



19 June 2026

By [Email: substantive@fasttrack.govt](mailto:substantive@fasttrack.govt)

Expert Panel
Central and Southern Blocks Mining Project
Private Bag 63002
Wellington 6140

Teena koutou

The Proprietors of Taharoa C Block Incorporated's response to comments on the Central and Southern Blocks Mining Project (FTAA-2512-1153)

1. This letter is provided on behalf of the Committee of Management (**Committee**) of the Proprietors of Taharoa C Block Incorporated (**Taharoa C**). The Committee administers Taharoa C Block (**whenua**), being the Māori freehold land on which the Taharoa Ironsands Mine (**Mine**) is located.
2. The Committee has reviewed the comments and feedback provided by other parties and submits this further letter in support of the proposed Central and Southern Blocks Mining Project (**Project**).
3. The purpose of this letter is to address additional matters arising from the comments of third parties that is not addressed in our comments on the application.
4. The Committee wish to reiterate the importance of Taharoa C's voice in this overall process. There is limited direct reference to Taharoa C in the comments received, but as the landowner it is important that Taharoa C's perspective is recognised and considered.
5. Taharoa C and its shareholders are the underlying landowner of the Mine and party to the current lease with Taharoa Ironsands Limited (**TIL**). We affirm the lease and the relationship with TIL created by it.
6. We hold mana motuhake in relation to the whenua and must be consulted directly on the Fast-Track Application and activities generally affecting the whenua. Mana motuhake requires recognition that as landowners, Taharoa C have authority over what happens on the whenua. Our tuupuna were responsible for the whenua before there was mining, we are responsible now and we will continue to be responsible beyond any mining activities. As previously stated Taharoa C support mining, so long as it is done in the right way.
7. We acknowledge and respect the mandate of mana whenua to speak to matters that pertain to mana whenua and to restate that we do not speak on their behalf. We note that there are a large number of shareholders of Taharoa C, many who whakapapa to the local Marae and hapuu. The Committee acknowledges that members of the local Marae and hapuu hold a range of views in in respect of the Project.

8. However, Taharoa C has the mandate to determine matters relating to the whenua and the Lease, noting that this mandate has existed since 1971. Accordingly, comments made by Taharoa C have been made from the perspective as the landowner in the exercise of mana motuhake. Taharoa C supports the increased role of mana whenua in regards to the mining activity however given our role as landowner, we believe that there needs to be a collective approach.
9. While engagement by TIL with mana whenua is important, our view is that direct engagement from TIL with Taharoa C as the landowner is also essential and should continue.
10. In relation to specific matters raised, we provide the following additional comments:
 - (a) **Operation of the mine** - As noted in our comments on the Application, Taharoa C has held an active commercial relationship with the mining operations for more than 50 years. Under its current ownership and management, TIL has proven to be a credible and skilled operator of the Mine. The relationship has proven to be stable and economically successful. We welcome continuing the relationship.
 - (b) **Archaeological matters** - Taharoa C notes the longstanding practice whereby kaumātua recognised by Taharoa C have taken responsibility for assisting with tikanga, kawa and the management of any archaeological discoveries. This is an established practice that TIL has respected, and we understand it seeks to continue. Taharoa C considers that the exercise of mana motuhake should also be recognised in the context of archaeological finds which recognises the ability of Taharoa C to engage with kaumātua representatives and to lead any tikanga processes on its whenua as appropriate.
 - (c) **Mining footprint** - The lease with TIL enables the whenua to be mined in its entirety and there is a long history of mining throughout the Central and Southern Blocks, and more recently in the Northern Block – this includes reworking areas in both blocks as technology has developed, where valuable material had been left behind. This has not changed since the lease was signed. We understand that TIL will address the comments in relation to proposed setbacks and impacts on adjoining landowners.
 - (d) **Employment** – Taharoa C wishes to note TIL’s commitment under the Lease, in that so far as possible, TIL is to draw its labour force from the Taharoa community and the previous comments made in this respect. The Committee understands from TIL that employment remains the same for those who whakapapa to Ngāti Mahuta.
 - (e) **Kaitiakitanga** – The proposed conditions of consent provide for ongoing engagement with mana whenua and Taharoa C. The Environmental Management Plan will also seek to facilitate ongoing engagement, information sharing, and incorporation of maatauranga Maaori and cultural health indicators. These mechanisms provide for more involvement of mana whenua and Taharoa C in consent processes than there has been in the past and include:
 - (i) Annual meetings with stakeholders (including Taharoa C and mana whenua groups) regarding resource consent management matters relating to the Mine. Monitoring information will be available at these meetings.
 - (ii) A Consultation Register to record annual consultation updates.
 - (iii) A provision to provide for a publicly accessible website that includes the current Annual Works Plan, the Environmental Management Plan, Annual Monitoring Reports and monthly records of:
 - (A) water abstraction;

