrestrial ecology has been assessed as being **low** with the provision of an over-arching Environmental Management Plan (EMP), including an Avifauna Management Plan, Bat Management Plan and a Lizard Management Plan, and imposition of appropriate conditions such as a requirement for there to be a 30 m planting buffer around all natural water bodies. Subject to the imposition of conditions, the overall level of effects on terrestrial ecology has been assessed as **minor**.

5.1.2 Effects of mining below the water table

When mining activity interacts with groundwater there may be the potential for adverse effects on surface freshwater bodies if there is a hydraulic connection between the groundwater and surface water. This connection will be carefully monitored. Any adverse effects on the primary freshwater bodies on the site (the Mitiwai Stream and the Wainui Stream) can be avoided and mitigated through consent conditions including for example, requirements to maintain a minimum flow within the streams.

5.1.3 Effects of discharge to land

The discharge of tailings and surplus process water to land has the potential to cause adverse effects on landform, groundwater and nearby waterways. The tailings material is re-formed as close as practicable to the original landform. The discharge of surplus process water does not result in contamination of groundwater due to the natural filtering provided by the sandy ground conditions. Overall, the adverse effects of discharges to land have been assessed as **less than minor**.

5.1.4 Land disturbance effects

The mining operation is located in a high-risk erosion area and the mining and stockpiling of iron sand has the potential to result in adverse effects on land stability. Given that the mine has a good operational history with no erosion issues requiring mitigation, a rehabilitation process and

revegetation plan is followed for disturbed areas, and perennial waterbody mining setbacks are imposed, any adverse effects can be considered **negligible**.

5.1.5 Archaeological effects

Taharoa C Block is and has always been Māori land which means that there is elevated potential for accidental discovery of koi iwi and other taonga in the dune environment of the area. Ngāti Mahuta derived tikanga and protocols apply when discoveries of koiwi and taonga occur in the Taharoa dune environment as a result of mining activity, and that tikanga/protocol is reflected in existing and proposed consent conditions. Defined urupā are located within the dune system where accidentally discovered koiwi are interred with appropriate tikanga being observed. A buffer in which no mining occurs is observed around each urupā.

All of these measures and practices will continue and mitigate the potential adverse effects in relation to archaeology to **less than minor** levels.

5.1.6 Cultural effects

In considering cultural effects, it is important to note the cultural benefits the ongoing operation of the mine has for Ngati Mahuta as tangata whenua. These benefits include employment benefits, royalties, and support for the local community. Ngati Mahuta, though the Taharoa C Block Incorporation, own the land on which the mine operates and is paid significant royalties from the mine. The mine also supports the employment and growth of Ngati Mahuta whanau. The local employment opportunity generated by the mine has allowed the local community to retain members of the community who may have otherwise moved away to seek employment elsewhere and lost their connection to the land.

TIL understand the views of the respective Taharoa Marae and Te Runanga in relation to the potential cultural effects of the Central and Southern Block Project. In summary, at a high-level:

The damming of the Wainui Stream has the potential to have adverse effects on the health of Lake Taharoa and its indigenous fishery, an important matter to Ngāti Mahuta. The maintenance of the effectiveness of the fish pass at the dam in the Wainui Stream is important to ensure the presence of indigenous fish species in the stream and lake upstream of the dam continues.

The maintenance and monitoring of baseflow in the Mitiwai Stream is also an important matter from a cultural perspective. TIL has engaged expert consultants to monitor the stream to ensure that TIL understands the potential effects of its mining activity on the Stream, which will be managed through consent conditions. Rehabilitation of the mine site to a sustainable landform and land cover is also an important matter to Ngāti Mahuta. Representatives of Ngāti Mahuta have shared their desire for the land to be returned to its natural state following mining activity (being rolling sand dunes with some pockets of vegetation). In that regard, TIL has developed and is implementing an overall Site Rehabilitation Plan and updated Conceptual Site Closure Plan in place to be implemented in the event that the mine closes in the future.

TIL propose to consult with the respective Taharoa Marae and Te Runanga in the preparation of the various management plans that govern the management of effects at the mine. Such consultation and engagement benefits both parties – TIL will gain the benefit of access to the skills and expertise that reside within the marae and hapu whanau, while marae and hapu whanau will have the opportunity to influence the content of management plans that will play an important part in managing the ongoing effects of the mining activity. TIL will also propose the provision of a website

which includes monthly monitoring records to communicate data to mana whenua and the community.

5.1.7 Air Quality Effects

The mine is located in an isolated location subject to extreme westerly winds. In this environment, there is potential for wind-blown sand from the mine site to generate adverse effects on adjoining and adjacent sites to the mine, including in Taharoa Village. TIL implement a range of avoidance and mitigation techniques to control such emissions including the erection of fencing to trap sand particles, placing ground cover (for example, coconut matting) on exposed areas, using mobile and automated fixed watering systems on internal site roads, enforcing vehicle speed limits, and progressively rehabilitating mined out areas. These measures mean that the mine site can operate in accordance with the relevant permitted activity rule of the Waikato Regional Plan with regards to air quality. TIL proposes to implement a Dust Management Plan to manage the implementation of these dust prevention mechanisms. Although there remains the potential for off-site discharges of dust due to the coastal environment, these discharges are highly unlikely to result in adverse effects to human health. Acoustic Effects

The mining activities have the potential to have adverse noise effects on key sensitive receptors on sites adjoining the Northern Block (1891 Taharoa Road, 1891A Taharoa Road, Te Kōraha Marae and 25 Rotopuhoe Road). However, these receptors are located several hundred metres from where mining will occur on the Northern Block and given this separation distance, it is expected that the works will be able to be managed to comply with the Waitomo District Plan daytime and nighttime noise limits. As a result, any potential adverse effects from noise from mining on the Northern Block on sensitive receivers is expected to be **less than minor**.

Mining on the Central and Southern Blocks has been continuous since the 1970s and benefits from existing use rights with respect to noise levels and associated acoustic effects. Notwithstanding this, noise levels are expected to be compliant with District Plan noise limits. TIL will continue to adopt the best practicable option to ensure that the emission of noise from these blocks does not exceed a reasonable level for any nearby sensitive receptors.

5.2 Effects relating to the Central and Southern Blocks only

5.2.1 Effects of damming Wainui Stream

Authorisation of the dam in the Wainui Stream will result in a similar water regime to what is currently present. Fish passage will be provided for via the monitoring and maintenance of a fish pass which achieves the intended purpose of allowing grey mullet and other targeted species to be able to navigate upstream to Lake Taharoa. The downstream migration of juvenile native fish can be adequately addressed through consent conditions which include the retention of a minimum flow within the fish pass and downstream of the dam, as well as monitoring of fish pass performance. As a result, the effects of the dam on fish passage has been assessed as **negligible**.

5.2.2 Effects on water quantity

Water is extracted from the impounded section of the Wainui Stream for mining and shiploading processes. Separate water take consents are held for the mining and shiploading takes and the consents cannot be exercised at the same time. The mine is currently operating within the historically consented limits for water abstraction and no further water quantity is required for the continued operation of the mine. The Wainui Stream catchment is not over-allocated and there are

no permits held by any other party to take water from the stream. As a result, adverse water quantity effects are avoided.

5.2.3 Effects of water take on marginal wetlands

The proposed water takes have the potential to have adverse effects on marginal wetlands around the edges of Lake Taharoa. Noting that the wetlands have acclimated to the lake levels that have been experienced since the installation of the dam in the Wainui Stream in the early 1970's, the magnitude of these effects has been assessed as **low** given that the water takes will be operated in a similar manner to what has been historically occurred at the mine. Importantly, TIL is proposing to retain existing conditions that require water takes to cease if the lake levels reach a certain minimum point. Conditions will also be proposed that require ongoing monitoring of the lake margin wetlands and management responses to be implemented if the lake level remains low for an extended period and the wetlands show signs of stress (other than that caused by natural seasonal conditions).

5.2.4 Effects on benthic fauna

The proposed ship-loading infrastructure including pipelines on the seabed and the tethering mechanism for the SBM will continue to occupy part of the seabed and impact on a small amount of available subtidal sandflat habitat. Given the small percentage of the available subtidal sandflat habitat this represents, this is assessed as having a low magnitude of effect on benthic ecology. The effects of constructing the pipeline have also been assessed as being **low**.

5.2.5 Effects on fish and seafood species

The discharge from the ship loading process has the potential to have adverse effects on existing habitat for fish and seafood species. Given the relatively infrequent and short-term nature of the discharge and the highly mobile nature of fish species the potential adverse effects are assessed as **negligible**. The presence of green lipped mussels in the area of the discharge indicates that ongoing ship loading discharges do not inhibit mussel colonisation and has a **negligible** effect on seafood resource species.

