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BT Mining Limited

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15 September 2026

**Attention: Campbell Robertson**

**Re: Buller Plateaux Continuation Project – Fast Track Approvals Act (2024) FTAA-2608-1279. Section 51 Request for Further Information in relation to Wildlife Authority Act Approval.**

## Introduction

This letter addresses portions of the Request for Further Information provided to BT Mining Limited dated 11 September 2026 in relation to the Buller Plateaux Continuation Fast Track Approvals Act application. Specifically, the sections below address queries from the Department of Conservation (DOC) relating to Helms's Stag Beetle (*Geordorcus helmsi*) and other invertebrates.

## Schedule 7, clause 2(1)(d)

DOC's query regarding Schedule 7, clause 2(1)(d) was:

> *Aside from Powelliphanta, two species of protected invertebrates are known to exist in the Denniston Plateau: Helm's stag beetle (Geordorcus helmsi) and giant wētā (Deinacrida broughi). Wildlife approval is sought for Helm's stag beetle. Numbers affected are not identified.*
>
> *We note that you have not applied for a wildlife approval to cover giant wētā and are not asking for clarification on that component of DOC's commentary. Helm's stag beetle has been listed in Schedule 4 of document A.11.A as a protected terrestrial invertebrate species that is to be covered by the wildlife approval sought.*
>
> *Could you please provide a statement as to the likely species and numbers of protected terrestrial invertebrates known or predicted to be in the area. Alternatively, please provide a statement of why numbers of protected wildlife present and/or numbers of likely impacted protected species cannot be provided.*

No Helms's stag beetle have been recorded on the Buller Plateaux since 1972 despite surveys that should have detected them if they were present. On the basis of that one historical record (detailed below), Helms's stag beetle was included in the Wildlife Act Authority application as a precautionary measure in case any more were discovered. Given the paucity of records, it is impossible to estimate how many beetles might be affected.

Three specimens Helms's stag beetle were at Fletchers Creek on the Denniston Plateau in 1972 by John Charles Watt (GBIF 2026). Helms's stag beetle have also been recorded at Te

Kuha (at the southern limit of the Ngakawau Ecological District) where Patrick (2017) considered there was an important population.

We are not aware of any surveys since 1972 that have detected Helms's stag beetle on the Buller Plateaux. We have identified eight studies which we consider used methods suitable for detecting this species (pitfall traps, litter searches, hand searches for lizards and the like). None of them have reported the presence of Helms's stag beetle. On that basis, as noted above, Helms's stag beetle has been assumed to be present on the Buller Plateaux as a precautionary measure to allow relocation of any individuals (via VDT) or salvage and relocation of any individuals (in the event that any are detected) if required.

The surveys we identified include the Denniston "bioblitz', performed by Forest and Bird in 2012 (Brooks 2012), and others summarised in Ecological Solutions Limited (2026a).

More recent surveys of rehabilitated areas and the three individual Project sub-areas of the Buller Plateaux Continuation Project by Ecological Solutions Limited also failed to detect Helms's stag beetle. These surveys are described in Ecological Solutions Limited (2026b) and Ecological Solutions Limited (2026c, d and e) respectively.

Dr Matt Baber (Alliance Ecology Limited) has spent at least 380 person hours manually searching for lizards on the Buller Plateaux. Though not with the specific intent of collecting Helms's stag beetle, the methods to manually search for terrestrial skinks are also applicable to identifying large poorly mobile invertebrates (e.g., overturning rocks and logs). No Helms's stag beetle were identified during these surveys (M. Baber, pers. comm. 2026).

These surveys, and the earlier ones described in Ecological Solutions Limited (2026a), used methods appropriate to detect the presence of Helms's stag beetle and were applied over a large geographic area, including the Denniston Plateau where the only known records are. None have been detected.

As previously stated, Helms's stag beetle has been assumed to be present on the Buller Plateaux as a precautionary measure. Given the lack of recent evidence, if Helms's stag beetle is present, it is likely to occur in very low numbers, at very low density, and/or has an extremely localised distribution, all of which make detection highly unlikely. On that basis, it is not possible to reliably estimate the number of individuals affected. Realistically, this number is likely to be zero, or close to zero.

