

# Memorandum on Completeness and Scope

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**File** FTAA-2512-1153

**Application** Central and Southern Block Mining Project

**To** Manager LOA/ Team Leader LOA

**From** [REDACTED]

**Date** 16 February 2026

**Subject** Assessment whether the application complies with section 46(2) of the Fast-track Approvals Act 2024

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## Purpose

1. The purpose of this memo is to assist you in making your decision on whether the Central and Southern Block Mining Project application, received by the Fast-track Team on 26/01/2026 lodged by Taharoa Ironsands Limited complies with the requirements of section 46(2) of the Fast-track Approvals Act 2024 (**the Act**).

## Decision-maker

2. You have delegated authority to make the decision under section 46 of the Act under the instrument of delegation dated 5 February 2025.

## Conflict of interest

3. I confirm that I do not have any conflict of interest in this matter that would prevent me making this assessment.

## The application

4. For projects listed in Schedule 2 of the Act and referred projects, authorised persons may lodge a substantive application for approvals available under the Act.
5. The Central and Southern Block Mining Project is a listed project.
6. The EPA received the substantive application for Central and Southern Block Mining Project on 26 January 2026 by Taharoa Ironsands Limited. The EPA must, in consultation with the relevant

administering agencies and relevant consent authorities, decide whether this substantive application complies with section 46 of the Act by **17 February 2026**.

7. As set out in more detail below, the EPA must decide whether the application is complete and either:
  - provide the application to the Panel Convener for consideration and decision by the expert consenting panel (if complete and within scope); or
  - return it to the person who lodged it (if incomplete and not within scope).

## **Project and Scope**

8. The project is described in Schedule 2 of the Act as:

*Continue existing mineral and extraction including land preparation works, constructing a water supply reservoir, extracting ironsands material using dry and wet-mining techniques, processing extracted material, and transporting raw and processed material.*

9. The approximate geographical location is identified in Schedule 2 of the Act as:

*911 hectares at Taharoa Road, Taharoa, approximately 8 kilometres south of Kawhia and 45 kilometres northwest of Te Kūiti*

10. The Application material for the Central and Southern Block Mining Project is within scope of the project listed in Schedule 2 of the Act. It outlines the continuation of mining activities within the central and southern block, including details of the preparation, dry and wet mining extraction and processing of ironsand of the Taharoa Mine.
11. The associated activities in the CMA relate to the transportation of the material (through a seabed pipeline to a bulk carrier ship moored to a Single Buoy Mooring) offshore within the Taharoa Port, which is clearly listed in Schedule 2. In the alternative, the associated activities in the CME would be involved in, or support and be subsidiary to the project referred to in Schedule 2. The applicant also proposes to clear pine however this would also be an activity involved in, or that supports and is subsidiary to the project referred to in Schedule 2.
12. The geographic extent of the Project—911 hectares at Taharoa Road—is also aligned and stated throughout the Application documents.
13. Based on the above information, I consider the substantive application therefore relates solely to the listed project.

## **Fast-track consenting application process**

### **Legislative context**

14. The EPA must decide whether the substantive application complies with section 46(2) of the Act. A substantive application complies with section 46(2) of the Act, if the application:
  - complies with sections 42, 43 and 44;

- relates solely to a listed project or a referred project;
- the EPA considers that, on the face of the application, the project does not appear to involve an ineligible activity; and
- any fee, charge, or levy payable under the Fast-track Approvals (Cost Recovery) Regulations 2025 (the Regulations) in respect of the application is paid.

#### **Section 42 Requirements**

15. Section 42 of the Act states that an authorised person may lodge a substantive application for one project or substantive applications for each stage of a project. Section 42(4) lists the approvals that may be sought under the Act.
16. This application has been lodged by Taharoa Ironsands Limited. This person is an authorised person as listed under schedule 2 of the Act.
  - A resource consent that would otherwise be applied for under the Resource Management Act;
  - An archaeological authority that would otherwise be applied for under the Heritage New Zealand Pouhere Taonga Act; and
  - A Wildlife approval that would otherwise be authorities applied for under the Wildlife Act
17. All of the above listed approvals are of the type set out in section 42(4) of the Act.
18. For each of the approvals sought, the applicant is eligible to apply for any corresponding approval under a specified Act.

#### **Section 43 Requirements**

19. Section 43 of the Act sets out the requirements for a substantive application. The substantive application was lodged in the form and manner approved by the EPA. Assessment of section 43 requirements is included at Appendix 1.

#### **Section 44 Requirements**

20. Section 44 of the Act requires that the information provided by the applicant under section 43 must be specified in sufficient detail to satisfy the purpose for which it is required. Assessment of section 44 sufficiency is included at Appendix 1.
21. In assessing the sufficiency of information provided by the applicant, we rely on the information provided to us through consultation with each relevant administering agency and consent authority, as summarised in Appendix 2.
22. As set out in more detail in Appendix 2, one of the agencies consulted have advised that some information is provided in insufficient detail to satisfy the purpose for which it is required. This information related to an assessment against under the Waitomo District Plan. However, following my assessment in Checklist A and Checklist E of Appendix 1, I consider that information provided is specified in sufficient detail at this stage.
23. Ineligibility

24. The EPA needs to decide whether it considers that, on the face of the application, the project does not appear to involve an ineligible activity, as defined in section 5 of the Act. As the EPA has to consider this on the face of the application, the EPA is only able to consider information contained in the application materials.
25. The list of ineligible projects includes activities:
- on land returned under a Treaty settlement, on identified Māori Land, on Māori customary land, on land set apart as Māori reservation, or in a customary marine title or protected customary rights area without written permission from the rights holder;
  - on Māori customary land, or land set apart as Māori reservation under Part 17 of Te Ture Whenua Māori Act 1993;
  - in a customary marine or protected customary rights area without written agreement from the rights holder/group;
  - within an aquaculture settlement area without the required authorisation;
  - activities that would be prevented under section 165J, 165M, 165Q, 165ZC, or 165ZDB of the RMA (which deal with occupation of space in the common marine and coastal area); or
  - that require permissions on national reserves held under the Reserves Act 1977 ; or
  - on land listed under clauses 1 to 11 or 14 of Schedule 4 of the Crown Minerals Act 1991 (and clauses 12 and 13 for mining activities).
26. I consider that on the face of the application, the project does not appear to involve an ineligible activity. The applicant has confirmed the activities will occur on identified Māori land (under section 5(1)(a)(i)) and has provided proof of written agreement from the landowner (see Appendix D).

### **Fees and levies**

27. The EPA has received all fees, charges and levies payable by the applicant under the Regulations for the substantive application as follows:
- Application fee in the sum of \$250,000 plus GST; and
  - Levy in the sum of \$140,000 plus GST.

### **Consultation**

28. We have consulted with and considered consultation responses from the following relevant administering agencies and relevant consent authorities:
- with Waikato Regional Council and Waitomo District Council for an approval described in [section 42(4)(a) (resource consent)
  - with the Department of Conservation for an approval described in section 42(4)(h) (Wildlife Act wildlife approval)
  - with Heritage New Zealand Pouhere Taonga for an approval described in section 42(4)(i) (archaeological authority);
29. A summary of the consultation is included at Appendix 2.

**Assessment of compliance for each section of each application form**

30. We have assessed the application materials against the relevant checklists in the prescribed application form. Each assessment is contained within the appropriate approval checklist. These are included in Appendix 1 for ease of reference.
31. My view is that the application does comply with section 46 and the EPA may now notify the applicant of its decision.
32. The EPA must now decide whether the substantive application has a competing application under section 47(3) (under delegation from the Minister for Infrastructure under section 47(10)) within 10 working days from the date of the completeness decision.
33. Once the EPA has made the decision under section 47(3), the EPA can provide the application to the panel convener to commence consideration and decision of the application by the panel.