5.2.6 Effects on marine mammals

A number of marine mammal species can be present in the wider marine area around Port Taharoa such as Māui dolphins, common dolphins, southern right whales and Orca/killer whales. Given the low level of risk posed by the ship loading operation and the fact that it has been occurring in the vicinity since the early 1970's, the overall risk of adverse effects for marine mammals is assessed as **negligible**. Nevertheless, to recognise the sensitivity of the marine mammals that traverse the area, TIL propose conditions that require an underwater noise survey to be undertaken if 35 ship visits occur in a 12 month period, in order to inform best practice underwater noise measures.

5.2.7 Effects on coastal processes

TIL seeks to continue the ability to discharge up to 75,000m³ per day of ship loading water, including freshwater and fine sediment, up to a maximum of 7,500,000m³ per year. As a result of dilution and dispersion of the sediment plume provided by oceanic conditions, the effect of this discharge on coastal processes has been assessed as being **less than minor**.

5.2.8 Effects of discharges in the Coastal Marine Area (CMA)

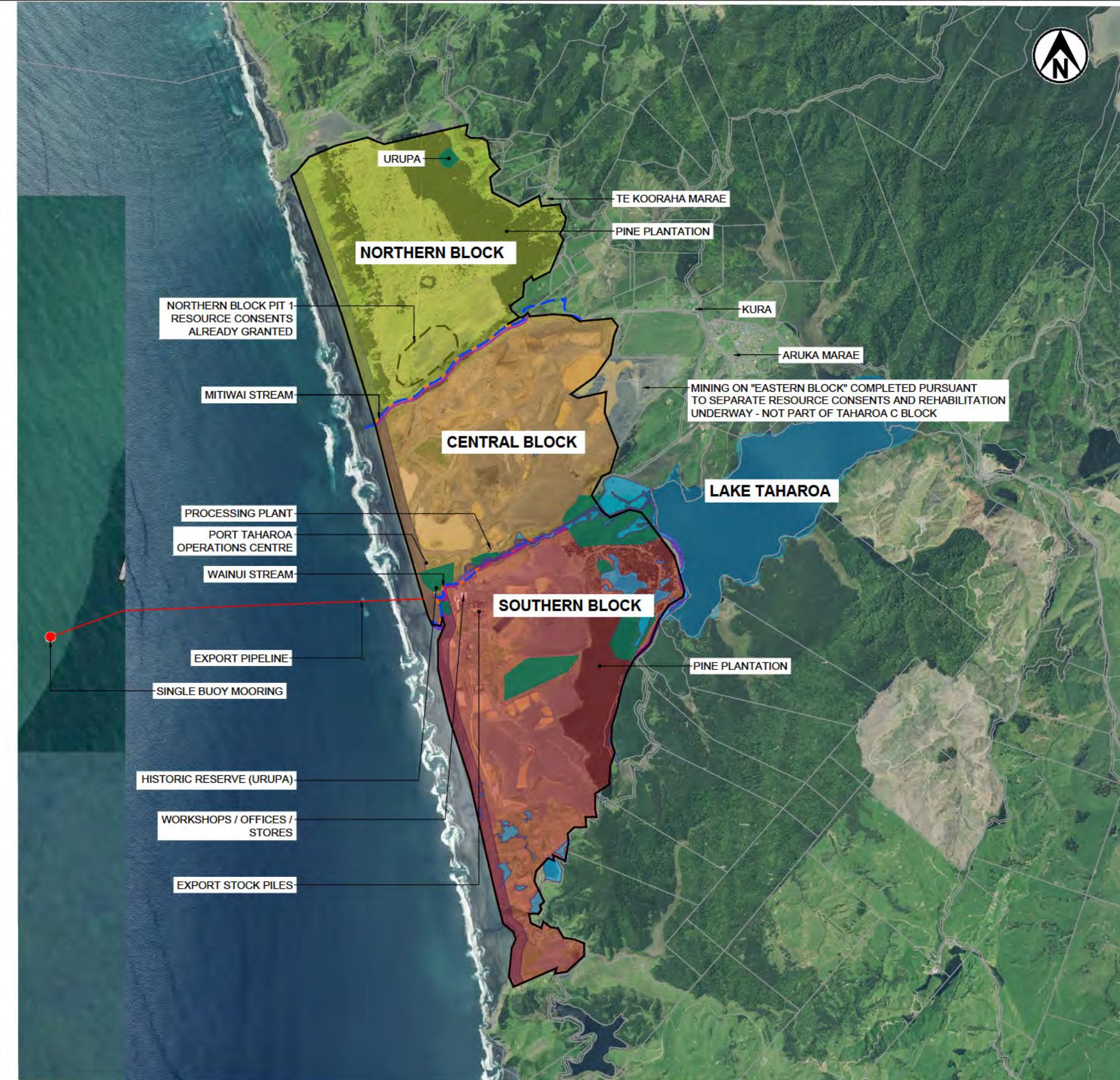
The potential adverse effects of the sediment discharge from the ship-loading events have been addressed above. The discharge includes some trace levels of naturally occurring contaminants in the ironsand that is pumped in slurry form into the ship. Because of the extremely low levels of the naturally occurring contaminants, and the dilution provided by the sea water, the discharge will not result in any measurable toxicity effect on benthic fauna.

TIL is seeking consent to continue to discharge excess process water and stormwater to the CMA at a rate of 32,000m³/day. This discharge occurs infrequently and when there is no suitable alternative to provide for the discharge on land - primarily at times of prolonged heavy rainfall. The potential ecological effects from the process water/stormwater discharge are likely to be even less than those of the ship loading discharge which were assessed to be less than minor. Correspondingly, no further actions to avoid, remedy or mitigate potential effects from the process wastewater and stormwater discharges are required apart from monitoring of the discharge quality and composition.

5.2.9 Effects on navigation safety

The continued ship movements to and from the Port of Taharoa and the occupation of the CMA by ship loading infrastructure have the potential to have adverse effects on navigational safety of other users of the CMA. However, the use of this area for recreational watercraft and commercial vessels is infrequent and the movement of ironsand export ships has been established in the area since the early 1970's. No more than one ship can access the mooring buoy at one time. Furthermore, the Port of Taharoa is operated in compliance with the New Zealand Port and Harbour Marine Safety Code, the Harbourmaster previously had no objection to the continued activity and several improvements have been implemented since the granting of the now expired resource consents in 2002. For these reasons, potential adverse effects on navigation safety have been assessed as **less than minor**.

LEGEND	
	STREAM
	PROPERTY BOUNDARIES
	MINING LICENCE AREA (TAHAROA C BLOCK)
	NORTHERN BLOCK
	CENTRAL BLOCK
	SOUTHERN BLOCK
	30m PERENNIAL WATER BODY / STREAM SETBACK
	100m MHWS SETBACK SUBJECT TO SURVEY
	ARCHEOLOGICAL AREAS RESERVED FROM MINING
	WETLAND



From: Coffey, Wayne WC <[REDACTED]>
Sent: Monday, 23 June 2025 10:26 am
To: Holly-Marie Rearic
Subject: Fwd: Invitation to provide written feedback – Taharoa Ironsands Limited Fast-track Applications
Attachments: Consultation letter to Tahaaroa Lakes Trust dated 21 May 2025.pdf

Sent from my iPad

Begin forwarded message:

From: "Coffey, Wayne WC" [REDACTED]
Date: 26 May 2025 at 12:25:04 PM NZST
To: Tahaaroalakestrust@gmail.com
Subject: Invitation to provide written feedback – Taharoa Ironsands Limited Fast-track Applications

Kia ora Ngahuia

Please see the **attached** letter in relation to applications that TIL is preparing for the Central and Southern Block Project and Northern Block Project under the Fast-track Approvals Act 2024.

We have previously engaged with you in respect of our RMA application for the Central and Southern Blocks. We want to provide you with the opportunity to provide further feedback on TIL's Fast-track applications.

