

BEFORE THE PANEL CONVENER

IN THE MATTER of the Fast-track Approvals Act 2024 (**FTAA**)

AND

IN THE MATTER of an application by Taharoa Ironsands Ltd under section 42 of the FTAA for the Central and Southern Mining Block

APPLICATION NO. FTAA-2512-1153

**MEMORANDUM ON BEHALF OF THE DIRECTOR-GENERAL OF
CONSERVATION IN RESPONSE TO MINUTE 1 OF THE PANEL CONVENER -
CONVENER'S CONFERENCE 19 March 2026**

18 March 2026

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Introduction

1. This memorandum has been prepared on behalf of the Director-General of Conservation (D-G) by the Department of Conservation (DOC). It responds to a minute of the Panel Convener dated 13 March 2026 in respect of the Central and Southern Mining Block project (the “Minute”).
2. The Minute refers to the upcoming conference, the purpose of which is to gather participant views that will inform decisions of the Convener regarding:
 - a) The appointment of panel members.
 - b) The timing of the panel decision.
3. This memorandum addresses the matters identified in Schedule 1 of the Minute, as relevant to the two decisions required of the Panel Convener set out at paragraph 2 of the Minute.
4. The memorandum focuses on the approval sought under section 42(4)(h), being a wildlife approval as defined in Clause 1 of Schedule 7, for which the D-G is the administering agency. As a relevant administering agency, the D-G will also be invited to provide comments on the application under section 53. The focus of those comments will be the resource consent approval component of the application. To the extent that it may assist the Panel Convener, this memorandum also provides DOC’s assessment on the resource consent approvals as relevant to the D-G’s interests.
5. The D-G’s representative will attend the conference.

Complexity and principal issues*Wildlife approval*

6. DOC considers that the wildlife approval component of this project is of low complexity.
7. Principal issues that remain to be worked through from DOC’s perspective include the following:
 - i. Clarification from the applicant as to the species for which approval is sought as this varies throughout the application;
 - ii. The applicant did not propose draft conditions for the wildlife approval as part of the application. DOC will therefore prepare draft conditions, with the aim of seeking feedback from the applicant on the proposed conditions prior to finalising the section 51 report;

- iii. Some discrete issues in the draft Lizard Management Plan. DOC anticipates these matters will be able to be addressed through amendments to the draft management plan and/or conditions.

Resource consent approvals

- 8. The applicant has applied for a range of resource consent approvals. As not all aspects of these approvals are relevant to the D-G's interests, DOC is not in a position to advise the Convener about the complexity of the resource consent component of the Project overall.
- 9. In terms of the D-G's interests, DOC considers that the principal issues in contention for the resource consent component are likely to be effects of the activity on hydrology, wetlands, freshwater ecology, offsetting and avifauna (in particular Australasian Bittern, Threatened - Nationally Critical). These issues largely align with the areas that were the focus of the D-G's submission in the earlier RMA re-consenting process. DOC's technical advisors are continuing to assess the application with a view to narrowing the issues that remain outstanding from DOC's perspective, and identifying any new issues arising from the expanded scope of the FTAA application as compared to the RMA process.
- 10. In terms of the issues relevant to the D-G's interests in the resource consent component of the Project, DOC assesses the complexity to be moderate.

Appointment of panel members

- 11. In light of the matters identified above, DOC considers it is appropriate that the Panel Convener appoints a panel that includes expertise in freshwater ecology, albeit recognising that the panel would be guided by reports and advice from the D-G and others.
- 12. An understanding of effects on wildlife and biodiversity values that would be required to assess resource consent issues associated with this project is likely to be sufficient to enable appropriate decision making on the wildlife approval.
- 13. In terms of the D-G's interests, appointing more than the default number of panel members is not required. DOC recognises that matters outside of the D-G's interests may warrant appointment of additional members.

Timing of panel decision

- 14. DOC agrees that the relevant matters for setting an appropriate time frame for consideration of this Project are the scale, nature, and complexity of the approvals sought, and any other matter raised by the application.

15. DOC considers that the default time frame would be sufficient for the wildlife approval component of this Project, as it is of low legal, evidential and factual complexity.
16. It is expected, however, that additional time will be required for the resource consent component of the application. DOC considers that specific advice around timeframes needed to decide on the resource consent elements of the Project will need to be provided by other attendees of the conference. However, DOC notes the following:
 - i. Given the breadth of technical issues involved with the resource consent approvals, DOC considers that it is likely this application will benefit from expert conferencing once issues in contention have been identified.
 - ii. DOC recommends that the timeframe accommodate any other procedural steps that may be necessary, such as additional information requests by the panel under section 67 of the FTAA. DOC considers that exactly what procedural steps will be necessary and appropriate will need to be determined by the panel once the key issues have crystallised but notes that it is unlikely a hearing would be required on the wildlife approval component of this Project.

Conclusion

17. The D-G's representative will be happy to elaborate further on any of the above points at the conference set for 11:30 am on Thursday 19 March 2026.
18. DOC confirms willingness to engage directly with the applicant and panel as necessary to advance the progress of the application.

Amy Robinson
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