## Appendix 1: Assessment of section 44 sufficiency

This application seeks the following approval(s) under the Act:

- ☒ A resource consent, change to or cancellation of a resource consent: **checklist A**
- ☒ A wildlife approval: **checklist E.**
- ☒ An archaeological approval: **checklist F.**
- ☒ Approval of person to carry out an activity under an Archaeological Authority: **checklist F1.**
- ☒ Information requirements for all applications **checklist J.**

## CHECKLIST A – Resource consent, change to or cancellation of a resource consent

Clause, Schedule 5	Information required for an approval described in section 42(4)(a) (resource consent) and/or section 42(4)(b) (change or cancellation of resource consent), Clauses 5-8 of Schedule 5	Application Reference	EPA
5(1)(a)	A description of the proposed activity	<b>Substantive Application Report Section 1.1, page 4-5, Section 2.6, Section 4 from page 40, and Appendix J.</b>	<p><b>Addressed.</b></p> <p>“The mine is made up of blocks – with the largest blocks being the Central and Southern Blocks, totalling approximately 911 hectares. This application, known as the Central and Southern Mining Blocks Project, is (in short) to enable the continuation of mining activities within the Central and Southern Blocks of the mine (site) and associated activities in the CMA” – page 3 of Application Report.</p> <p><b>Maps</b> of project site in Appendix J.</p>
5(1)(b)	<p>A description and map of the site at which the activity is to occur, including whether the site is within or adjacent to—</p> <ul style="list-style-type: none"> <li>(i) a statutory area (as defined in the relevant Treaty settlement Act); or</li> <li>(ii) ngā rohe moana o ngā hapū o Ngāti Porou (as defined in section 11 of the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019); or</li> </ul>	<b>Substantive Application Report Section 1.1, page 4-5, Section 2.6, Section 4 from page 40, and Appendix J.</b>	<p><b>Addressed.</b></p> <p><b>Maps</b> of project site found on page 5 and in Appendix J.</p> <p>(i) see section 2.6 .2 (from page 18 of SAR).</p>

	(iii) a protected customary rights area under the Marine and Coastal Area (Takutai Moana) Act 2011		(ii)/(iii) not applicable as stated in page 5 of the application form and page 14 of the Substantive Application Report (SAR).
5(1)(c)	<p>Confirmation that the consent application complies with section 46(2)(a), (b), and (d); being:</p> <ul style="list-style-type: none"> <li>• section 42; and</li> <li>• sections 43 and 44; and</li> <li>• relates solely to a listed project or a referred project; and</li> <li>• any fee, charge, or levy payable under regulations in respect of the application is paid.</li> </ul>	<p><b>Substantive Application Report Section 1.1 page 5, Section 1.3, Section 2, and the checklist on page 15.</b></p> <p><b>The Substantive Application fee and levy will be paid on receipt of an invoice.</b></p>	<p><b>Addressed,</b> as stated by the applicant on page 15 of SAR in table 2.1.</p> <p>Fees were paid on 26/01/2026.</p>
5(1)(d) and 5(6)	The full name and address of—	<b>Substantive Application</b>	<p><b>Addressed,</b> as stated by the applicant.</p> <p><i>“TIL has made all reasonable enquiries to identify the owners and occupiers of</i></p>



	<p>(i) each owner of the site and of land adjacent to the site; and</p> <p>(ii) each occupier of the site and of land adjacent to the site whom the applicant is unable to identify after reasonable inquiry;</p> <p>If the applicant is not able to supply the name and address of the owner and each occupier of the site and of land adjacent to the site because the land is Māori land in multiple ownership, the applicant must include a statement to that effect (clause 5(6)).</p>	<b>Report Appendix B.</b>	<p><i>these properties. It has prepared the list below based on details it has on file, using LINZ records, and using the land data service called GRIP. Where a physical address or contact phone number was unknown TIL has made enquires with the Waikato Regional Council and the Waitomo District Council to confirm these details. For the five properties that do not have confirmed legal addresses, phone numbers have been identified”.</i></p> <p>Appendix D also confirms the owner of the site.</p>
5(1)(e)	A description of any other activities that are part of the proposal to which the consent application relates	<b>Substantive Application Report Section 4 from page 40.</b>	<b>Addressed</b> , as stated by the applicant.
5(1)(f)	A description of any other resource consents, notices of requirement for designations, or alterations to designations required for the project to which the consent application relates	<b>No other consents or designations are required outside</b>	<b>Addressed</b> , as stated by the applicant. (Also stated in table 2.1 on page 16 of the SAR).

		<b>of the FTAA process.</b>	
5(1)(g)	An assessment of the activity against sections 5, 6 and 7 of the Resource Management Act 1991	<b>Substantive Application Report Section 8.2, pages 112 to 115.</b>	<b>Addressed</b> (from page 114 – 117 of SAR).
5(1)(h) (and also clauses 5(2) and 5(3))	<p>An assessment of the activity against any relevant provisions in any of the following documents:</p> <ul style="list-style-type: none"> <li>• a national environmental standard:</li> <li>• other regulations made under the Resource Management Act 1991:</li> <li>• a national policy statement:</li> <li>• a New Zealand coastal policy statement:</li> <li>• a regional policy statement or proposed regional policy statement:</li> <li>• a plan or proposed plan:</li> <li>• a planning document recognised by a relevant iwi authority and lodged with a local authority.</li> </ul> <p>This assessment must include an assessment of the activity against the requirements set out in clause 5(3) of Schedule 5 being:</p>	<b>Substantive Application Report Section 8.3.</b>	<p><b>Addressed</b>, as stated by the applicant.</p> <p><i><b>WDC</b> raised that the applicant relies on existing use rights under section 10 of the Resource Management Act 1991 in relation to both the Operative and Proposed Waitomo District Plan.</i></p> <p><i><b>WDC</b> notes that while it does not disagree that the proposal is likely to meet the section 10 requirements, the application as currently presented does not contain a sufficient level of detail to demonstrate how the activity meets the statutory tests for existing use rights, nor does it clearly establish the baseline effects against which</i></p>

	<ul style="list-style-type: none"> <li>• any relevant objectives, policies or rules in the documents listed; and</li> <li>• any requirement, condition, or permission in any rules in any of those documents; and</li> <li>• any other requirements in any of those documents.</li> </ul>		<p><i>“same or similar” effects can be evaluated.</i></p> <p><b>Addressed</b>, for the following reasons.</p> <p>The applicant has provided its assessment of the activity against the Waitomo District plan/proposed plan in section 5.1.7 of the SAR (from page 66).</p> <p>The applicant states that the application is consistent with the relevant objectives and policies. The applicant also explains that it has existing use rights in relation to the mining of the Central and Southern Blocks, meaning that resource consent is not required under these rules. The application also contains an assessment against permitted activity rules.</p> <p>The applicant has also assessed project against the following documents:</p> <ul style="list-style-type: none"> <li>• 8.3.1 - Resource Management (Measurement and Reporting of</li> </ul>
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			<p>Water Takes) Regulations 2010 – page 117.</p> <ul style="list-style-type: none"> <li>• 8.3.2 - National Policy Statement for Freshwater Management 2020 – page 118.</li> <li>• 8.3.3 - National Policy Statement for Indigenous Biodiversity 2023 – page from 120.</li> <li>• 8.3.4 - New Zealand Coastal Policy Statement 2010 – from page 120.</li> <li>• 8.3.5 - Waikato Regional Policy Statement – from page 125.</li> <li>• 8.3.6 - Waikato Regional Plan – from page 129.</li> <li>• 8.3.7 - Waikato Regional Coastal Plans – from page 133.</li> <li>• 8.3.8 - Ngāti Mahuta Environmental Management Plan – page 138.</li> </ul>
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			<ul style="list-style-type: none"> <li>• 8.3.9 - Waikato-Tainui Environmental Plan – from page 138.</li> <li>• 8.3.10 - Maniapoto Environmental Management Plan – from page 147.</li> </ul> <p>The Applicant also provided an <a href="#">addendum to the application</a>, providing an Assessment of the new and updated National Direction Instruments, 23 January 2026.</p>
5(1)(i)	<p>Information about any Treaty settlements that apply in the area covered by the consent application, including—</p> <ul style="list-style-type: none"> <li>(i) identification of the relevant provisions in those Treaty settlements; and</li> <li>(ii) a summary of any redress provided by those settlements that affects natural and physical resources relevant to the project or project area</li> </ul>	<p><b>Substantive Application Report Section 2.6 pages 17 -19.</b></p>	<p><b>Addressed.</b></p> <p>Relevant treaty settlements that apply to the project area and redress information:</p> <ul style="list-style-type: none"> <li>• Waikato-Tainui Deed of Settlement signed 22 May 1995 recorded in the Waikato Raupatu Claims Settlement Act 1995.</li> <li>• Maniapoto Deed of Settlement signed 11 November 2021</li> </ul>

