

Appendix F

Summary of Consultation

Contents

1.	General summary of consultation	2
1.1	Background	2
1.2	Paetae Kotahitanga ki Te Tai Poutini and Mana Whakahono ā Rohe	3
2.	Fast-track Project Consultation	3
3.	Consultation with community and neighbouring properties.....	4
3.1	Overview	4
3.2	General feedback themes	4
4.	Consultation with relevant parties (Iwi, Councils and administering agencies).....	7
4.1	Overview	7
4.2	Iwi, Councils and administering agencies summaries.....	7
5.	Other consultation	12
6.	How consultation informed the Project	12
7.	Council s30 responses.....	15
8.	Archaeological Authority consultation requirements.....	16
	Schedule 1.....	17
	Schedule 2.....	18
	Schedule 3.....	23

Memo – Ecological Solutions - Response to feedback from consultation with the Department of Conservation

1. General summary of consultation

1.1 Background

Tāiko Critical Minerals Limited (**Tāiko**) has undertaken extensive consultation with mana whenua, community, regulatory agencies and other stakeholders throughout the development of its Critical Minerals Project since 2018. Engagement has included public meetings, drop-in sessions, one-on-one meetings, and ongoing discussions with agencies and mana whenua.

In support of the Barrytown Minerals Project (the **Project**), Tāiko has compiled a substantial body of environmental information, including drilling investigations, site testing and laboratory analysis. Tāiko also holds a suite of resource consents (refer **Appendix H2 – H4**) authorising mining activities within the area north of Canoe Creek (referred to as the Central Block), on-site processing to produce heavy mineral concentrate (HMC), and transport of HMC via State Highway 6 to the Rapahoe Minerals Separation Plant (MSP) where the concentrate is refined into export-grade products. In addition, Tāiko also holds mineral permits and long-term infrastructure access arrangements. Tāiko has Sale and Purchase arrangements and access agreements for the farmland proposed to be mined within the Southern Block Project. All of these arrangements have required consultation and engagement with various stakeholders.

The previous consenting processes involved extensive public consultation and technical assessment, including consideration of lighting, transport, noise, radiation, dust, water management, amenity and landscape effects, and ecological impacts. These matters were subject to detailed technical reporting, peer review and ultimately, the granting of resource consent through a Consent Order in the Environment Court in October 2024 (refer **Appendix H2**).

Feedback received through submissions and stakeholder engagement for the resource consents already obtained informed refinements to the Project and the development of consent conditions. Amendments included restrictions relating to lighting, hours of operation, transportation and other operational matters. These conditions are existing and are known to the relevant Councils, iwi, the Department of Conservation (DOC) and other agencies involved in the Project.

The technical information and consultation undertaken through earlier consenting processes have informed the current Fast-track application for this stage of the Project, the **Southern Block Project**. Tāiko has continued to undertake targeted environmental investigations and obtain specialist technical advice to ensure the proposal reflects both previous consultation outcomes and updated environmental assessments. Where existing conditions are equally relevant to the Southern Block Project, they have been proposed.

Many of the technical experts engaged for the Southern Block Project were also involved in earlier consenting processes and therefore have a detailed understanding of the site, the Project and the issues previously raised by stakeholders and the community. This work has also informed the

recently granted consents relating to the Southern Block Wet Concentrator Plant (WCP) and the MSP at Rapahoe (**refer Appendix H3 and H4**).

1.2 Paetae Kotahitanga ki Te Tai Poutini and Mana Whakahono ā Rohe

The Paetae Kotahitanga ki Te Tai Poutini (Partnership Protocol) and Mana Whakahono a Rohe (Resource Management Act Iwi Participation Arrangement), signed at Arahura Marae on 22 October 2020, formalises the collaborative relationship between Te Rūnanga o Ngāti Waewae, Te Rūnanga o Makaawhio, Te Rūnanga o Ngāi Tahu (collectively referred to as Poutini Ngāi Tahu) and the West Coast Regional Council. The Arrangement recognises the partnership between Council and Poutini Ngāi Tahu and provides a framework for iwi participation in resource management processes under the Resource Management Act.

In preparing and assessing the Project, Tāiko has recognised and applied the principles underpinning this Arrangement through ongoing engagement with Te Rūnanga o Ngāti Waewae, provision of technical information, involvement of iwi in discussions relating to environmental management, and consideration of cultural values and outcomes within the proposed conditions and management plans included in the Application.