Regards

Wayne



Taharoa Ironsands Ltd

21 May 2025

BY EMAIL: Tahaaroalakestrust@gmail.com

Tahaaroa Lakes Trust
C/- Ngahuia Herangi
Tahaaroa Lakes Trust Chair
[REDACTED]

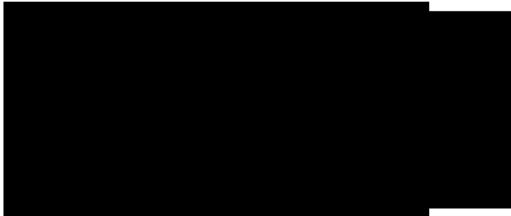
Dear Ngahuia

Taharoa Ironsands Limited – Fast-track Approvals Act 2024 applications

1. As you know, Taharoa Ironsands Limited (**TIL**) owns and operates the Taharoa Ironsand Mine which has been in operation since 1973.
2. The Mine is divided into blocks known as the Northern, Central and Southern Block which are all located on Taharoa C Block, as well as the Eastern Blocks and the Te Mania Extension which are located on adjoining land.
3. TIL needs to replace its resource consents relating to the Central and Southern Blocks to continue operating the existing Mine and to enable expansion of the Mine in the future. TIL sought to do so by making an application in 2020 under the standard resource consenting process under the Resource Management Act 1991 (**RMA**). The consenting process under the RMA was lengthy and TIL was not satisfied with the decision, which led it to appeal the decision to the Environment Court on 12 December 2024.
4. Since the appeal was filed, the Fast-track Approvals Act 2024 (**FTAA**) has been enacted. The FTAA establishes a fast-track environmental approvals regime for projects of national and regional significance in New Zealand.
5. The reconsenting of the Central and Southern Blocks of the Mine has been recognised by the Government as having regional and national significance and has been directly referred to utilise the Fast-Track approval process. The FTAA therefore provides an alternative, and suitable, consenting pathway for TIL to apply for the resource consenting process for the Central and Southern Blocks. New mining of the Northern Block has also been directly referred by the Government to utilise the Fast-track process on account of its regional and national significance.
6. We are now preparing our substantive applications for both projects which will be considered under the FTAA. We are intending to file the applications with the Environmental Protection Agency by no later than June 2025. Enviser is managing the preparation of the applications on behalf of TIL with input from a range of technical consultants, including Grant Eccles (planner) of Tonkin & Taylor Limited. Tonkin & Taylor has provided a high-level summary of what will be sought in each application in **Appendix A**.
7. The Trust participated in the hearing of that application, and we therefore understand the Trust's views in respect of the Mine and the consenting of the Central and Southern Blocks from that process. However, we are writing to provide you with an opportunity to provide further written feedback on the FTAA applications, while they are being prepared.
8. We would appreciate that any written feedback is provided by 10 June 2025.

9. If you would like to provide written feedback, please let us know using the following email address: [REDACTED]

Yours faithfully



Wayne Coffey
Managing Director and CEO of Taharoa Ironsands Limited

Appendix A

Taharoa Ironsands Mine – Project summary for pre-application consultation

- **Northern Block Mining Project**
- **Central and Southern Block Mining Project**

1 Overview

Taharoa Ironsands Limited (TIL) operate an iron sand mine at Taharoa, on the West Coast of the North Island, approximately 8 km south of Kawhia Harbour. The Taharoa Mine has been in operation since 1973 (owned by New Zealand Steel until 2017). The mine site covers an area of approximately 1,300 hectares, primarily on Māori land legally described as the Taharoa C Block and the part of the coastal marine area (CMA) legally defined as Port Taharoa (**mine**).

For the purposes of mining activity, Taharoa C Block is divided into blocks. As shown on the attached plan:

- (a) the area of the site to the north of the Mitiwai Stream is known as the Northern Block.
- (b) the area of the site between the Mitiwai Stream and the Wainui Stream is known as the Central Block; and
- (c) the area of the site to the south of the Wainui Stream is known as the Southern Block.

The Central and Southern Blocks are currently operated under a suite of resource consents granted in 2006.¹ Mining activity has not historically occurred in the Northern Block.

TIL is now preparing applications for the necessary resource consents, wildlife permits and archaeological authorities under the Fast-track Approvals Act 2024 (FTAA) to authorise:

- the extraction of sand (and associated activities) on the Northern Block (known as the Northern Block Mining Project); and
- the continuation of sand extraction (and associated activities which support the entire mine, including its export operation) on the Central and Southern Blocks and in the CMA (known as the Central and Southern Block Mining Project).

The following describes the proposed mining and associated works which are subject to the applications, details the resource consents and approvals sought and provides a high-level summary of the potential effects on the environment of each project at this stage. As the applications are currently being prepared, this information is based on the work completed as of 01 May 2025, and is subject to change.

¹ TIL also hold separate resource consents for mining of (i) the “Eastern Block” granted in 2018 (mining now completed and rehabilitation underway), and (ii) the “Te Mania Extension” adjoining the Eastern Block granted in 2022 (mining yet to commence), and (iii) a small area in the Northern Block known as “Pit 1” granted in late 2024 (mining currently in progress). Mining at these locations relies on the water take resource consents and the coastal permits granted for the Central and Southern Blocks.

2 Description of proposed works

TIL propose to mine ironsand throughout the Northern, Central and Southern Blocks excluding areas where mining restrictions will apply. The areas where mining activity will not take place are within 100 m of Mean High Water Springs, 30 m of perennial water bodies (Mitiwai Stream, Wainui Stream and Lake Taharoa), and within already identified urupa and archaeological re-interment areas on the mine. Other mining exclusion areas may be identified as part of the completion of technical assessments that are currently underway. Any additional mining exclusion areas that are identified by the technical assessments will be included in the substantive FTAA applications.

Whilst the process to extract, process and export the ironsand can and does vary depending on the nature of the deposit being mined at the time, it follows the same broad steps. These activities, which are sought to be authorised as part of the Central and Southern Block Project, include:

1. **Vegetation, topsoil and overburden removal, including harvesting of trees with commercial value (pines).** Useful native species are removed prior to stripping of topsoil for use in the eco-sourced nursery on site. Topsoil is stockpiled on-site for use in future rehabilitation activities.
2. **Extraction and processing of Ironsand.** Raw Ironsand is extracted using various methods and equipment depending on ground conditions. In upper layers, standard earthmoving machinery such as excavators, bulldozers, and trucks are used to collect the ironsand and deposit it into a Dry Mining Unit (DMU). The DMU mixes the ironsand with water to form a slurry, which is then pumped to a treatment plant for titanomagnetite extraction.
3. During this process, groundwater and surface water may enter the active excavation area. To maintain dry working conditions, this water may be pumped out as required. However, as mining progresses to deeper layers, maintaining a dry pit may become impractical. In such cases, a cutter-suction dredge is used in a water-filled pond. The dredge floats on the water and uses a submerged dredge head to cut, fluidise, and pump the Ironsand slurry through a pipeline to the treatment plant. The dredge is capable of operating at depths of 8 to 15 meters below the pond surface. In some instances, a long-reach excavator may also be used to extract material from within the pond.
4. **Processing.** The extracted ironsand is transported to a centralised processing plant where it is concentrated and processed. The ironsand is refined using screening and gravity separation. The ironsand is mixed into a slurry and pumped through a seabed pipeline to a bulk carrier ship moored at the Port of Taharoa. The export pipelines run from the processing and storage facility located on land to a Single Buoy Mooring (SBM), located approximately 3.5 km offshore.
5. **Ship loading and dewatering.** Bulk carrier ships moor at the SBM to receive the ironsand in slurry form from the export pipelines. Each ship contains dewatering equipment and the resulting freshwater, containing residual fine suspended material (inert, inorganic geological material) that is removed from the ironsand slurry, is discharged from the ship to the sea. The discharge forms a buoyant plume that floats on the seawater surface before dispersal and dilution. Ship loading operations are currently undertaken approximately 20 times per year and will increase in frequency in future as production increases up to a projected maximum of 35 times per year. Each ship loading activity takes approximately 90 hours (of pumping time) however weather conditions have an influence on loading timeframes.

6. **Tailings disposal and rehabilitation of mined areas.** The tailings (ferrous and non-ferrous sand, silts and clays) which are separated from the exportable product are pumped as a slurry to tailings disposal areas. The discharged slurry dewateres by gravity, with the drainage water collected and directed into a settlement pond or ponds. Once the tailings have dewatered, mechanical plant (excavators and dozers) redistribute the material to form the grade and levels required by the rehabilitation plan for that area. Following this the land may be stabilised, top soiled and replanted.

To operate the mine, the process requires the abstraction of water from the Wainui Stream via a constructed dam incorporating a fish pass, and the discharge of stormwater to the Wainui Stream and the discharge of process water to settling ponds. Excess stormwater and process water is discharged to the CMA via the ship loading pipelines.

The activities sought to be authorised as part of the Northern Block Mining Project include (but are not limited to):

- (a) vegetation, topsoil and overburden removal, and excavation and processing of iron sand above and below the water table (as above);
- (b) the transportation of that product via temporary pipelines to the established processing plant on the Central and Southern Block;
- (c) processing (as above);
- (d) discharge of process water to land; and
- (e) tailing disposal and rehabilitation of mined areas (as above).

The Northern Block Mining Project will rely on / be supported by the processing infrastructure located on the Central and Southern Blocks. It will also rely on / be supported by the consents being sought for the Central and Southern Block to take and use water from the Wainui Stream, discharge of stormwater to the Wainui Stream and the CMA, discharge of process water to the CMA and transport of processed product from the processing facility through the ship-loading pipelines to the CMA. No changes are being proposed to the existing water take limits and discharge limits to facilitate mining of the Northern Block.

3 Approvals sought

3.1 Resource Management Act 1991

A summary of the resource consents that are required for the Northern, Central and Southern Blocks is set out below.

3.1.1 Resource consents required for the Northern Block

National Environmental Standard for Freshwater 2020 – consents to clear vegetation and undertake earthworks within and within 10m of a natural inland wetland. Consents are also required to take, use, dam, or divert water within and within 100 m of a natural inland wetland and to discharge water within and within 100 m of a natural inland wetland.