			recorded in the Maniapoto Claims Settlement Act 2022.
5(1)(j)	A list of any relevant customary marine title groups, protected customary rights groups, ngā hapū o Ngāti Porou (where an application is within, adjacent to or directly affecting ngā rohe moana o ngā hapū o Ngāti Porou), or applicants under the Marine and Coastal Area (Takutai Moana) Act 2011;	<b>Substantive Application Report Section 6 page 70, Section 7.5 page 78 and Appendix Y.</b>	<b>Addressed.</b> See section 6 from page 70. See section 7.5 from page 79.
5(1)(k)	The conditions that the applicant proposes for the resource consent.	<b>Substantive Application Report Section 8.5 and Appendix BB.</b>	<b>Addressed,</b> as stated by the applicant (from page 153 of SAR). Proposed conditions – appendix BB.
5(1)(l)	if a notice under section 30(3)(b) or (5) has been received,— <ul style="list-style-type: none"> <li>(i) a copy of that notice showing that it was received within the time frame specified in section 30(6)(b); and</li> <li>(ii) if a notice has been received under section 30(5), any more up-to-date information that the applicant is aware of about the existing resource consent referred to in the notice.</li> </ul>	<b>Substantive Application Report - Appendix MM - Consent Authority Section 30(3) notices</b>	<b>Addressed,</b> as stated by the applicant. <a href="#">42.Appendix MM - Consent Authority Section 30(3) notices(904320122.1).pdf</a> Notice received 1 December 2025. Applicant lodged application on 26 January 2026.

			<i><b>WRC</b> confirmed on 4 February 2025, that written notice prepared on 1 December 2025 remains accurate.</i>
5(4)(a)	An assessment of the activity's effects on the environment that includes the information required by clause 6.	<b>Substantive Application Report Section 8.1 pages 80 - 112 and technical reports appended to the Report.</b>	<b>Addressed</b> , see below.
5(4)(b)	An assessment of the activity's effects on the environment that covers the matters specified in clause 7.	<b>Substantive Application Report Section 8.1 pages 80 - 112 and technical reports appended to the Report.</b>	<b>Addressed</b> , see below.

6	<p>(1) The assessment of an activity's effects on the environment must include the following information:</p> <ul style="list-style-type: none"> <li>(a) an assessment of the actual or potential effects on the environment:</li> <li>(b) if the activity includes the use of hazardous installations, an assessment of any risks to the environment that are likely to arise from such use:</li> <li>(c) if the activity includes the discharge of any contaminant, a description of— <ul style="list-style-type: none"> <li>(i) the nature of the discharge and the sensitivity of the receiving environment to adverse effects; and</li> <li>(ii) any possible alternative methods of discharge, including discharge into any other receiving environment:</li> </ul> </li> <li>(d) a description of the mitigation measures (including safeguards and contingency plans where relevant) to be undertaken to help prevent or reduce the actual or potential effect of the activity:</li> <li>(e) identification of persons who may be affected by the activity and any response to the views of any persons consulted, including the views of iwi or hapū that have been consulted in relation to the proposal:</li> </ul>	<p><b>Substantive Application Report Section 8.1 pages 80 - 112 and technical reports appended to the Report.</b></p>	<p><b>Addressed.</b></p> <p>A – throughout section 8.1 from page 84 (i.e., section 8.1.3.4 - 8.1.16 and section 8.1.18.9 - 8.1.19.2, and associated technical reports i.e., appendix I, K, L, M, N, O, Q, R, S, V, and W)</p> <p>B – section 8.1.19 from page 113.</p> <p>C – section 8.1.6 from page 90. Effects of discharge of stormwater and process water can also be found in appendix Q (specifically see section 4.3). Alternative methods of discharges can also be found in section 4.21 on page 55 of SAR.</p> <p>D – throughout Section 8.1 and within technical reports (i.e., appendix K, L, M, S) and draft management plans and conditions.</p> <p>E – See section 6 on page 70. Details of consultation are found in section 7.1 of SAR and also appendices Y and Z.</p>
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	<p>(f) if iwi or hapū elect not to respond when consulted on the proposal, any reasons that they have specified for that decision:</p> <p>(g) if the scale and significance of the activity's effects are such that monitoring is required, a description of how the effects will be monitored and by whom, if the activity is approved:</p> <p>(h) an assessment of any effects of the activity on the exercise of a protected customary right.</p>		<p>F – Appendix Y records where no responses were received and any follow up attempts the applicant made.</p> <p>G – throughout the SAR (e.g., Wetland monitoring – section 8.1.5.4, fish pass and stream monitoring – section 8.1.13, groundwater monitoring – section 8.1.13.3) and also within technical reports. Description of whom should undertake the monitoring is addressed in the proposed conditions and various proposed management plans.</p> <p>H – not applicable.</p>
7	<p>The assessment of an activity's effects on the environment must cover the following matters:</p> <p>(a) any effect on the people in the neighbourhood and, if relevant, the wider community, including any social, economic, or cultural effects:</p>	<p><b>Substantive Application Report Section 8.1 pages 80 - 112 and</b></p>	<p><b>Addressed.</b></p> <p>A – section 8.1.3 of SAR (pages 81-83). Cultural effects are assessed in section 8.1.18.</p>

<ul style="list-style-type: none"> <li>(b) any physical effect on the locality, including landscape and visual effects:</li> <li>(c) any effect on ecosystems, including effects on plants or animals and physical disturbance of habitats in the vicinity:</li> <li>(d) any effect on natural and physical resources that have aesthetic, recreational, scientific, historical, spiritual, or cultural value, or other special value, for present or future generations:</li> <li>(e) any discharge of contaminants into the environment and options for the treatment and disposal of contaminants:</li> <li>(f) any unreasonable emission of noise:</li> <li>(g) any risk to the neighbourhood, the wider community, or the environment through natural hazards or hazardous installations.</li> </ul>	<p><b>technical reports appended to the Report.</b></p>	<p>B – throughout section 8.1 of SAR (i.e., see section 8.1.7 - 8.1.9, 8.11 and 8.1.18.4), table 8.8 of SAR. Section 8.2 provides an assessment on amenity values and natural character. Appendix S.</p> <p>C – throughout section 8.1 of SAR (i.e., section 8.1.11 - 8.1.14, table 8.3 and 8.5) and within various technical reports (i.e. appendix M and K).</p> <p>D – sections 3.2.1 and 8.1.18 (from page 108). Sections 8.1.18.1 - 8.1.18.5). Section 8.1.10 also discusses the the archaeological effects (from page 94).</p> <p>E – sections 8.1.6 (page 90) and 8.1.9.3 (page 93). Discharge of access stormwater and process water is discussed in appendix V. Methods of disposal are further discussed in section 4.21 (consideration of alternatives –page 55).</p>
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			<p>F – section 4.14 (page 51) and throughout section 8.1 (i.e. page 105) of SAR. Also see Appendix W (Noise assessment).</p> <p>G – See section 2.9 of SAR (page 22) - Also see technical reports (see Appendix I).</p>
5(5)(a)	If a permitted activity is part of the proposal to which the consent application relates, a description that demonstrates that the activity complies with the requirements, conditions, and permissions for the permitted activity (so that a resource consent is not required for that activity under section 87A(1) of the Resource Management Act 1991)	<b>Substantive Application Report Section 5.1.8, Table 5.7 from page 67.</b>	<b>Addressed</b> , as stated by the applicant.
5(5)(b)	If the activity is to occur in an area that is within the scope of a planning document prepared by a customary marine title group under section 85 of the Marine and Coastal Area (Takutai Moana) Act 2011 or the environmental covenant prepared by ngā hapū o Ngāti Porou under section 19 of the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019, an assessment of the activity against any resource management matters set out in that document	<b>Not applicable to this application.</b>	<b>Not applicable.</b>

5(5)(c)	If the activity is to occur in an area that is taiāpure-local fishery, a mātaihai reserve, or an area that is subject to bylaws made under Part 9 of the Fisheries Act 1996, an assessment of the effects of the activity on the use or management of the area.	<b>Not applicable to this application.</b>	<b>Not applicable.</b>
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#### CHECKLIST E – Wildlife approval

Clause, Schedule 7	Information required for an approval described in section 42(4)(h) (Wildlife Act approval), clause 2 of Schedule 7	Application Reference	EPA
2(1)(a)	Specify the purpose of the proposed activity	<b>Substantive Application Report Section 1.3.2 page 10 and Section 5.2 page 68 and Appendix KK page 1.</b>	<b>Addressed</b> , as stated by the applicant. Appendix KK - including the enclosed Lizard Management Plan (LMP).
2(1)(b)	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)	<b>Substantive Application Report Appendix KK page 1-2 and enclosed Management Plan.</b>	<b>Addressed.</b> Appendix KK - see section 3 of the enclosed LMP (page 2).