2. Fast-track Project Consultation

Tāiko has adopted a consultation approach for the Southern Block Project that is consistent with the engagement undertaken during the publicly notified consenting process for the Central Block.

Consultation and engagement relating to the Southern Block commenced in early 2025 and initially included all components of the wider Critical Minerals Project, including the proposed WCP, associated access arrangements and mining activities. Subsequently, Tāiko elected to separate the WCP and access road components and seek resource consent for those activities through standalone RMA consenting processes with the West Coast Regional Council and Grey District Council to ensure Stage one of the Project could commence. These applications have now been granted resource consents with unlimited terms.

As a result, much of the feedback received during the consultation undertaken during the early stages of engagement related to the proposed WCP and associated access arrangements rather than the mining activities themselves. Separating the Project into its key components has enabled Tāiko to undertake consultation in a more targeted manner while progressing the mining component through the Fast-track approvals process.

Engagement methods have included public drop-in sessions, one-on-one meetings, group discussions, information sharing via email, letterbox drops, in-person discussions, and updates provided through the company's website and Facebook page. Tāiko has also made itself available to meet directly with any individual wishing to discuss the Project and Southern Block Project, with this opportunity taken up by a number of landowners and interested parties.

3. Consultation with community and neighbouring properties

3.1 Overview

As noted above, Tāiko has adopted a consultation approach for the Southern Block Project that is consistent with the engagement undertaken during the publicly notified consenting process for the Central Block.

Engagement methods undertaken are outlined in section 2 of this Consultation Summary. Additional information is included below.

In June 2025, Tāiko undertook a letterbox drop to landowners adjoining the Southern Block, providing an overview of the proposed activities for the Southern Block Project and inviting recipients to discuss any matters of concern directly with the company. Tāiko also held public drop-in sessions at Barrytown Hall on 16 and 17 July 2025, attended by approximately 140 residents from the wider Barrytown Flats area across the two evenings. These sessions provided an opportunity for attendees to review maps, technical material and other information relating to the proposal, and to discuss the Project directly with company representatives and technical experts. Discussions covered a broad range of topics, including matters previously considered through the Central Block consenting process north of Canoe Creek. Additional information was provided where requested, and Tāiko facilitated one-on-one meetings with attendees seeking further discussion.

This engagement process resulted in ongoing discussions with neighbouring landowners and members of the wider community. In response to matters raised, Tāiko has refined aspects of the Project where practicable and committed to a range of additional measures outside the formal approvals process for certain neighbouring properties. These include improvements to State Highway access safety, additional landscaping and bunding, and opportunities for adjacent landowners to provide input into planting design where it may affect their outlook or amenity values.

Community members have also acknowledged the proposed \$8 million upgrade to the electricity network servicing Barrytown and Punakaiki, which will improve resilience and reliability for the wider community. This upgrade will be facilitated and funded by Tāiko as part of the Central Block consenting process. Together with the proposed environmental rehabilitation works and support for Barrytown School, these initiatives have generally been viewed positively by members of the community.

3.2 General feedback themes

The following themes were consistently raised during consultation with neighbouring landowners. In many cases, the concerns related primarily to the WCP and access arrangements rather than the mining component itself. Nevertheless, Tāiko has continually sought to address these matters through project design, technical assessment and proposed management measures for all aspects of the Project.

Tāiko will continue to maintain relationships with neighbouring properties and provide information required under its resource consents, together with additional monitoring data and project information where requested, as part of its commitment to operating as a responsible neighbour.

- Noise –

Noise effects have been assessed through detailed acoustic modelling. The modelling demonstrated that the WCP will comply with the relevant permitted activity noise standards. In relation to mining activities within the Southern Block, the detailed modelling (refer **Appendix L7**) has informed operational parameters and proposed consent conditions (refer **Appendix P1 Condition 11.0, 12.0 and 16.1-16.2**) applicable when mining occurs within 500m of dwellings located at Lot 2 DP2178, 23, 37, 41, 43, and 50 Warren Road, and 64, 67, 86 and 101 Cargill Road, noise monitoring at property boundaries and the use of bunding to minimise noise effects.

Existing background noise sources in the area are notable and include State Highway 6, the Tasman Sea and general rural activities.

- Traffic –

Traffic effects have been comprehensively assessed and are addressed through existing resource consents. Having the WCP on the Southern Block reduces the haul distance to the Mineral Separation Plant at Rapahoe compared with the previously authorised arrangement.