National Environmental Standard for Commercial Forestry 2017 – consent to harvest pine trees within Class 8e land.

Operative Waikato Regional Plan – consents for soil disturbance and vegetation clearance activities, diversion and taking of groundwater and surface of water associated with mining above and below the water table, discharge of a contaminant to land or water (process water and placement of tailings) and for overburden disposal to land.

Additionally, resource consent is required under the Operative Waitomo District Plan for the potential disturbance of archaeological sites recorded in the Plan - this consent applies to the Northern Block only given that mining has occurred since the early 1970's on the Central and Southern Blocks.

3.1.2 Resource consents required for the Central and Southern Blocks

The resource consents set out above are also required for the Central and Southern Blocks.² In addition, the following resource consents are required for the Central and Southern Blocks Project:

Operative Waikato Regional Plan – consents for the damming, diversion and taking of surface water and groundwater, for stream bed disturbance, and for the discharge of stormwater to surface water.

Operative and Proposed Waikato Regional Coastal Plans – consents for the use and occupation of the Coastal Marine Area by the export pipelines and the SBM, for discharges to and depositions in the CMA from shiploading activities, and for the discharge of stormwater from the export pipelines.

3.2 Wildlife Act 1953

A wildlife permit will be required to manage lizards if they are identified prior to vegetation removal or ground disturbance works.

3.3 Heritage New Zealand Pouhere Taonga Act 2014

Archaeological authorities will be sought due to the potential for currently undiscovered archaeological features to be disturbed by mining activities (excluding urupa and archaeological areas reserved from mining which will not be disturbed).

4 Benefits of the Projects

The continuation of the mining activity on the Taharoa C Block that will be facilitated by the approvals sought under the FTAA will generate significant regional and national benefits. The Central and Southern Block Mining Project and Northern Block Project will directly contribute billions to the New Zealand economy (through employment, income for landowners, business for regional supplies and the payment of taxes).

The mine provides significant employment opportunities for the community, particularly local Māori. Over 82% of income earned by local Ngāti Mahuta comes from employment at the mine. TIL has a core workforce of 170-80 people but employs upwards of 300 staff and contractors.

TIL relies on locally sourced goods and services including the supply of electricity and services from surrounding areas including Kawhia, Te Kuiti, Otorohanga, Te Awamutu and Hamilton. TIL also relies on specialist sub-contractor support including the maintenance and management of specialised mine machinery and equipment. The support TIL relies on (and will continue to rely on) from

² Excluding the resource consent required for archaeological site disturbance.

surrounding centres for the Northern Block Project and Central and Southern Block Mining Project will inject billions into the local economy over the life of the consents sought for the Project.

The mine also provides essential benefits to the local Taharoa Village which was established around the mine and exists today because of the substantial financial contribution the mine makes every year.

5 Summary of potential adverse effects on the environment

The following high-level summary of effects on the environment is based on technical assessments previously completed in relation to mining of the Central and Southern blocks. These assessments are currently being updated, and additional assessments are being completed for mining of the Northern Block. A full assessment of effects supported by technical assessments will be included in the applications for the Northern and Central/Southern Blocks respectively.

5.1 Effects common to the Northern, Central and Southern Blocks

5.1.1 Effects on terrestrial ecology (including bats, birds, lizards)

Disturbance from mining activities has the potential to have adverse effects on wetland and grassland bird species. The loss of existing grassland due to the mining activity may also result in potential injury or death of various threatened native skink present in low numbers in the grassland. The overall level of effect on terrestrial ecology has been assessed as being **low** with the provision of an over-arching Environmental Management Plan (EMP), including an Avifauna Management Plan, Bat Management Plan and a Lizard Management Plan, and imposition of appropriate conditions such as a requirement for there to be a 30 m planting buffer around all natural water bodies. Subject to the imposition of conditions, the overall level of effects on terrestrial ecology has been assessed as **minor**.

5.1.2 Effects of mining below the water table

When mining activity interacts with groundwater there may be the potential for adverse effects on surface freshwater bodies if there is a hydraulic connection between the groundwater and surface water. This connection will be carefully monitored. Any adverse effects on the primary freshwater bodies on the site (the Mitiwai Stream and the Wainui Stream) can be avoided and mitigated through consent conditions including for example, requirements to maintain a minimum flow within the streams.

5.1.3 Effects of discharge to land

The discharge of tailings and surplus process water to land has the potential to cause adverse effects on landform, groundwater and nearby waterways. The tailings material is re-formed as close as practicable to the original landform. The discharge of surplus process water does not result in contamination of groundwater due to the natural filtering provided by the sandy ground conditions. Overall, the adverse effects of discharges to land have been assessed as **less than minor**.

5.1.4 Land disturbance effects

The mining operation is located in a high-risk erosion area and the mining and stockpiling of iron sand has the potential to result in adverse effects on land stability. Given that the mine has a good operational history with no erosion issues requiring mitigation, a rehabilitation process and

revegetation plan is followed for disturbed areas, and perennial waterbody mining setbacks are imposed, any adverse effects can be considered **negligible**.

5.1.5 Archaeological effects

Taharoa C Block is and has always been Māori land which means that there is elevated potential for accidental discovery of koi iwi and other taonga in the dune environment of the area. Ngāti Mahuta derived tikanga and protocols apply when discoveries of koiwi and taonga occur in the Taharoa dune environment as a result of mining activity, and that tikanga/protocol is reflected in existing and proposed consent conditions. Defined urupā are located within the dune system where accidentally discovered koiwi are interred with appropriate tikanga being observed. A buffer in which no mining occurs is observed around each urupā.

All of these measures and practices will continue and mitigate the potential adverse effects in relation to archaeology to **less than minor** levels.

5.1.6 Cultural effects

In considering cultural effects, it is important to note the cultural benefits the ongoing operation of the mine has for Ngati Mahuta as tangata whenua. These benefits include employment benefits, royalties, and support for the local community. Ngati Mahuta, though the Taharoa C Block Incorporation, own the land on which the mine operates and is paid significant royalties from the mine. The mine also supports the employment and growth of Ngati Mahuta whanau. The local employment opportunity generated by the mine has allowed the local community to retain members of the community who may have otherwise moved away to seek employment elsewhere and lost their connection to the land.

TIL understand the views of the respective Taharoa Marae and Te Runanga in relation to the potential cultural effects of the Central and Southern Block Project. In summary, at a high-level:

The damming of the Wainui Stream has the potential to have adverse effects on the health of Lake Taharoa and its indigenous fishery, an important matter to Ngāti Mahuta. The maintenance of the effectiveness of the fish pass at the dam in the Wainui Stream is important to ensure the presence of indigenous fish species in the stream and lake upstream of the dam continues.

The maintenance and monitoring of baseflow in the Mitiwai Stream is also an important matter from a cultural perspective. TIL has engaged expert consultants to monitor the stream to ensure that TIL understands the potential effects of its mining activity on the Stream, which will be managed through consent conditions. Rehabilitation of the mine site to a sustainable landform and land cover is also an important matter to Ngāti Mahuta. Representatives of Ngāti Mahuta have shared their desire for the land to be returned to its natural state following mining activity (being rolling sand dunes with some pockets of vegetation). In that regard, TIL has developed and is implementing an overall Site Rehabilitation Plan and updated Conceptual Site Closure Plan in place to be implemented in the event that the mine closes in the future.

TIL propose to consult with the respective Taharoa Marae and Te Runanga in the preparation of the various management plans that govern the management of effects at the mine. Such consultation and engagement benefits both parties – TIL will gain the benefit of access to the skills and expertise that reside within the marae and hapu whanau, while marae and hapu whanau will have the opportunity to influence the content of management plans that will play an important part in managing the ongoing effects of the mining activity. TIL will also propose the provision of a website

which includes monthly monitoring records to communicate data to mana whenua and the community.

5.1.7 Air Quality Effects

The mine is located in an isolated location subject to extreme westerly winds. In this environment, there is potential for wind-blown sand from the mine site to generate adverse effects on adjoining and adjacent sites to the mine, including in Taharoa Village. TIL implement a range of avoidance and mitigation techniques to control such emissions including the erection of fencing to trap sand particles, placing ground cover (for example, coconut matting) on exposed areas, using mobile and automated fixed watering systems on internal site roads, enforcing vehicle speed limits, and progressively rehabilitating mined out areas. These measures mean that the mine site can operate in accordance with the relevant permitted activity rule of the Waikato Regional Plan with regards to air quality. TIL proposes to implement a Dust Management Plan to manage the implementation of these dust prevention mechanisms. Although there remains the potential for off-site discharges of dust due to the coastal environment, these discharges are highly unlikely to result in adverse effects to human health. Acoustic Effects

The mining activities have the potential to have adverse noise effects on key sensitive receptors on sites adjoining the Northern Block (1891 Taharoa Road, 1891A Taharoa Road, Te Kōraha Marae and 25 Rotopuhoe Road). However, these receptors are located several hundred metres from where mining will occur on the Northern Block and given this separation distance, it is expected that the works will be able to be managed to comply with the Waitomo District Plan daytime and nighttime noise limits. As a result, any potential adverse effects from noise from mining on the Northern Block on sensitive receivers is expected to be **less than minor**.