In relation to the giant wētā (*Deinacrida broughi*) raised in the response, we are not aware of any current wētā species with this name. The West Coast tree wētā (*Hemideina broughi*) was originally described as *D. broughi*, but the taxonomy was revised in either 1896 or 1900 and the name *H. broughi* has been in use since that time. All giant wētā (*Deinacrida* spp.) are protected by the Wildlife Act (1953). Only *Hemideina ricta* (the Banks Peninsula tree wētā) is listed in Schedule 7. No Banks Peninsula tree wētā have been detected at the Buller Plateaux and the Wildlife Act is assumed not to apply to *H. broughi*.

### Schedule 7, clause 2(1)(g)

DOC's query regarding Schedule 7, clause 2(1)(g) was:

> *During consultation on section 46, DOC has raised an issue with the information provided to satisfy this clause. Namely:*
>
> *"Snails: The application describes methods for hand salvage, temporary holding, handling, transport and release, but does not provide enough information on animal ethics processes. Information is missing on ethics considerations for permanently marking a large proportion of the surviving population for capture-mark-recapture (CMR) monitoring. Information is also missing on ethics considerations for the large number of snails expected to be killed and not salvaged by hand or VDT.*

*Other Invertebrates: The application does not describe how terrestrial invertebrates (other than snails) will be managed except potential transfer by VDT. There is no mention of invertebrates (other than snails) in the Wildlife Act authorisation Technical Report (Feb 2026)."*

*To assist us in assessing if the application complies with s 46(2) of the Act, please provide any further information on the above matters identified by DOC. In particular we request a statement on how clause 2(1)(g) of Schedule 7 has been satisfied in relation to protected invertebrates.*

Management of Helms's stag beetles is described below.

## Schedule 7, clause 2(1)(k)

DOC's query regarding Schedule 7, clause 2(1)(k) was:

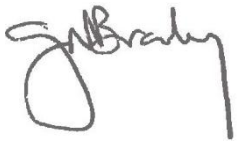
*We note that you include on page 46 of A.11 that "Any Helm's Stag Beetles found during works will also be captured and relocated via VDT to appropriate translocation sites." We have been unable to locate methods of relocation and/or any methods that will be used to avoid and minimise adverse effects identified under clause 2(1)(j) for Helm's Stag Beetles.*

*Could an application reference to this information or a statement on the methods used to avoid and minimise any effects identified for Helm's Stag Beetles be provided.*

Any Helms's stag beetles found will be captured by hand by workers with clean hands free of contaminants, such as fuel and placed into individual containers. These containers will contain damp vegetation, sourced from the location where the beetle was collected. Containers will have suitable air holes that do not facilitate escape. Helms's stag beetles will be transferred to the pest exclusion fenced areas closest to where they were collected as soon as practicable. However, if a large number of Helms's stag beetles are collected and artificial competition would likely be created by adding all the beetles to the same pest exclusion fenced area, then consideration to alternative release sites will be given. All Helms's stag beetles will be released on the same day they are captured.

Any incidental discovery of a Helms's stag beetle will trigger a survey led by a suitably qualified and experienced ecologist. This will involve a (dry) pitfall trapping or hand-search survey of vegetation immediately surrounding the capture location. If a population of Helms's stag beetle is identified, consideration will be given to appropriate implementation of avoidance and minimisation management actions to protect them. As a minimum, any Helms's stag beetles encountered will be relocated appropriately, and surveys will continue until a suitably qualified and experienced ecologist is satisfied that continued surveying will yield no more beetles.

Ngā mihi



**Dr Gary Bramley**
**Ecologist**

## References


Brooks, D. 2012. Secret Life of Denniston. Forest and Bird 344: 22 – 25.

Ecological Solutions Limited 2026a. Buller Plateaux Contextual Study. Prepared for Bathurst Resources Limited

Ecological Solutions Limited 2026b. Assessment of Rehabilitation Outcomes. Prepared for Bathurst Resources Limited

Ecological Solutions Limited 2026c. Buller Plateaux Continuation Project: Escarpment Extended Project Sub-Area Baseline Surveys. Prepared for Bathurst Resources Limited

Ecological Solutions Limited 2026d. Buller Plateaux Continuation Project: Mt Frederick South Project Sub-Area Baseline Surveys. Prepared for Bathurst Resources Limited

Ecological Solutions Limited 2026e. Buller Plateaux Continuation Project: Upper Waimangaroa Haul Road Project Sub-Area Baseline Surveys. Prepared for Bathurst Resources Limited

GBIF.org (15 September 2026) GBIF Occurrence Download https://doi.org/10.15468/dl.b3tsek

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