Notwithstanding that traffic effects have already been assessed and authorised, Tāiko has continued to engage with neighbouring landowners and Barrytown School regarding traffic-related matters. Landowners acknowledged that sealing the access road and proposed landscaping and planting will significantly reduce the effects of the activity.

Concerns were also raised regarding limited public access to Pakiroa Beach and informal walking routes along State Highway 6. While these matters are outside Tāiko's direct control, the company has committed to investigating opportunities to safely facilitate pedestrian and recreational access, including walking and horse riding, around active mining areas where practicable. This also includes when mining activities are temporarily taking place on a paper road within the Application area.

- Radiation –

Tāiko has committed to implementing the same radiation monitoring programme required under the previously granted Central Block resource consent (refer **Appendix P1 Conditions 8.4 – 8.6**). In addition, and to provide reassurance to neighbouring landowners, the company may undertake additional boundary monitoring, although this is not proposed in consent conditions and is not considered necessary by the relevant technical experts for the Southern Block (refer **Appendix L8A**).

- Dust –

Feedback was received regarding the potential for dust generation although the majority of this was in relation to the access road which has been authorised as part of the WCP consent. Tāiko considers that dust effects will be effectively managed due to the wet nature of the mined material and the sealing of the site access road. Consistent with its approach to radiation monitoring, the company is prepared to undertake additional monitoring in consultation with concerned landowners, despite such monitoring not being proposed in consent conditions or considered necessary for the Southern Block. Provisions for the management are outlined in the Dust Management Plan (refer **Appendix M5**). This recognises community concerns regarding the strong offshore wind conditions experienced in the area.

- Landscape and visual amenity –

Views of the landscape vary considerably between neighbouring properties. Properties located on the western side of State Highway 6 are generally lower in elevation and therefore have more limited views across the Barrytown Flats. In contrast, elevated properties have expansive views over the wider rural landscape, including State Highway 6, existing farming activities and other rural land uses. A number of landowners identified these rural outlooks and lifestyle values as an important reason for locating in the area. Properties on the eastern side of the highway have also undertaken substantial planting to screen views of the highway and reduce road noise.

Proposed bunding and planting will provide additional screening for properties adjacent to the consent area. Input into specific planting of the bund adjacent to the property have been requested by the owner and occupier at Lot 2 DP2178 and noted in the Landscape Mitigation Package (refer **Appendix M6 3.0 Landscape Mitigation – Pre-Mining Section 1: North of Granite Creek**).

The mining activity is temporary in nature and involves a relatively small operational footprint within a rural environment where such activities are anticipated by the relevant planning framework. The use of an electrically powered floating dredge will further minimise operational noise effects. Tāiko will continue to engage with neighbouring properties throughout the life of the Project and will consider additional practicable measures to further reduce operational effects beyond those already proposed through the consent conditions separate to this process.

Barrytown School

Barrytown School is located at 21 Cargill Road, Barrytown. While the school is not directly adjacent to the proposed mining area, Tāiko has engaged closely with the school to ensure Project operations do not adversely affect school activities or student safety.

Specific transport management measures have been incorporated into the Project to avoid trucking movements during school drop-off and pick-up periods, including avoiding the use of Cargill Road for Project-related transport movements.

In recognition of the limited transport options available to the school for sporting, cultural and other school-related activities, Tāiko donated a 2026 Toyota HiAce in February 2026 to assist with student transportation needs.

Barrytown School has also developed a long-term vision for upgraded facilities and broader community-focused infrastructure. Tāiko has committed to supporting this vision through infrastructure assistance, including the gifting of approximately 1 hectare of adjoining land to facilitate the establishment of an early childhood education centre and associated community facilities.

More broadly, Barrytown has limited opportunities for safe walking and cycling due to the absence of dedicated pedestrian and cycle infrastructure along State Highway 6. In response, Tāiko has committed to supporting the development of a walking and cycling track around the school grounds and adjoining gifted land, providing a safe and accessible recreational space for students and the wider community.

While these initiatives sit outside the scope of the current application, together with the proposed community facilities, these initiatives will further strengthen Barrytown School's role as a community hub and provide amenities that better meet the needs of local families and the wider Barrytown community.

4. Consultation with relevant parties (Iwi, Councils and administering agencies)

4.1 Overview

Consultation has occurred over many years, and consultation letters (not notification letters) were sent to the following parties including copies of information considered relevant to the specific organisation and requesting feedback. This included:

- Te Rūnanga o Ngāti Waewae
- Te Rūnanga o Ngāi Tahu
- Grey District Council
- West Coast Regional Council
- Department of Conservation
- Heritage New Zealand Pouhere Taonga
- Māori Heritage Council / Ministry for Heritage and Culture

A copy of the Consultation Letters are included at **Appendix F2**. A summary of the responses received, and how this has informed the Application, is included below.