Mining on the Central and Southern Blocks has been continuous since the 1970s and benefits from existing use rights with respect to noise levels and associated acoustic effects. Notwithstanding this, noise levels are expected to be compliant with District Plan noise limits. TIL will continue to adopt the best practicable option to ensure that the emission of noise from these blocks does not exceed a reasonable level for any nearby sensitive receptors.

5.2 Effects relating to the Central and Southern Blocks only

5.2.1 Effects of damming Wainui Stream

Authorisation of the dam in the Wainui Stream will result in a similar water regime to what is currently present. Fish passage will be provided for via the monitoring and maintenance of a fish pass which achieves the intended purpose of allowing grey mullet and other targeted species to be able to navigate upstream to Lake Taharoa. The downstream migration of juvenile native fish can be adequately addressed through consent conditions which include the retention of a minimum flow within the fish pass and downstream of the dam, as well as monitoring of fish pass performance. As a result, the effects of the dam on fish passage has been assessed as **negligible**.

5.2.2 Effects on water quantity

Water is extracted from the impounded section of the Wainui Stream for mining and shiploading processes. Separate water take consents are held for the mining and shiploading takes and the consents cannot be exercised at the same time. The mine is currently operating within the historically consented limits for water abstraction and no further water quantity is required for the continued operation of the mine. The Wainui Stream catchment is not over-allocated and there are

no permits held by any other party to take water from the stream. As a result, adverse water quantity effects are avoided.

5.2.3 Effects of water take on marginal wetlands

The proposed water takes have the potential to have adverse effects on marginal wetlands around the edges of Lake Taharoa. Noting that the wetlands have acclimated to the lake levels that have been experienced since the installation of the dam in the Wainui Stream in the early 1970's, the magnitude of these effects has been assessed as **low** given that the water takes will be operated in a similar manner to what has been historically occurred at the mine. Importantly, TIL is proposing to retain existing conditions that require water takes to cease if the lake levels reach a certain minimum point. Conditions will also be proposed that require ongoing monitoring of the lake margin wetlands and management responses to be implemented if the lake level remains low for an extended period and the wetlands show signs of stress (other than that caused by natural seasonal conditions).

5.2.4 Effects on benthic fauna

The proposed ship-loading infrastructure including pipelines on the seabed and the tethering mechanism for the SBM will continue to occupy part of the seabed and impact on a small amount of available subtidal sandflat habitat. Given the small percentage of the available subtidal sandflat habitat this represents, this is assessed as having a low magnitude of effect on benthic ecology. The effects of constructing the pipeline have also been assessed as being **low**.

5.2.5 Effects on fish and seafood species

The discharge from the ship loading process has the potential to have adverse effects on existing habitat for fish and seafood species. Given the relatively infrequent and short-term nature of the discharge and the highly mobile nature of fish species the potential adverse effects are assessed as **negligible**. The presence of green lipped mussels in the area of the discharge indicates that ongoing ship loading discharges do not inhibit mussel colonisation and has a **negligible** effect on seafood resource species.

5.2.6 Effects on marine mammals

A number of marine mammal species can be present in the wider marine area around Port Taharoa such as Māui dolphins, common dolphins, southern right whales and Orca/killer whales. Given the low level of risk posed by the ship loading operation and the fact that it has been occurring in the vicinity since the early 1970's, the overall risk of adverse effects for marine mammals is assessed as **negligible**. Nevertheless, to recognise the sensitivity of the marine mammals that traverse the area, TIL propose conditions that require an underwater noise survey to be undertaken if 35 ship visits occur in a 12 month period, in order to inform best practice underwater noise measures.

5.2.7 Effects on coastal processes

TIL seeks to continue the ability to discharge up to 75,000m³ per day of ship loading water, including freshwater and fine sediment, up to a maximum of 7,500,000m³ per year. As a result of dilution and dispersion of the sediment plume provided by oceanic conditions, the effect of this discharge on coastal processes has been assessed as being **less than minor**.

5.2.8 Effects of discharges in the Coastal Marine Area (CMA)

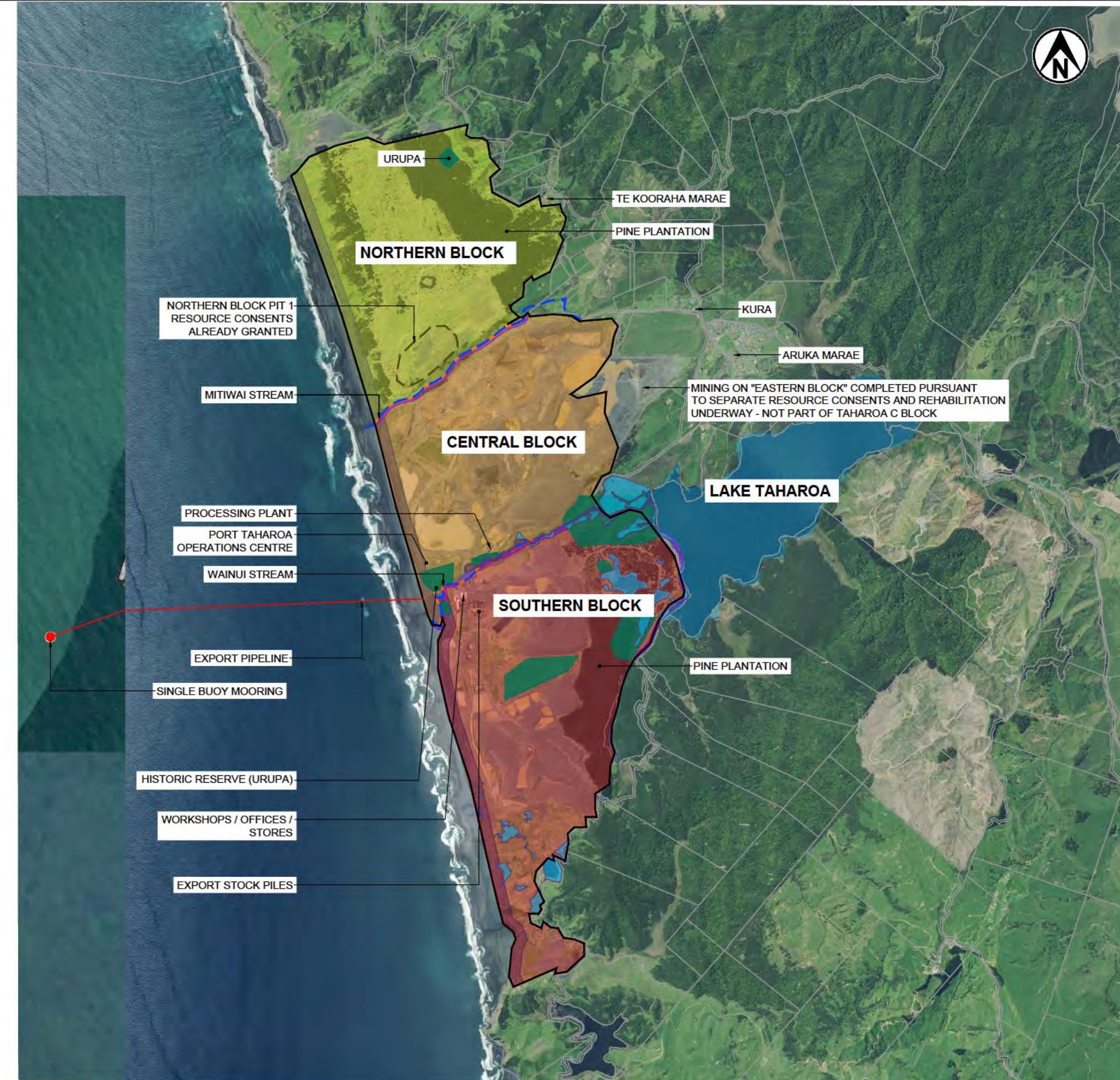
The potential adverse effects of the sediment discharge from the ship-loading events have been addressed above. The discharge includes some trace levels of naturally occurring contaminants in the ironsand that is pumped in slurry form into the ship. Because of the extremely low levels of the naturally occurring contaminants, and the dilution provided by the sea water, the discharge will not result in any measurable toxicity effect on benthic fauna.

TIL is seeking consent to continue to discharge excess process water and stormwater to the CMA at a rate of 32,000m³/day. This discharge occurs infrequently and when there is no suitable alternative to provide for the discharge on land - primarily at times of prolonged heavy rainfall. The potential ecological effects from the process water/stormwater discharge are likely to be even less than those of the ship loading discharge which were assessed to be less than minor. Correspondingly, no further actions to avoid, remedy or mitigate potential effects from the process wastewater and stormwater discharges are required apart from monitoring of the discharge quality and composition.