2(1)(c)	An assessment of the activity and its impacts against the purpose of the Wildlife Act	<b>Substantive Application Report Appendix KK page 2 and enclosed Management Plan.</b>	<b>Addressed.</b> Appendix KK – see section 4 of the enclosed LMP (page 4).
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	<b>Substantive Application Report Appendix KK page 2 and enclosed Management Plan.</b>	<b>Addressed,</b> as stated by the applicant. Appendix KK - see section 5 of the LMP, specifically Table 1 on page 7.
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)	<b>Substantive Application Report Appendix KK page 2 and enclosed Management Plan.</b>	<b>Addressed,</b> as stated by the applicant. Appendix KK - see section 5.4.3 on page 13 of LMP.
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	<b>Substantive Application Report Appendix KK page 2 and enclosed Management Plan.</b>	<b>Addressed,</b> as stated by the applicant. Appendix KK - see section 6 on page 18 of LMP.

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:	<b>Substantive Application Report Appendix KK page 2 and enclosed Management Plan.</b>	<p><b>Addressed</b>, as stated by the applicant.</p> <p>Appendix KK - see methods of capture and release in sections 6.4.2 - 6.4.5 of the LMP, pages 19-27.</p> <p>Animal ethics considerations are addressed in section 6.4.2.4 of the LMP (page 21).</p>
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)	<b>Substantive Application Report Appendix KK page 3 and enclosed Management Plan.</b>	<p><b>Addressed</b>, as stated by the applicant.</p> <p>Appendix KK - See section 3.2.1 of LMP and associated Map 1 (pages 2-3).</p>
2(1)(i)	A statement of whether authorisation is sought to temporarily hold or relocate wildlife	<b>Substantive Application Report Appendix KK page 3 and enclosed Management Plan.</b>	<p><b>Addressed</b>, as stated by the applicant.</p> <p>Appendix KK - See section 2 of LMP and the map of the site on page 1.</p>

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	<b>Substantive Application Report Appendix KK page 3 and enclosed Management Plan.</b>	<p><b>Addressed</b>, as stated by the applicant.</p> <p>Appendix KK - See section 5.4.3 of LMP and the map of the site on page 13.</p> <p>See summary of potential effects if lizards are present at section 5.4.4. and table 3 on page 18.</p>
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)	<b>Substantive Application Report Appendix KK page 3 and enclosed Management Plan.</b>	<p><b>Addressed</b>, as stated by the applicant.</p> <p>Appendix KK - See sections 6.3 - 6.5 of LMP (from page 19).</p> <p>The applicant states that the impacts on the lizard cannot be avoided due to removing all vegetation within the project site.</p> <p>applicant addresses minimising effects on the lizard from section 6.4 (including lizard surveys and salvage methods).</p>

			applicant proposes a proposes monetary compensation to a local environmental group to support wildlife (including lizards) addressed in section 6.5.
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	<b>Substantive Application Report Appendix KK page 3.</b>	<b>Addressed,</b> as referenced by the applicant.
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	<b>Substantive Application Report Appendix KK page 3.</b>	<b>Addressed,</b> as referenced by the applicant.
2(1)(n)	Provision of proof and details of all consultation, including with hapū or iwi, on the application specific to wildlife impacts	<b>Substantive Application Report Appendix KK page 3 - 4. Proof is enclosed with Appendix KK. See also Appendix Y and Z, and Section 7 of the Substantive Application Report.</b>	<b>Addressed,</b> as stated by the applicant.



2(1)(o)	Provision of any additional written expert views, advice, or opinions the applicant has obtained concerning their proposal	<b>Substantive Application Report Appendix KK page 4, and enclosed Management Plan</b>	<p><b>Addressed</b>, as stated by the applicant (page 4).</p> <p>Wildlife assessment prepared by Boffa Miskell - Appendix KK and LMP within.</p> <p>Also, the Ecological Assessment – Fauna prepared by an independent technical expert (SLR Consulting) (Appendix M) which addresses the potential effects of the project on herpetofauna.</p>
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#### CHECKLIST F – Archaeological authority

Clause, Schedule 8	Information required for an approval described in section 43(3)(i) Archaeological Authority	Application Reference	EPA
2(1)(a)	a legal description of the land or, if one is not available, a description that is sufficient to identify the land to which the application relates	<b>Substantive Application Report Section 1.2 page 6.</b>	<b>Addressed</b> , as stated by the applicant.

		<b>Section 10 provides a description of the particular sites. See page 1 of Appendix X - Archaeological Application.</b>	
2(1)(b)	the name of the owner of the relevant land, if the applicant is not the owner of the land	<b>Substantive Application Report Section 6 page 73. See pages 1 of Appendix X - Archaeological Application.</b>	<b>Addressed</b> , as stated by the application.
2(1)(c)	proof of consent, if the owner of the relevant land has consented to the proposed activity	<b>Substantive Application Report Section 6 page 73.</b>  <b>See page 1 of Appendix X - Archaeological Application and Landowner Consent (page 166).</b>	<b>Addressed</b> as stated by the applicant.  See PDF page 166 of Appendix X (landowner consent letter).

2(1)(d)	confirmation that the application complies with <a href="#">section 42</a> , 43, and <a href="#">44</a> of the Act	<b>Substantive Application Report Section 1.1 page 5. See page 3 of Appendix X - Archaeological Application.</b>	<b>Addressed</b> , as stated by the applicant.  Specifically see page 3 of Appendix X.
	confirmation that the application relates solely to a listed project or a referred project	<b>Application Report Section 1.1 page 5. See page 3 of Appendix X - Archaeological Application.</b>	<b>Addressed</b> , as stated by the applicant.  Specifically see page 3 of Appendix X.
	any fee, charge, or levy payable under regulations in respect of the application is paid.	<b>Invoice of application fee and levy to be raised by the EPA.</b>	<b>Addressed.</b>  Fees were paid on 26 January 2026.
2(1)(e)	a description of each archaeological site to which the application relates and the location of each site	<b>Substantive Application Report Section 10. See page 3 of Appendix X - Archaeological Application and</b>	<b>Addressed</b> , as stated by the applicant.  Specifically, Table 1 on page 39 of Appendix X.

		<b>Archaeological Assessment.</b>	
2(1)(f)	a description of the activity for which the authority is sought	<b>See page 3 of Appendix X - Archaeological Application and Archaeological Assessment.</b>	<b>Addressed,</b> as stated by the applicant.
2(1)(g)	a description of how the proposed activity will modify or destroy each archaeological site	<b>See page 4 of Appendix X - Archaeological Application.</b>	<b>Addressed,</b> as stated by the applicant.
2(1)(h)	<p>except in the case of an approval described in section 44(b) of the HNZPT Act, an assessment of—</p> <ul style="list-style-type: none"> <li>(i) the archaeological, Māori, and other relevant values of the archaeological site in the detail that is appropriate to the scale and significance of the proposed activity and the proposed modification or destruction of the archaeological site; and</li> <li>(ii) the effect of the proposed activity on those values</li> </ul>	<b>See page 5 of Appendix X - Archaeological Application.</b>	<p><b>Addressed,</b> as stated by the applicant.</p> <p>See table 4 of appendix X on page 78).</p> <p>Also addressed on page 94 of the SAR.</p> <p>Cultural values report has been provided for the archaeological assessment (contained within appendix X on PDF page 145).</p>

2(1)(i)	<p>a statement as to whether consultation with tangata whenua, the owner of the relevant land (if the applicant is not the owner), or any other person likely to be affected—</p> <ul style="list-style-type: none"> <li>(i) has taken place, with details of the consultation, including the names of the parties and the tenor of the views expressed; or</li> <li>(ii) has not taken place or been completed, with the reasons why consultation has not occurred or been completed (as applicable).</li> </ul>	<p><b>Substantive Application Report Section 6 at page 73 &amp; Section 7 starting at page 75. See page 5 of Appendix X - Archaeological Application &amp; Landowner consent letter.</b></p>	<p><b>Addressed</b>, as stated by the applicant and on page 5 of appendix X.</p> <p>Consultation with relevant groups found in sections 6 and 7 of SAR. Consultation and feedback also summarised in Appendix Y.</p> <p>Also see PDF page 166 of Appendix X (landowner consent letter).</p>
	<p><b>Additional information applicants may include in their application for an approval described in section 43(3)(i) Archaeological Authority</b></p>	<p><b>Application Reference</b></p>	
	<p>Have any archaeological authorities been granted for this location in the past?</p>	<p><b>See page 6 of Appendix X - Archaeological Application.</b></p>	<p><b>Addressed</b>, as referenced by the applicant.</p>
	<p>Identification of the relevant planning overlays, i.e. are there any relevant Heritage or QEII covenants or Heritage Orders, District</p>	<p><b>See page 6 of Appendix X -</b></p>	<p><b>Addressed</b>, as stated by the applicant.</p>