4.2 Iwi, Councils and administering agencies summaries

[Te Rūnanga o Ngāti Waewae](#)

Tāiko has developed a longstanding and constructive relationship with Te Rūnanga o Ngāti Waewae (Ngāti Waewae), who hold mana whenua status over the Project and Southern Block Project areas. Engagement has occurred throughout the previous resource consenting processes and has continued in relation to the current Fast-track application for the Southern Block.

Information supplied to Ngāti Waewae on 4 March 2026 included:

- Tāiko Critical Minerals Limited Consultation – Letter to Ngāti Waewae
- Project Summary
- Draft conditions
- Landscape Mitigation Package
- Archaeological Assessment prepared by New Zealand Heritage Properties Ltd

Key matters addressed through consultation have included land use, water management, air quality, ecological values and wider cultural considerations. Tāiko has also made its technical experts available to Ngāti Waewae throughout the process, with a particular focus on water management matters.

Ngāti Waewae has expressed support for the extensive wetland rehabilitation proposed as part of the Project and has engaged with Tāiko regarding opportunities to develop a broader biodiversity enhancement partnership within the wider area. This work is intended to support the restoration and enhancement of habitat for the Westland petrel (tāiko) and other indigenous flora and fauna.

While this broader biodiversity partnership sits outside the scope of the current application, it reflects the established and ongoing relationship between Tāiko and Ngāti Waewae and their shared commitment to environmental stewardship within the wider Barrytown area.

Ngāti Waewae's response to the consultation is included in **Appendix F3**.

Te Rūnanga o Ngāi Tahu

Taiko has had ongoing, albeit to a lesser extent than with Ngāti Waewae, engagement with Te Rūnanga o Ngāi Tahu.

Information supplied to Ngāti Waewae on 4 March 2026 included:

- Tāiko Critical Minerals Limited Consultation – Letter to Ngāi Tahu
- Project Summary
- Draft conditions

Ngāi Tahu have acknowledged that Tāiko has commenced engagement with both Ngāi Tahu and Ngāti Waewae and expressed support for the direct and resourced engagement occurring with Ngāti Waewae, including the development of conditions designed to protect Ngāi Tahu values. **Schedule 1** sets out commentary regarding the matters identified by Ngāi Tahu in Appendix 2 of their response (refer **Appendix F4**).

Based on the information provided, and provided ongoing engagement continues with Ngāti Waewae, Ngāi Tahu have advised that it is unlikely further engagement will be required.

Grey District and West Coast Regional Councils

Tāiko has undertaken extensive engagement with both the Grey District Council and the West Coast Regional Council in relation to the wider Project and the Southern Block subject to the current Fast-track application.

Information supplied to the Grey District Council on 4 March 2026 included:

- Tāiko Critical Minerals Limited Consultation – Letter to Grey District Council
- Project Summary
- Draft conditions
- Landscape Mitigation Package
- Section 30 request

Both Councils have supported Tāiko’s approach of carrying forward, where relevant and practicable, the conditions and management measures developed through earlier consenting processes into the current proposal. Council representatives have undertaken site visits and have been provided with detailed technical information relating to the Southern Block Project.

The proposed conditions have been developed to align with the relevant district and regional planning frameworks and are consistent with conditions imposed on comparable activities within the region. Tāiko considers the proposed conditions to be practical, appropriate and capable of effective implementation and enforcement.

As the activity will take place temporarily across three unformed legal road parcels within the existing farm operations, consideration as to the management of these areas has been undertaken as part of the Southern Block Project and long-term future planning. A licence to occupy for the areas of unformed road reserve subject to mining is agreed to in principle and is in progress. Should a more permanent solution (road stopping be required), Council is satisfied that there is scope for this to occur. Where alternative access is required, a temporary accessway outside the active mining area will be constructed in consultation with the Council and located, where practicable, in proximity to the existing unformed legal road boundary.

The constructed wetland which was to be formed on the eastern boundary of the site was redrawn through the consultation phase to ensure that it does not feature on any paper road area, and there is no long-term impediment to access to the road reserve parcels located at Parcel ID 3702829 (end of the access road before it goes onto private land to Pakiroa Beach) and Parcel ID 3700611 (end of the formed portion of Warren Road to Pakiroa Beach).