5.2.9 Effects on navigation safety

The continued ship movements to and from the Port of Taharoa and the occupation of the CMA by ship loading infrastructure have the potential to have adverse effects on navigational safety of other users of the CMA. However, the use of this area for recreational watercraft and commercial vessels is infrequent and the movement of ironsand export ships has been established in the area since the early 1970's. No more than one ship can access the mooring buoy at one time. Furthermore, the Port of Taharoa is operated in compliance with the New Zealand Port and Harbour Marine Safety Code, the Harbourmaster previously had no objection to the continued activity and several improvements have been implemented since the granting of the now expired resource consents in 2002. For these reasons, potential adverse effects on navigation safety have been assessed as **less than minor**.

LEGEND	
	STREAM
	PROPERTY BOUNDARIES
	MINING LICENCE AREA (TAHAROA C BLOCK)
	NORTHERN BLOCK
	CENTRAL BLOCK
	SOUTHERN BLOCK
	30m PERENNIAL WATER BODY / STREAM SETBACK
	100m MHWS SETBACK SUBJECT TO SURVEY
	ARCHEOLOGICAL AREAS RESERVED FROM MINING
	WETLAND



Holly-Marie Rearic

From: Grant Eccles [REDACTED]
Sent: Tuesday, 27 May 2025 3:05 pm
To: [REDACTED]
Subject: Taharoa Ironsands Ltd - Applications under Fast Track Approvals Act 2024
Attachments: Consultation letter to the HarbourMaster dated 21 May 2025.pdf

Hi David

Please see attached letter regarding applications by Taharoa Ironsands Ltd under the Fast Track Approvals Act 2024.

Please feel free to contact me on my mobile [REDACTED] if I can clarify anything further.

If you have any written feedback please feel free to respond to me directly at this email address.

Best Regards

Grant Eccles | Technical Director - Planning

BREP, MNZPI

Tonkin + Taylor

Level 5, 711 Victoria Street, Hamilton 3204 | PO Box 9544, Hamilton, New Zealand

[REDACTED] www.tonkintaylor.co.nz  T+T profile



To send me large files you can use my [file drop](#)



Taharoa Ironsands Ltd

21 May 2025

BY EMAIL: [REDACTED]

David Vicente
HarbourMaster
Maritime New Zealand
PO Box 6091
New Plymouth 4344

Dear David

Taharoa Ironsands Limited – Fast-track Approvals Act 2024 applications

1. As you know, Taharoa Ironsands Limited (**TIL**) owns and operates the Taharoa Ironsand Mine which has been in operation since 1973.
2. TIL needs to replace its resource consents relating to the Central and Southern Blocks to continue operating the existing Mine and to enable expansion of the Mine in the future. TIL sought to do so by making an application in 2020 under the standard resource consenting process under the Resource Management Act 1991 (**RMA**). TIL engaged with Mr Jon Peters, in his role as HarbourMaster, when it prepared that application. The consenting process under the RMA was lengthy and TIL was not satisfied with the decision, which led it to appeal the decision to the Environment Court on 12 December 2024. This appeal remains unresolved.
3. Since the appeal was filed, the Fast-track Approvals Act 2024 (**FTAA**) has been enacted and the reconsenting of the Central and Southern Blocks of the Mine has been recognised by the Government as a project with regional and national benefits. The project has been directly referred to utilise the Fast-Track approval process. The FTAA therefore provides an alternative, and suitable, consenting pathway for TIL to pursue the necessary resource consents for the Central and Southern Blocks (including the consents for the mooring buoy, pipelines and activities in the coastal marine area). New mining of the Northern Block (and the necessary land-based consents for this activity) has also been directly referred by the Government to utilise the Fast-track process on account of its regional and national significance.
4. We are now preparing our substantive applications for both projects which will be considered under the FTAA. We are intending to file the applications with the Environmental Protection Agency in June/July 2025. Enviser is managing the preparation of the applications on behalf of TIL with input from a range of technical consultants, including Grant Eccles (planner) of Tonkin & Taylor Limited. Tonkin & Taylor has provided a high-level summary of what will be sought in each application in **Appendix A**.
5. Mr Peters previously indicated that he had no concerns or objections to TIL's operation in respect to the application under the RMA for the Central and Southern Blocks. However, we would appreciate an opportunity to discuss the applications with you or for you to otherwise provide feedback on the FTAA applications.

6. If you would like to discuss the applications or provide written feedback, please let Grant Eccles know using the following email address: [REDACTED]

Yours faithfully



Wayne Coffey
Managing Director and CEO of Taharoa Ironsands Limited

Appendix A

Taharoa Ironsands Mine – Project summary for pre-application consultation

- **Northern Block Mining Project**
- **Central and Southern Block Mining Project**

1 Overview

Taharoa Ironsands Limited (TIL) operate an iron sand mine at Taharoa, on the West Coast of the North Island, approximately 8 km south of Kawhia Harbour. The Taharoa Mine has been in operation since 1973 (owned by New Zealand Steel until 2017). The mine site covers an area of approximately 1,300 hectares, primarily on Māori land legally described as the Taharoa C Block and the part of the coastal marine area (CMA) legally defined as Port Taharoa (**mine**).

For the purposes of mining activity, Taharoa C Block is divided into blocks. As shown on the attached plan:

- (a) the area of the site to the north of the Mitiwai Stream is known as the Northern Block.
- (b) the area of the site between the Mitiwai Stream and the Wainui Stream is known as the Central Block; and
- (c) the area of the site to the south of the Wainui Stream is known as the Southern Block.

The Central and Southern Blocks are currently operated under a suite of resource consents granted in 2006.¹ Mining activity has not historically occurred in the Northern Block.

TIL is now preparing applications for the necessary resource consents, wildlife permits and archaeological authorities under the Fast-track Approvals Act 2024 (FTAA) to authorise:

- the extraction of sand (and associated activities) on the Northern Block (known as the Northern Block Mining Project); and
- the continuation of sand extraction (and associated activities which support the entire mine, including its export operation) on the Central and Southern Blocks and in the CMA (known as the Central and Southern Block Mining Project).

The following describes the proposed mining and associated works which are subject to the applications, details the resource consents and approvals sought and provides a high-level summary of the potential effects on the environment of each project at this stage. As the applications are currently being prepared, this information is based on the work completed as of 01 May 2025, and is subject to change.

¹ TIL also hold separate resource consents for mining of (i) the “Eastern Block” granted in 2018 (mining now completed and rehabilitation underway), and (ii) the “Te Mania Extension” adjoining the Eastern Block granted in 2022 (mining yet to commence), and (iii) a small area in the Northern Block known as “Pit 1” granted in late 2024 (mining currently in progress). Mining at these locations relies on the water take resource consents and the coastal permits granted for the Central and Southern Blocks.

2 Description of proposed works

TIL propose to mine ironsand throughout the Northern, Central and Southern Blocks excluding areas where mining restrictions will apply. The areas where mining activity will not take place are within 100 m of Mean High Water Springs, 30 m of perennial water bodies (Mitiwai Stream, Wainui Stream and Lake Taharoa), and within already identified urupa and archaeological re-interment areas on the mine. Other mining exclusion areas may be identified as part of the completion of technical assessments that are currently underway. Any additional mining exclusion areas that are identified by the technical assessments will be included in the substantive FTAA applications.

Whilst the process to extract, process and export the ironsand can and does vary depending on the nature of the deposit being mined at the time, it follows the same broad steps. These activities, which are sought to be authorised as part of the Central and Southern Block Project, include:

1. **Vegetation, topsoil and overburden removal, including harvesting of trees with commercial value (pines).** Useful native species are removed prior to stripping of topsoil for use in the eco-sourced nursery on site. Topsoil is stockpiled on-site for use in future rehabilitation activities.
2. **Extraction and processing of Ironsand.** Raw Ironsand is extracted using various methods and equipment depending on ground conditions. In upper layers, standard earthmoving machinery such as excavators, bulldozers, and trucks are used to collect the ironsand and deposit it into a Dry Mining Unit (DMU). The DMU mixes the ironsand with water to form a slurry, which is then pumped to a treatment plant for titanomagnetite extraction.
3. During this process, groundwater and surface water may enter the active excavation area. To maintain dry working conditions, this water may be pumped out as required. However, as mining progresses to deeper layers, maintaining a dry pit may become impractical. In such cases, a cutter-suction dredge is used in a water-filled pond. The dredge floats on the water and uses a submerged dredge head to cut, fluidise, and pump the Ironsand slurry through a pipeline to the treatment plant. The dredge is capable of operating at depths of 8 to 15 meters below the pond surface. In some instances, a long-reach excavator may also be used to extract material from within the pond.
4. **Processing.** The extracted ironsand is transported to a centralised processing plant where it is concentrated and processed. The ironsand is refined using screening and gravity separation. The ironsand is mixed into a slurry and pumped through a seabed pipeline to a bulk carrier ship moored at the Port of Taharoa. The export pipelines run from the processing and storage facility located on land to a Single Buoy Mooring (SBM), located approximately 3.5 km offshore.
5. **Ship loading and dewatering.** Bulk carrier ships moor at the SBM to receive the ironsand in slurry form from the export pipelines. Each ship contains dewatering equipment and the resulting freshwater, containing residual fine suspended material (inert, inorganic geological material) that is removed from the ironsand slurry, is discharged from the ship to the sea. The discharge forms a buoyant plume that floats on the seawater surface before dispersal and dilution. Ship loading operations are currently undertaken approximately 20 times per year and will increase in frequency in future as production increases up to a projected maximum of 35 times per year. Each ship loading activity takes approximately 90 hours (of pumping time) however weather conditions have an influence on loading timeframes.