	Plan schedules, New Zealand Heritage list/Rārangī Kōrero entries?	<b>Archaeological Application.</b>	
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#### **CHECKLIST F1 – Archaeological authority: Approval for person to carry out activity**

<b>Clause 7(5), Schedule 8</b>	<b>Information required for an approval described in clauses 7(1) and (2)(b) (approval of person to carry out activity)</b>	<b>Application Reference</b>	<b>EPA</b>
(a)	Evidence that the person carrying out the activity under an authority has sufficient skill and competency, is fully capable of ensuring that the proposed activity is carried out to the satisfaction of Heritage New Zealand Pouhere Taonga, and has access to appropriate institutional and professional support and resources	<b>Substantive Application Report Appendix X - Archaeological Application page 9.</b>	<b>Addressed</b> , as stated by the applicant.
(b)(i)	In the case of a site of interest to Māori, evidence that the person carrying out the activity under an authority has the requisite competencies for recognising and respecting Māori values	<b>Substantive Application Report Appendix X - Archaeological Application page 10.</b>	<b>Addressed</b> , as stated by the applicant.

(b)(ii)	In the case of a site of interest to Māori, evidence that the person carrying out the activity under an authority has access to appropriate cultural support	<b>Substantive Application Report Appendix X - Archaeological Application page 10.</b>	<b>Addressed</b> , as stated by the applicant.
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#### CHECKLIST J – Listed project information requirements

Section, Fast-track Approvals Act	Information required for a substantive application under section 43(2) and section 13(4)	Application Reference	EPA (office use only)
13(4)(a)	a description of the project and the activities it involves	<b>Substantive Application Report Section 1.1 at page 4 and Section 4 starting at page 40.</b>	<b>Addressed</b> , as stated by the applicant.  A description of the proposed works can be found in section 4 of SAR.

13(4)(c)	information to demonstrate that the project does not involve any ineligible activities (other than activities that may be the subject of a determination under section 23 or 24)	<b>Substantive Application Report Section 2.3 at pages 13 - 14.</b>	<b>Addressed</b> , as stated by the applicant.  <i>“This application is not for an ineligible activity as defined in section 5 of the FTAA. Although it is located on identified Māori land (section 5(1)(a)(i)), the owners of the land have provided agreement in writing to the proposed activity”</i>
13(4)(d)	a description or map of the whole project area that identifies its boundaries in sufficient detail to enable consideration of the referral application	<b>Substantive Application Report Section 1.1 at page 4 Section 3 at page 27 and Appendix J.</b>	<b>Addressed</b> , as referenced by the applicant.  Figures 1.1 and 3.3 in SAR.  <b>Maps</b> of project site also found in Appendix J.
13(4)(e)	the anticipated commencement and completion dates for construction activities (where relevant)	<b>Substantive Application Report Section 4 from page 40 provides a description of the works. TIL is</b>	<b>Addressed.</b>  The applicant is seeking a term of 35 years (addressed in the executive summary – page 1).



		<b>seeking a term of 35 years.</b>	<b>Note (page 19 of SAR):</b> <i>The applicant is currently undertaking mining activity on the Central and Southern Blocks of Taharoa C Block and associated activity in the CMA under a suite of now expired resource consents pursuant to the RMA (a specified Act in the FTAA) granted by the WRC in 2006...As outlined earlier, TIL is currently operating in reliance on these resource consents pursuant to section 124 of the RMA.</i>
13(4)(f)(i)	a statement of whether the project is planned to proceed in stages and, if so an outline of the nature and timing of the stages	<b>Substantive Application Report Section 4 from page 40 provides a description of the works. See section 4.6 in particular.</b>	<b>Addressed</b> , as stated by the applicant in section 4.6 (from page 44).
13(4)(h)	a description of the anticipated and known adverse effects of the project on the environment	<b>Substantive Application Report Section 8.1 pages 80 to 112, and</b>	<b>Addressed</b> , as referenced by the applicant (from pages 81 -115).

		<b>appended technical reports.</b>	
13(4)(i)	a statement of any activities involved in the project that are prohibited activities under the Resource Management Act 1991	<b>This application does not include any prohibited activities.</b>	<b>Not applicable.</b>
13(4)(j)	<p>a list of the persons and groups the applicant considers are likely to be affected by the project, including—</p> <ul style="list-style-type: none"> <li>(i) relevant local authorities:</li> <li>(ii) iwi authorities and groups that represent hapū that are parties to relevant Mana Whakahono ā Rohe or joint management agreements:</li> <li>(iii) other relevant iwi authorities:</li> <li>(iv) relevant Treaty settlement entities:</li> <li>(v) relevant protected customary rights groups and customary marine title groups:</li> <li>(vi) ngā hapū o Ngāti Porou, if the project area is within or adjacent to, or the project would directly affect, ngā rohe moana o ngā hapū o Ngāti Porou:</li> <li>(vii) relevant applicant groups under the Marine and Coastal Area (Takutai Moana) Act 2011:</li> </ul>	<b>Substantive Application Report Section 6 at pages 70 - 72.</b>	<b>Addressed</b> , as referenced by the applicant.

	(viii) persons with a registered interest in land that may need to be acquired under the Public Works Act 1981:		
13(4)(k)	a summary of— (i) the consultation undertaken for the purposes of section 29 and any other consultation undertaken on the project with the persons and groups referred to in paragraph (j); and (ii) how the consultation has informed the project:	<b>Substantive Application Report Section 7 pages 72 - 89. See also Appendix Y and Appendix Z.</b>	<b>Addressed</b> , as stated by the applicant on page 7.1 and 7.2 (from page 72).
13(4)(l)	a list of any Treaty settlements that apply to the project area, and a summary of the relevant principles and provisions in those settlements	<b>Substantive Application Report Section 2.6 pages 17 - 18.</b>	<b>Addressed</b> , as stated by the applicant.
13(4)(m)	a description of any processes already undertaken under the Public Works Act 1981 in relation to the project	<b>Not applicable to this application.</b>	<b>Not applicable.</b>
13(4)(n)	a statement of any relevant principles or provisions in the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019	<b>Not applicable to this application.</b>	<b>Not applicable.</b>
13(4)(o)	information identifying the parcels of Māori land, marae, and identified wāhi tapu within the project area	<b>Substantive Application Report</b>	<b>Addressed</b> , as referenced by the applicant.

		<b>Section 3.2 page 29 and Appendix D.</b>	Section 8.1.18.2 also addresses disturbance to wāhi tapu (page 109).
13(4)(p)	a statement of whether the applicant is seeking a determination under section 23 and, if so, an assessment of the effects of the activity on the relevant land and on the rights and interests of Māori in that land	<b>Not applicable to this application.</b>	<b>Not applicable.</b>
13(4)(q)	a statement of whether the applicant is seeking a determination under section 24(2) and, if so, a description of— <ul style="list-style-type: none"> <li>(i) the scale and adverse effects of the existing electricity infrastructure; and</li> <li>(ii) how, if at all, that scale or those adverse effects are anticipated or known to change as a result of the maintenance, upgrading, or continued operation of the infrastructure</li> </ul>	<b>Not applicable to this application.</b>	<b>Not applicable.</b>
13(4)(r)	a statement of whether the applicant is seeking a determination under section 24(4) and, if so,— <ul style="list-style-type: none"> <li>(i) a description of every alternative site considered by the applicant (or, if the referral application is lodged by more than 1 person, any of those persons) for the</li> </ul>	<b>Not applicable to this application.</b>	<b>Not applicable.</b>