- (B) lake levels and rainfall data;
- (C) monthly stormwater discharge records; and
- (D) dust monitoring data.
- (iv) The website must also include information on procedures for managing complaints.
- (v) Annual Monitoring Reports to be provided to the following entities:
 - (A) Waikato Regional Council;
 - (B) Taharoa C;
 - (C) Taharoa Lake Trustees;
 - (D) Te Ruunanga o Ngaati Mahuta ki te Hauaaauru;
 - (E) Te Kooraha Marae; and
 - (F) Aaruka Marae

(together the **Key Stakeholders**)

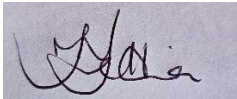
- (vi) Ongoing consultation during the development and any material amendments of the
- (vii) Environmental Management Plan with the following entities:
 - (A) Department of Conservation; and
 - (B) the Key Stakeholders.
- (viii) A requirement that the Environmental Management Plan must incorporate mātauranga Māori and cultural health indicators.
- (ix) A requirement that the Conceptual Site Closure Plan includes measures to protect existing Māori reserves and ensure access for customary cultural practices is not prevented in the long term.
- (x) A requirement for the consent holder to review and update the existing Wainui Stream Enhancement Plan to improve indigenous biodiversity values in the lower Wainui Stream in consultation with the Key Stakeholders.
- (xi) A requirement for a fish pass monitoring programme to be developed in consultation with the Department of Conservation and the Key Stakeholders to ensure the effectiveness for juvenile fish species, with regular reporting. It will be lodged with the Waikato Regional Council within six months of the commencement of the resource consent for written approval by the Waikato Regional Council acting in a technical certification capacity.
- (xii) A review condition if there were effects of concern in the future that had not been appropriately managed by the consent conditions (including cultural effects).

11. Taharoa C are also mindful of the commitments TIL has made to Taharoa C that the mining operation will be undertaken by the most approved method, there will be no unnecessary damage or waste to the whenua in undertaking the activities. We understand that the whenua will be returned in a good

state and condition and all possible precautions will be undertaken to prevent damage to historical places and areas. There will also be ongoing consultation to be undertaken prior to interfering with any stream or creek on the whenua, with a view to safeguarding fishing and associated rights.

12. The Mine has formed part of the historical and current use of the whenua and is expected to remain part of its foreseeable future use. For more than 50 years, the Mine has enabled Taharoa C to build an economic base to support its people.
13. As stated above, Taharoa C and its shareholders hold mana motuhake in relation to the whenua and must be consulted directly on the Fast-Track Application and activities generally affecting the whenua. Mana motuhake requires recognition that as landowners, Taharoa C have authority over what happens on the whenua. Our tuupuna were responsible for the whenua before there was mining, we are responsible now and we will continue to be responsible beyond any mining activities. As previously stated Taharoa C support mining, so long as it is done in the right way.

Naaku noa, naa

A handwritten signature in dark ink, appearing to be 'W. H. H.', is written on a light-colored rectangular background.

Deputy Chair, on behalf of Committee of Management of the Proprietors of Taharoa C Block Incorporated