6. **Tailings disposal and rehabilitation of mined areas.** The tailings (ferrous and non-ferrous sand, silts and clays) which are separated from the exportable product are pumped as a slurry to tailings disposal areas. The discharged slurry dewateres by gravity, with the drainage water collected and directed into a settlement pond or ponds. Once the tailings have dewatered, mechanical plant (excavators and dozers) redistribute the material to form the grade and levels required by the rehabilitation plan for that area. Following this the land may be stabilised, top soiled and replanted.

To operate the mine, the process requires the abstraction of water from the Wainui Stream via a constructed dam incorporating a fish pass, and the discharge of stormwater to the Wainui Stream and the discharge of process water to settling ponds. Excess stormwater and process water is discharged to the CMA via the ship loading pipelines.

The activities sought to be authorised as part of the Northern Block Mining Project include (but are not limited to):

- (a) vegetation, topsoil and overburden removal, and excavation and processing of iron sand above and below the water table (as above);
- (b) the transportation of that product via temporary pipelines to the established processing plant on the Central and Southern Block;
- (c) processing (as above);
- (d) discharge of process water to land; and
- (e) tailing disposal and rehabilitation of mined areas (as above).

The Northern Block Mining Project will rely on / be supported by the processing infrastructure located on the Central and Southern Blocks. It will also rely on / be supported by the consents being sought for the Central and Southern Block to take and use water from the Wainui Stream, discharge of stormwater to the Wainui Stream and the CMA, discharge of process water to the CMA and transport of processed product from the processing facility through the ship-loading pipelines to the CMA. No changes are being proposed to the existing water take limits and discharge limits to facilitate mining of the Northern Block.

3 Approvals sought

3.1 Resource Management Act 1991

A summary of the resource consents that are required for the Northern, Central and Southern Blocks is set out below.

3.1.1 Resource consents required for the Northern Block

National Environmental Standard for Freshwater 2020 – consents to clear vegetation and undertake earthworks within and within 10m of a natural inland wetland. Consents are also required to take, use, dam, or divert water within and within 100 m of a natural inland wetland and to discharge water within and within 100 m of a natural inland wetland.

National Environmental Standard for Commercial Forestry 2017 – consent to harvest pine trees within Class 8e land.

Operative Waikato Regional Plan – consents for soil disturbance and vegetation clearance activities, diversion and taking of groundwater and surface of water associated with mining above and below the water table, discharge of a contaminant to land or water (process water and placement of tailings) and for overburden disposal to land.

Additionally, resource consent is required under the Operative Waitomo District Plan for the potential disturbance of archaeological sites recorded in the Plan - this consent applies to the Northern Block only given that mining has occurred since the early 1970's on the Central and Southern Blocks.

3.1.2 Resource consents required for the Central and Southern Blocks

The resource consents set out above are also required for the Central and Southern Blocks.² In addition, the following resource consents are required for the Central and Southern Blocks Project:

Operative Waikato Regional Plan – consents for the damming, diversion and taking of surface water and groundwater, for stream bed disturbance, and for the discharge of stormwater to surface water.

Operative and Proposed Waikato Regional Coastal Plans – consents for the use and occupation of the Coastal Marine Area by the export pipelines and the SBM, for discharges to and depositions in the CMA from shiploading activities, and for the discharge of stormwater from the export pipelines.

3.2 Wildlife Act 1953

A wildlife permit will be required to manage lizards if they are identified prior to vegetation removal or ground disturbance works.

3.3 Heritage New Zealand Pouhere Taonga Act 2014

Archaeological authorities will be sought due to the potential for currently undiscovered archaeological features to be disturbed by mining activities (excluding urupa and archaeological areas reserved from mining which will not be disturbed).

4 Benefits of the Projects

The continuation of the mining activity on the Taharoa C Block that will be facilitated by the approvals sought under the FTAA will generate significant regional and national benefits. The Central and Southern Block Mining Project and Northern Block Project will directly contribute billions to the New Zealand economy (through employment, income for landowners, business for regional supplies and the payment of taxes).

The mine provides significant employment opportunities for the community, particularly local Māori. Over 82% of income earned by local Ngāti Mahuta comes from employment at the mine. TIL has a core workforce of 170-80 people but employs upwards of 300 staff and contractors.

TIL relies on locally sourced goods and services including the supply of electricity and services from surrounding areas including Kawhia, Te Kuiti, Otorohanga, Te Awamutu and Hamilton. TIL also relies on specialist sub-contractor support including the maintenance and management of specialised mine machinery and equipment. The support TIL relies on (and will continue to rely on) from

² Excluding the resource consent required for archaeological site disturbance.

surrounding centres for the Northern Block Project and Central and Southern Block Mining Project will inject billions into the local economy over the life of the consents sought for the Project.

The mine also provides essential benefits to the local Taharoa Village which was established around the mine and exists today because of the substantial financial contribution the mine makes every year.

5 Summary of potential adverse effects on the environment

The following high-level summary of effects on the environment is based on technical assessments previously completed in relation to mining of the Central and Southern blocks. These assessments are currently being updated, and additional assessments are being completed for mining of the Northern Block. A full assessment of effects supported by technical assessments will be included in the applications for the Northern and Central/Southern Blocks respectively.

5.1 Effects common to the Northern, Central and Southern Blocks

5.1.1 Effects on terrestrial ecology (including bats, birds, lizards)

Disturbance from mining activities has the potential to have adverse effects on wetland and grassland bird species. The loss of existing grassland due to the mining activity may also result in potential injury or death of various threatened native skink present in low numbers in the grassland. The overall level of effect on terrestrial ecology has been assessed as being **low** with the provision of an over-arching Environmental Management Plan (EMP), including an Avifauna Management Plan, Bat Management Plan and a Lizard Management Plan, and imposition of appropriate conditions such as a requirement for there to be a 30 m planting buffer around all natural water bodies. Subject to the imposition of conditions, the overall level of effects on terrestrial ecology has been assessed as **minor**.

5.1.2 Effects of mining below the water table

When mining activity interacts with groundwater there may be the potential for adverse effects on surface freshwater bodies if there is a hydraulic connection between the groundwater and surface water. This connection will be carefully monitored. Any adverse effects on the primary freshwater bodies on the site (the Mitiwai Stream and the Wainui Stream) can be avoided and mitigated through consent conditions including for example, requirements to maintain a minimum flow within the streams.

5.1.3 Effects of discharge to land

The discharge of tailings and surplus process water to land has the potential to cause adverse effects on landform, groundwater and nearby waterways. The tailings material is re-formed as close as practicable to the original landform. The discharge of surplus process water does not result in contamination of groundwater due to the natural filtering provided by the sandy ground conditions. Overall, the adverse effects of discharges to land have been assessed as **less than minor**.

5.1.4 Land disturbance effects

The mining operation is located in a high-risk erosion area and the mining and stockpiling of iron sand has the potential to result in adverse effects on land stability. Given that the mine has a good operational history with no erosion issues requiring mitigation, a rehabilitation process and

revegetation plan is followed for disturbed areas, and perennial waterbody mining setbacks are imposed, any adverse effects can be considered **negligible**.

5.1.5 Archaeological effects

Taharoa C Block is and has always been Māori land which means that there is elevated potential for accidental discovery of koi iwi and other taonga in the dune environment of the area. Ngāti Mahuta derived tikanga and protocols apply when discoveries of koiwi and taonga occur in the Taharoa dune environment as a result of mining activity, and that tikanga/protocol is reflected in existing and proposed consent conditions. Defined urupā are located within the dune system where accidentally discovered koiwi are interred with appropriate tikanga being observed. A buffer in which no mining occurs is observed around each urupā.

All of these measures and practices will continue and mitigate the potential adverse effects in relation to archaeology to **less than minor** levels.

5.1.6 Cultural effects

In considering cultural effects, it is important to note the cultural benefits the ongoing operation of the mine has for Ngati Mahuta as tangata whenua. These benefits include employment benefits, royalties, and support for the local community. Ngati Mahuta, though the Taharoa C Block Incorporation, own the land on which the mine operates and is paid significant royalties from the mine. The mine also supports the employment and growth of Ngati Mahuta whanau. The local employment opportunity generated by the mine has allowed the local community to retain members of the community who may have otherwise moved away to seek employment elsewhere and lost their connection to the land.