	<p>construction and operation of the new electricity lines (the activity); and</p> <p>(ii) for each alternative site considered,—</p> <p>(A) a statement of the anticipated and known financial cost of undertaking the activity; and</p> <p>(B) a description of the anticipated and known adverse effects of undertaking the activity; and</p> <p>(C) a description of the anticipated and known financial cost and practicality of available measures to avoid, remedy, mitigate, offset, or compensate for the anticipated and known adverse effects of the activity; and</p> <p>(D) a description of any issues (including financial cost) that would make it impractical to undertake the activity on the site; and</p> <p>(E) an assessment of whether it would be reasonable and practical to undertake the activity on the site, taking into account the matters referred to in subparagraphs (A) to (D) and any other relevant matters</p>		
13(4)(s)	a description of the applicant's legal interest (if any), or if the application is lodged by more than 1 person, the legal interest of any of those persons) (if any), in the land on which	<b>Substantive Application Report Section 2.7 at pages</b>	<b>Addressed</b> , as referenced by the applicant.

	the project will occur, including a statement of how that affects the applicant's ability to undertake the work	<b>18 -19 and Appendix D and E.</b>	<i>Page 19 - TIL has the right to undertake its operations on the site under a lease agreement with Taharoa C Block.</i>
13(4)(t)	an outline of the types of consents, certificates, designations, concessions, and other legal authorisations (other than contractual authorisations or the proposed approvals) that the applicant considers are needed to authorise the project, including any that the applicant considers may be needed by someone other than the applicant	<b>Substantive Application Report Section 5 pages 56 to 69.</b>	<b>Addressed</b> , as referenced by the applicant.
13(4)(u)	whether any activities that are involved in the project, or are substantially the same as those involved in the project, have been the subject of an application or a decision under a specified Act and,—  (i) if an application has been made, details of the application:  (ii) if a decision has been made, the outcome of the decision and the reasons for it:	<b>Substantive Application Report Section 2.8 pages 19 - 22 and Appendix F, G and H.</b>	<b>Addressed</b> , as referenced by the applicant.
13(4)(v)	a description of whether and how the project would be affected by climate change and natural hazards	<b>Substantive Application Report Section 2.9 page 22.</b>	<b>Addressed</b> , as referenced by the applicant.

13(4)(w)	if the application is lodged by more than 1 person, a statement of the proposed approval to be held by each of those persons	<b>Not applicable to this application.</b>	<b>Not applicable.</b>
13(4)(x)	a summary of compliance or enforcement actions (if any), and the outcome of those actions, taken against the applicant (or if the application is lodged by more than 1 person, any of those persons) under a specified Act	<b>Substantive Application Report Section 2.10.</b>	<b>Addressed</b> , as stated by the applicant (pages 23-24).
13(4)(y)	Please provide the information specified below for the relevant approval(s) sought. This is the information specified in the relevant schedule.		
13(4)(y)(i), clause 2 of Schedule 5	<p><b>Resource consent or designation</b></p> <p>(a) an assessment of the project against—</p> <ul style="list-style-type: none"> <li>(i) any relevant national policy statement; and</li> <li>(ii) any relevant national environmental standards; and</li> <li>(iii) if relevant, the New Zealand Coastal Policy Statement; and</li> </ul>	<b>Substantive Application Report Sections 5.1 from page 26 and 8.3 from page 114.</b>	<p><b>Addressed</b>, as stated by the applicant.</p> <p>Specifically, see the following sections:</p> <ul style="list-style-type: none"> <li>• 8.3.2 - National Policy Statement for Freshwater Management 2020 (page 118).</li> <li>• 8.3.3 - National Policy Statement for Indigenous Biodiversity 2023 (page 120).</li> </ul>

			<ul style="list-style-type: none"> <li>• 5.1.1 - National Environmental Standard for Freshwater 2020 (page 56).</li> <li>• 5.1.2 - National Environmental Standard for Commercial Forestry 2017 (page 57).</li> <li>• 8.3.4 - New Zealand Coastal Policy Statement 2010 (page 120).</li> </ul>
	(b) in relation to any proposed approval that is a resource consent, whether, to the best of the applicant's knowledge, there are any existing resource consents of the kind referred to in section 30(3)(a).	<b>Not applicable to this application. TIL is the holder of existing resource consents for the site to which this application relates.</b>	<b>Addressed</b> , as stated by the applicant.
13(4)(y)(ii), clause 3 of Schedule 5	<b>Change or cancellation of resource consent condition</b> The information to be provided under section 13(4)(y)(ii) is information about whether and how the change or cancellation of the condition is material to the implementation or delivery of the project.	<b>Not applicable to this application.</b>	<b>Not applicable.</b>



13(4)(y)(iii), clause 4 of Schedule 5	<p><b>Certificate of compliance</b></p> <p>The information required to be provided under section 13(4)(y)(iii) is information that shows the activity that the certificate of compliance is intended to cover can be done lawfully in the particular location without a resource consent. Include information that shows that the activity that the certificate of compliance is intended to cover can be done lawfully in the particular location without a resource consent.</p>	<b>Not applicable to this application.</b>	<b>Not applicable.</b>
13(4)(y)(iv), clause 2 of Schedule 6	<p><b>Concession</b></p> <p>(1) The information in subclause (2) is required to be provided under section 13(4)(y)(iv) if a proposed concession includes a lease and—</p> <ul style="list-style-type: none"> <li>(a) the lease would be for a term (including any renewals) that will or is likely to be more than 50 years; and</li> <li>(b) the granting of the lease would trigger a right of first refusal or a right of offer or return.</li> </ul> <p>(2) Confirmation that the applicant has written agreement from the holder of the right of first refusal or right of offer or return to waive that right for the purposes of the proposed lease.</p>	<b>Not applicable to this application.</b>	<b>Not applicable.</b>

13(4)(y)(v), clause 23 of Schedule 6	<b>Land exchange</b> (1) The information required to be provided under section 13(4)(y)(v) is (a) - (e) below: (a) a description of both land areas proposed for exchange (for example, maps showing areas and location, addresses, and legal descriptions where possible:	<b>Not applicable to this application.</b>	<b>Not applicable.</b>
	(b) the financial value of the land proposed to be acquired by the Crown:	<b>Not applicable to this application.</b>	<b>Not applicable.</b>
	(c) a brief description of the conservation values of both pieces of land, including an explanation of why the exchange would benefit the conservation estate:	<b>Not applicable to this application.</b>	<b>Not applicable.</b>
	(d) if the land exchange would trigger a right of first refusal or a right of offer or return, confirmation that the applicant has written agreement from the holder of the right of first refusal or right of offer or return that the holder has agreed to waive that right for the purpose of the land exchange:	<b>Not applicable to this application.</b>	<b>Not applicable.</b>
	(e) confirmation by the applicant that no part of any land to be exchanged by the Crown is –	<b>Not applicable to this application.</b>	<b>Not applicable.</b>

	<ul style="list-style-type: none"> <li>(i) land listed in Schedule 4; or</li> <li>(ii) a reserve declared to be a national reserve under section 13 of the Reserves Act 1977</li> </ul>		
13(4)(y)(vi), clause 2 of Schedule 9	<p><b>Standard or complex freshwater fisheries activity approval</b></p> <p>(2) The information required to be provided under section 13(4)(y)(vi) is the following:</p> <ul style="list-style-type: none"> <li>(a) whether an in-stream structure is proposed (including formal notification of any dam or diversion structure) and the extent to which this may impede fish passage; and</li> <li>(b) whether any fish salvage activities or other complex freshwater fisheries activities are proposed.</li> </ul>	<b>Not applicable to this application.</b>	<b>Not applicable.</b>
13(4)(y)(vii), clause 2 of Schedule 10	<p><b>Marine consent</b></p> <p>(1) The information required to be provided under section 13(4)(y)(vii) is–</p> <ul style="list-style-type: none"> <li>(a) information about whether the Minister of Conservation is an affected person:</li> </ul>	<b>Not applicable to this application.</b>	<b>Not applicable.</b>

	<p>(b) additional information about whether the applicant has already made an application for a consent under the EEZ Act in relation to the project, and, if so,—</p> <p>(i) details of any application made; and</p> <p>(ii) the decisions made on that application; and</p> <p>(iii) information about the matters that the Minister may consider under section 22(6):</p>	<b>Not applicable to this application.</b>	<b>Not applicable.</b>
	<p>(c) additional information (in a summary form) about compliance or enforcement action taken against the applicant by the EPA under the EEZ Act.</p>	<b>Not applicable to this application.</b>	<b>Not applicable.</b>
13(4)(y)(viii), clause 2 of Schedule 11	<p><b>Access arrangement</b></p> <p>(1) Confirmation that the applicant has complied with section 12(2) (for the purposes of section 13(4)(y)(viii)).</p>	<b>Not applicable to this application.</b>	<b>Not applicable.</b>