TIL understand the views of the respective Taharoa Marae and Te Runanga in relation to the potential cultural effects of the Central and Southern Block Project. In summary, at a high-level:

The damming of the Wainui Stream has the potential to have adverse effects on the health of Lake Taharoa and its indigenous fishery, an important matter to Ngāti Mahuta. The maintenance of the effectiveness of the fish pass at the dam in the Wainui Stream is important to ensure the presence of indigenous fish species in the stream and lake upstream of the dam continues.

The maintenance and monitoring of baseflow in the Mitiwai Stream is also an important matter from a cultural perspective. TIL has engaged expert consultants to monitor the stream to ensure that TIL understands the potential effects of its mining activity on the Stream, which will be managed through consent conditions. Rehabilitation of the mine site to a sustainable landform and land cover is also an important matter to Ngāti Mahuta. Representatives of Ngāti Mahuta have shared their desire for the land to be returned to its natural state following mining activity (being rolling sand dunes with some pockets of vegetation). In that regard, TIL has developed and is implementing an overall Site Rehabilitation Plan and updated Conceptual Site Closure Plan in place to be implemented in the event that the mine closes in the future.

TIL propose to consult with the respective Taharoa Marae and Te Runanga in the preparation of the various management plans that govern the management of effects at the mine. Such consultation and engagement benefits both parties – TIL will gain the benefit of access to the skills and expertise that reside within the marae and hapu whanau, while marae and hapu whanau will have the opportunity to influence the content of management plans that will play an important part in managing the ongoing effects of the mining activity. TIL will also propose the provision of a website

which includes monthly monitoring records to communicate data to mana whenua and the community.

5.1.7 Air Quality Effects

The mine is located in an isolated location subject to extreme westerly winds. In this environment, there is potential for wind-blown sand from the mine site to generate adverse effects on adjoining and adjacent sites to the mine, including in Taharoa Village. TIL implement a range of avoidance and mitigation techniques to control such emissions including the erection of fencing to trap sand particles, placing ground cover (for example, coconut matting) on exposed areas, using mobile and automated fixed watering systems on internal site roads, enforcing vehicle speed limits, and progressively rehabilitating mined out areas. These measures mean that the mine site can operate in accordance with the relevant permitted activity rule of the Waikato Regional Plan with regards to air quality. TIL proposes to implement a Dust Management Plan to manage the implementation of these dust prevention mechanisms. Although there remains the potential for off-site discharges of dust due to the coastal environment, these discharges are highly unlikely to result in adverse effects to human health. Acoustic Effects

The mining activities have the potential to have adverse noise effects on key sensitive receptors on sites adjoining the Northern Block (1891 Taharoa Road, 1891A Taharoa Road, Te Kōraha Marae and 25 Rotopuhoe Road). However, these receptors are located several hundred metres from where mining will occur on the Northern Block and given this separation distance, it is expected that the works will be able to be managed to comply with the Waitomo District Plan daytime and nighttime noise limits. As a result, any potential adverse effects from noise from mining on the Northern Block on sensitive receivers is expected to be **less than minor**.

Mining on the Central and Southern Blocks has been continuous since the 1970s and benefits from existing use rights with respect to noise levels and associated acoustic effects. Notwithstanding this, noise levels are expected to be compliant with District Plan noise limits. TIL will continue to adopt the best practicable option to ensure that the emission of noise from these blocks does not exceed a reasonable level for any nearby sensitive receptors.

5.2 Effects relating to the Central and Southern Blocks only

5.2.1 Effects of damming Wainui Stream

Authorisation of the dam in the Wainui Stream will result in a similar water regime to what is currently present. Fish passage will be provided for via the monitoring and maintenance of a fish pass which achieves the intended purpose of allowing grey mullet and other targeted species to be able to navigate upstream to Lake Taharoa. The downstream migration of juvenile native fish can be adequately addressed through consent conditions which include the retention of a minimum flow within the fish pass and downstream of the dam, as well as monitoring of fish pass performance. As a result, the effects of the dam on fish passage has been assessed as **negligible**.

5.2.2 Effects on water quantity

Water is extracted from the impounded section of the Wainui Stream for mining and shiploading processes. Separate water take consents are held for the mining and shiploading takes and the consents cannot be exercised at the same time. The mine is currently operating within the historically consented limits for water abstraction and no further water quantity is required for the continued operation of the mine. The Wainui Stream catchment is not over-allocated and there are

no permits held by any other party to take water from the stream. As a result, adverse water quantity effects are avoided.

5.2.3 Effects of water take on marginal wetlands

The proposed water takes have the potential to have adverse effects on marginal wetlands around the edges of Lake Taharoa. Noting that the wetlands have acclimated to the lake levels that have been experienced since the installation of the dam in the Wainui Stream in the early 1970's, the magnitude of these effects has been assessed as **low** given that the water takes will be operated in a similar manner to what has been historically occurred at the mine. Importantly, TIL is proposing to retain existing conditions that require water takes to cease if the lake levels reach a certain minimum point. Conditions will also be proposed that require ongoing monitoring of the lake margin wetlands and management responses to be implemented if the lake level remains low for an extended period and the wetlands show signs of stress (other than that caused by natural seasonal conditions).

5.2.4 Effects on benthic fauna

The proposed ship-loading infrastructure including pipelines on the seabed and the tethering mechanism for the SBM will continue to occupy part of the seabed and impact on a small amount of available subtidal sandflat habitat. Given the small percentage of the available subtidal sandflat habitat this represents, this is assessed as having a low magnitude of effect on benthic ecology. The effects of constructing the pipeline have also been assessed as being **low**.

5.2.5 Effects on fish and seafood species

The discharge from the ship loading process has the potential to have adverse effects on existing habitat for fish and seafood species. Given the relatively infrequent and short-term nature of the discharge and the highly mobile nature of fish species the potential adverse effects are assessed as **negligible**. The presence of green lipped mussels in the area of the discharge indicates that ongoing ship loading discharges do not inhibit mussel colonisation and has a **negligible** effect on seafood resource species.

5.2.6 Effects on marine mammals

A number of marine mammal species can be present in the wider marine area around Port Taharoa such as Māui dolphins, common dolphins, southern right whales and Orca/killer whales. Given the low level of risk posed by the ship loading operation and the fact that it has been occurring in the vicinity since the early 1970's, the overall risk of adverse effects for marine mammals is assessed as **negligible**. Nevertheless, to recognise the sensitivity of the marine mammals that traverse the area, TIL propose conditions that require an underwater noise survey to be undertaken if 35 ship visits occur in a 12 month period, in order to inform best practice underwater noise measures.

5.2.7 Effects on coastal processes

TIL seeks to continue the ability to discharge up to 75,000m³ per day of ship loading water, including freshwater and fine sediment, up to a maximum of 7,500,000m³ per year. As a result of dilution and dispersion of the sediment plume provided by oceanic conditions, the effect of this discharge on coastal processes has been assessed as being **less than minor**.

5.2.8 Effects of discharges in the Coastal Marine Area (CMA)

The potential adverse effects of the sediment discharge from the ship-loading events have been addressed above. The discharge includes some trace levels of naturally occurring contaminants in the ironsand that is pumped in slurry form into the ship. Because of the extremely low levels of the naturally occurring contaminants, and the dilution provided by the sea water, the discharge will not result in any measurable toxicity effect on benthic fauna.

TIL is seeking consent to continue to discharge excess process water and stormwater to the CMA at a rate of 32,000m³/day. This discharge occurs infrequently and when there is no suitable alternative to provide for the discharge on land - primarily at times of prolonged heavy rainfall. The potential ecological effects from the process water/stormwater discharge are likely to be even less than those of the ship loading discharge which were assessed to be less than minor. Correspondingly, no further actions to avoid, remedy or mitigate potential effects from the process wastewater and stormwater discharges are required apart from monitoring of the discharge quality and composition.

5.2.9 Effects on navigation safety

The continued ship movements to and from the Port of Taharoa and the occupation of the CMA by ship loading infrastructure have the potential to have adverse effects on navigational safety of other users of the CMA. However, the use of this area for recreational watercraft and commercial vessels is infrequent and the movement of ironsand export ships has been established in the area since the early 1970's. No more than one ship can access the mooring buoy at one time. Furthermore, the Port of Taharoa is operated in compliance with the New Zealand Port and Harbour Marine Safety Code, the Harbourmaster previously had no objection to the continued activity and several improvements have been implemented since the granting of the now expired resource consents in 2002. For these reasons, potential adverse effects on navigation safety have been assessed as **less than minor**.

LEGEND	
	STREAM
	PROPERTY BOUNDARIES
	MINING LICENCE AREA (TAHAROA C BLOCK)
	NORTHERN BLOCK
	CENTRAL BLOCK
	SOUTHERN BLOCK
	30m PERENNIAL WATER BODY / STREAM SETBACK
	100m MHWS SETBACK SUBJECT TO SURVEY
	ARCHEOLOGICAL AREAS RESERVED FROM MINING
	WETLAND