13(4)(y)(ix), clause 15 of Schedule 11	<p><b>Mining permit</b></p> <p>(1) For the purposes of section 13(4)(y)(ix), the information is—</p> <ul style="list-style-type: none"> <li>(a) a copy of the relevant exploration permit or existing privilege to be exchanged for a mining permit that entitles the holder to mine a Crown owned mineral:</li> <li>(b) the name and contact details of the proposed permit participants and the proposed permit operator:</li> <li>(c) a proposed work programme for the proposed permit, which may comprise committed work, committed or contingent work, or both:</li> <li>(d) evidence of the technical or financial capability of the proposed permit holder to comply with and give proper effect to the work programme:</li> <li>(e) information about the proposed permit holder's history of compliance with mining or similar permits and their conditions:</li> <li>(f) the proposed date on which the substantive application is intended to be lodged:</li> <li>(g) if the authorised person proposes to provide information under section 37, the date on which the person intends to provide that information:</li> </ul>	<b>Not applicable to this application.</b>	<b>Not applicable.</b>
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	<p>(h) the proposed duration of the permit:</p> <p>(i) if the proposed approvals include a mining permit for petroleum,—</p> <p>(i) a map of the area over which the mining permit application is intended to be made, the area in which the surrender of an exploration permit or existing privileges is proposed (which must be same area as the area over which the mining permit application is intended to be made), and the extent of the resource to which the development plan relates:</p> <p>(ii) the resources and reserves relating to the project, estimated in accordance with the Petroleum Resources Management System:</p> <p>(iii) a high-level overview of the following:</p> <p>(A) the proposed field development plan:</p> <p>(B) the proposed date for the commencement of petroleum production:</p> <p>(C) the economic model for the project:</p> <p>(D) the proposed duration of the proposed mining permit:</p> <p>(E) decommissioning plans:</p>		
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	<p>(j) if the proposed approvals include a mining permit for minerals other than petroleum,—</p> <p>(i) a map of the area over which the mining permit application is intended to be made, the area in which the surrender of an exploration permit or existing privileges is proposed (which must be same area as the area over which the mining permit application is intended to be made), and the extent of the resource and reserves to which the development plan relates:</p> <p>(ii) for minerals other than gold or silver, a report or statement confirming the ownership of the minerals targeted:</p> <p>(iii) whether the application will be for a Tier 1 or Tier 2 permit:</p> <p>(iv) an estimate of the mineral resources and reserves relating to the project, including a summary on acquisition of the data and the data underpinning the estimate (such as information on sample locations, grade, and geology):</p> <p>(v) an indicative mine plan:</p> <p>(vi) a high-level overview of the following:</p> <p>(A) the proposed mining method:</p>		
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	<p>(B) the proposed date for the commencement of mining and estimated annual production:</p> <p>(C) the economic model for the project:</p> <p>(D) the status of or anticipated timing for completing any prefeasibility or feasibility studies:</p> <p>(E) the proposed methods for processing mined material and handling and treating waste:</p> <p>(F) anticipated plans for mine closure and rehabilitation.</p> <p>(2) For the purpose of subclause (1)(j)(iv), for a Tier 1 permit application the resources and reserves relating to the project are to be estimated in accordance with a recognised reporting code such as JORC or NI 43-101.</p>		
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## Appendix 2: Consultation Summary

The following agencies were consulted with to inform the assessment of the application for completeness. Each agency was requested to confirm whether the application documentation provided by the EPA regarding the proposal as provided by the applicant meets the requirements of sections 42 and 43 of the Act and is provided in sufficient detail to satisfy the purpose of the Act in accordance with section 44 of the Act.

Waikato Regional Council confirmed that the application meets the requirements sections 42, 43 and 44 of the Act.

Heritage New Zealand Pouhere Taonga confirmed that all archaeological and heritage-related documentation is complete, with no further information required.

DOC confirmed the application largely meets the requirements of sections 42, 43 and 44 of the Act.

Waitomo District Council raised concerns around the application not containing sufficient level of detail to demonstrate how the activity meets the statutory tests for existing use rights, (under section 10 of the RMA).

**1. Consultation with Waikato Regional Council and Waitomo District Council as the relevant consent authorities for the following approvals under the Resource Management Act 1991:**

- Resource consent (section 42(4)(a) of the Act)

### Response from Waikato Regional Council on 4 February 2026

**RE: FTAA-2513-1153 Taharoa Ironsands Limited – Fast-track Approvals Act 2024 – Central and Southern Block Mining Project Application**

In response to your letter dated 28th January 2026, received by the Waikato Regional Council (WRC) on Thursday 29th January 2026, titled ‘Consultation regarding a substantive application under the Fast-track Approvals Act 2024’.

I can confirm that the written notice prepared by the Waikato Regional Council and included within the above application remains accurate as of the date of this letter.

Further, WRC can confirm that the application documents as provided by the applicant meets the requirements of sections 42 and 43 of the Fast Track Approval Act (the Act) for matters that pertain to the Waikato Regional Councils responsibilities and in staff’s opinion has been provided in sufficient detail to satisfy the purpose for which it is required in accordance with section 44 of the Act.

## Response from Waitomo District Council on 4 February 2026

Kia ora,

After reviewing the application, it still relies on existing use rights under section 10 of the Resource Management Act 1991 in relation to both the Operative and Proposed Waitomo District Plan. While we do not disagree that the proposal is likely to meet the section 10 requirements, the application as currently presented does not contain a sufficient level of detail to demonstrate how the activity meets the statutory tests for existing use rights, nor does it clearly establish the baseline effects against which “same or similar” effects can be evaluated.

We would appreciate a more comprehensive assessment that includes:

1. A clear statement of the activity or activities for which existing use rights are claimed, including all components of the operation (e.g., extraction areas, processing, stockpiling, vehicle movements, ancillary works).
2. Evidence that each component of the activity was lawfully established, including:
  - a. the operative plan provisions at the time the activity commenced;
  - b. any resource consents or permits issued; and
  - c. aerial imagery or other evidence confirming the extent and location of the historic activity.
3. A detailed description of the relevant baseline effects as they existed immediately prior to the plan change, including (where relevant) noise, dust, traffic volumes, earthworks extent, discharge characteristics, operating hours, and the spatial footprint of the activity.
4. A robust comparison of effects demonstrating how the current or proposed activity:
  - a. remains the same or similar in character, intensity, and scale to the lawfully established baseline; or
  - b. differs, with justification as to why such differences remain within the scope of section 10.
5. A plan-based analysis confirming whether any parts of the proposal extend beyond the previously established footprint or introduce new effects that fall outside what section 10 can legitimately authorise.

Apologies if this information has already been submitted elsewhere in the application; however, based on my review to date, I have not identified it.

Happy to discuss further.

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**Consultation with the Department of Conservation** as the administering agency for the following Acts:

- A wildlife approval (as defined un clause 1 of Schedule 7 of the Act) (section 42(4)(h) of the Act)

Response from Department of Conservation on 9 February 2026

## Department of Conservation advice for EPA compliance assessment

### Overview

<b>Project name</b>	Central and Southern Block mining
<b>Project applicant</b>	Taharoa Ironsands Ltd
<b>EPA unique ref. no</b>	FTAA-2510-1123
<b>EPA request number</b>	CRM:0139009471
<b>Conservation approval sought</b>	Wildlife approval
<b>EPA request summary</b>	<p>Taharoa Ironsands Limited has lodged a substantive application under the Fast-track Approvals Act 2024 (the Act). The Central and Southern Block Mining Project application relates to continuing existing mineral sand extraction, including land preparation works, constructing a water supply reservoir, extracting ironsand material using dry and wet-mining techniques, processing extracted material, and transporting raw and processed material.</p> <p>The substantive application includes applications for the following approvals that the Department of Conservation (DOC) is the administering agency for under the following Acts:</p> <p><i>Wildlife approval (as defined un clause 1 of Schedule 7 of the Act) (section 42(4)(h) of the Act)</i></p> <p>The EPA must decide whether a substantive application complies with section 46 of the Act, being the completeness and scope assessment prior to referral of a substantive application to an Expert Panel. As part of making its decision, the EPA must consult with DOC as the relevant administering agency for the above listed approval(s) sought.</p>
<b>Date received</b>	28 January 2026
<b>Date due to EPA</b>	5 February 2026

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The purpose of this document is to provide advice to assist the EPA in making its decision whether the application lodged complies with the requirements of section 46(2) of the Act.

The advice covers compliance with the following:

- Information requirements for relevant approvals
- Consultation requirements

The advice also includes further observations of relevance to further processing of the application, for example where further information could be needed for a decision by the panel.

DOC understands that this document will be passed on to the applicant, the Panel Convener and the Panel.

**Compliance with information requirements**

Our detailed assessment of the information requirements for the relevant approval is provided in the attached tables. In summary, DOC’s advice is that the application largely meets the requirements of sections 42, 43 and 44 of the Act.

**Consultation**

Section 43(2) provides that a substantive application for a listed project must contain the information required by, inter alia, section 13(4)(k). This requires a summary of the consultation undertaken with DOC as an administering agency and how the consultation has informed the project. This information is summarised in section 7 of the application documentation.

In terms of pre-lodgement consultation DOC met with the applicant on 25 August 2025 to receive an overview of the proposal. Despite repeated requests to review draft documentation prior to lodgement, TIL never supplied these to DOC. The application was provided to DOC the night of Friday 31 October 2025 with a note stating that it was being lodged that day. TIL did not contact DOC in relation to reloading the application.

DOC was involved with the reconsenting of the site during 2020 to 2024.

**Listed project requirements under section 43(2)**

The table below provides information to assist the EPA in relation to consideration of the matters required for listed projects for a substantive application under section 43(2) of the Act. This section requires additional information for listed projects that would otherwise have been required during the referral process. Where this information duplicates other requirements it will be addressed elsewhere.



Relevant section	Is the information present? Y/N	Application document reference	Is the information provided in sufficient detail? Y/N	Comments
13(4)(j): <ul style="list-style-type: none"> <li>relevant Treaty settlement entities</li> <li>relevant protected customary rights groups and customary marine title groups</li> <li>relevant applicant groups under the Marine and Coastal Area (Takutai Moana) Act 2011:</li> <li>persons with a registered interest in land that may need to be acquired under the Public Works Act 1981</li> </ul>	Y	Section 6 of substantive application document	Y	
13(4)(k) a summary of the consultation undertaken for the purposes of section 29 and any other consultation undertaken on the project with the persons and groups referred to in paragraph (j) and how that consultation has informed the project	Y	Section 7 Appendices Y and Z	Y	DOC met with the applicant on 26 August 2025 to receive an overview of the proposal, however was never provided with draft documentation relating to the Wildlife Approval, so was unable to provide comment on the relevant documentation.
13(4)(l) a list of any Treaty settlements that apply to the project area, and a summary of the relevant principles and provisions in those settlements	Y	s2.6	Y	
13(4)(o) information identifying the parcels of Māori land, marae, and identified wāhi tapu within the project area:	Y	App. D; Table 3.1	Y	
13(4)(m) a description of any processes already undertaken under the Public Works Act 1981 in relation to the project:	N/A	N/A	N/A	DOC is not aware of any Public Works Act processes associated with this site.
13(4)(u) whether any activities that are involved in the project, or are substantially the same as those involved in the project, have been the subject of an application or a decision under a specified Act and,— (i) if an application has been made, details of the application: (ii) if a decision has been made, the outcome of the decision and the reasons for it	Y	s2.8	Y	Commentary relates to RMA approvals only. The applicant does not hold any DOC approvals.
13(4)(x) a summary of compliance or enforcement actions (if any), and the outcome of those actions, taken against the applicant (or if the referral application is lodged by more than 1 person, any of those persons) under a specified Act:	Y	s2.10	Y	The applicant and associated parties have not been convicted of any offences under the Wildlife Act.

## Applications for wildlife approvals

Clause 2 of Schedule 7 outlines the information required in an application for a wildlife approval

Relevant section	Is the information present? Y/N	Application document reference	Is the information provided in sufficient detail? Y/N	Comments
Schedule 7 clause 2(1) - For the purposes of section 43(3)(h), an application for a wildlife approval must include the following information:				
(a) specify the purpose of the proposed activity:	Y	Appendix KK, p1; Lizard Mngmt Plan s2	Y	
(b) 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):	Y	App. KK, p1-2; LMP s3	Y	
(c) include an assessment of the activity and its impacts against the purpose of the Wildlife Act 1953:	Y	App. KK, p2; LMP s4	Y	
(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:	Y	App. KK, p2; LMP s5.1-5.4	Y	Could be clearer which species the authority would cover, i.e., all species named in s5.2, Table 1 or solely copper skink.
(e) outline impacts on threatened, data deficient, and at-risk wildlife species (as defined in the New Zealand Threat Classification System):	Y	LMP s5.4.3	Y	Impacts outlined are largely specific to copper skink. Impacts on other At Risk species identified in s. 5.2, Table 1 have been discussed in a general way.
(f) state how the methods proposed to be used to conduct the actions specified under paragraph	Y	LMP s6	Y	

Relevant section	Is the information present? Y/N	Application document reference	Is the information provided in sufficient detail? Y/N	Comments
(b) will ensure that best practice standards are met:				
(g) describe the methods to be used to safely, efficiently, and humanely catch, hold, or kill the animals and identify relevant animal ethics processes:	Y	LMP s6.4.3-6.4.5	Y	
(h) state the location or locations in which the activity will be carried out, including a map (and GPS co-ordinates if available):	Y	LMP 3.2	Y	
(i) state whether authorisation is sought to temporarily hold or relocate wildlife:	Y	App. KK, p3; LMP s2	Y	
(j) list 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:	Y	LMP s5.4.3-5.4.4	Y	As above; 5.4.3 is primarily specific to copper skink. Limited information has been provided with regard to other possible species present.
(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):	Y	LMP s6.3-6.5	Y	Compensation is described as going to "a local environmental group" who will be determined through consultation with stakeholders and mana whenua. DOC's preference would be to have an environmental group specified rather than leaving it open as it currently is.
(l) state whether the applicant or any company director, trustee, partner, or anyone else involved	Y	App. KK, p3	Y	The applicant and associated parties have not been convicted of any offences under the Wildlife Act.

Relevant section	Is the information present? Y/N	Application document reference	Is the information provided in sufficient detail? Y/N	Comments
with the application has been convicted of any offence under the Wildlife Act 1953:				
(m) state 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 1953 pending before a court:	Y	App. KK, p3	Y	The applicant and associated parties have not been convicted of any offences under the Wildlife Act.
(n) provide proof and details of all consultation, including with hapū or iwi, on the application specific to wildlife impacts:	Y	App. Y and Z	Y	
(o) provide any additional written expert views, advice, or opinions the applicant has obtained concerning their proposal.	Y	App. M	Y	

**Consultation with Heritage New Zealand Pouhere Taonga** as the administering agency for the following Acts:

- an archaeological authority described in section 44(a) or (b) of the Heritage New Zealand Pouhere Taonga Act 2014

## Response from Heritage New Zealand Pouhere Taonga on 5 February 2026



HERITAGE NEW ZEALAND  
POUHERE TAONGA



### **Competing Interests and Completeness check for project under the Fast Track Approvals Act 2024**

Central and Southern Block Mining, FTAA-2512-1153

Contact Details			
Organisation Name	Heritage New Zealand Pouhere Taonga (HNZPT)		
Contact person	Ben Henson		
Contact Number		Alternative	
Email	<a href="mailto:fasttrack@heritage.org.nz">fasttrack@heritage.org.nz</a>		

#### **Introduction**

1. On 26 January 2026, Taharoa Ironsands Limited (the Applicant) lodged a substantive application for Central and Southern Block Mining (the Project) with the Environmental Protection Agency (EPA).
2. On 28 January 2026 the EPA requested feedback regarding completeness to determine whether the substantive application complies with section 46(2) of the FTA Act.
3. HNZPT has also undertaken a check for competing applications to assist in determining if there are any competing applications or existing resource consents under section 47 of the FTA Act.

#### **Completeness Check**

4. HNZPT confirms that all documentation has been provided that is required for an archaeological authority application.

#### **Competing Interests Check**

5. HNZPT confirms that there are no current competing archaeological authority applications under the Heritage New Zealand Pouhere Taonga 2014 Act that relate to the same activity and site.