Grey District Council’s response to the consultation is included in **Appendix F5**.

Information supplied to the West Coast Regional Council on 4 March 2026 included:

- Tāiko Critical Minerals Limited Consultation – Letter to West Coast Regional Council
- Project Summary
- Draft conditions
- Section 30 request

The West Coast Regional Council provided feedback on the proposed conditions during pre-lodgement discussion. **Schedule 2** provides a detailed summary from Tāiko to the matters raised by the Regional Council. A response to the consultation is included as **Appendix F6**.

Department of Conservation

Tāiko has engaged with the Department of Conservation (DOC) throughout the earlier resource consenting processes and in relation to the current Fast-track proposal for the Southern Block. Engagement with DOC has primarily focused on indigenous flora and fauna values, particularly the protection and management of the Westland petrel (tāiko).

Information supplied to DOC on 18 March 2026 included:

- Tāiko Critical Minerals Limited Consultation – Letter to Department of Conservation
- Project Description
- Draft Conditions
- Draft Wildlife Act Authorisation
- Draft Ecological Assessment
- Draft Avian Management Plan
- Draft Native Freshwater Fish Capture and Relocation Plan
- Draft Lizard Management Plan
- Landscape Mitigation Package

A further package of information was provided to DOC on 30 March 2026 including:

- Statement of Evidence M Fitzpatrick (Water Quality)
- Statement of Evidence R Montgomerie (Freshwater Ecology)
- Statement of Evidence Dr G Bramley (Terrestrial Ecology)
- Draft Conditions – Wildlife Act Authority
- Draft Rehabilitation Plan

Following pre-lodgement consultation, DOC provided feedback on a range of ecological, cultural and operational matters associated with the Southern Block Project. Key matters raised included ongoing engagement with Ngāti Waewae and Ngāi Tahu, management of taonga species, avifauna protection (including Westland tāiko and kororā), lighting controls, water quality, freshwater ecology, water take management, rehabilitation, and the consistency of proposed conditions with

those applying to the Central Block Project. DOC also provided comments on proposed consent conditions, management plans and relevant statutory planning considerations.

A particular focus of DOC's feedback related to lighting effects and ensuring that any lighting associated with the Southern Block Project aligns with the standards and mitigation measures developed through the earlier consenting processes for the Project. In response, Tāiko has proposed the same lighting-related conditions previously agreed for the Central Block and confirmed that mining activities within the Southern Block will occur during daylight hours only. This daylight-only restriction was originally developed in response to DOC's concerns regarding potential effects on the Westland petrel through Environment Court mediation, and was confirmed in the Consent Order. The matters raised by DOC were reviewed by Tāiko and its technical specialists, including Dr Gary Bramley of Ecological Solutions, with amendments and further clarification incorporated into the application documentation and proposed conditions where appropriate. This included updates to proposed lighting conditions, clarification regarding daylight-only operations, revised condition references, and confirmation that existing water take management measures, including cease-take thresholds and minimum flow requirements, will also apply to the Southern Block activities. Tāiko also confirmed ongoing consultation with Ngāti Waewae and noted that broader biodiversity enhancement initiatives, including pest control, wetland rehabilitation and further research relating to the Westland petrel and associated ecological values, are proposed outside the formal consenting framework. Tāiko intends to continue working collaboratively with DOC at both regional and national levels on these initiatives.

DOC's feedback has assisted in refining aspects of the Southern Block Project, while many of the matters raised were already addressed through the existing technical assessments, management plans and proposed consent conditions in anticipation of DOC's concerns based on the previous resource consent processes.

A copy of DOC's response to the consultation letter is included in **Appendix F7. Schedule 3** provides a detailed summary from Taiko to the matters raised by DOC. A memo from G. Bramley (Ecological Solutions) is also attached to this document providing responses to matters raised by DOC.

Heritage New Zealand Pouhere Taonga

Prior to the sending the consultation letter to Heritage New Zealand Pouhere Taonga (NZHPT) there had been limited engagement undertaken.

Information supplied to the NZHPT on 4 March 2026 included:

- Tāiko Critical Minerals Limited Consultation – Letter to NZHPT
- Project Summary
- Archaeological Assessment prepared by New Zealand Heritage Properties Ltd
- Proposed conditions for archaeological approval

There was no feedback received.

Māori Heritage Council / Ministry for Heritage and Culture

Prior to the sending the consultation letter to the Māori Heritage Council there had been no engagement undertaken.

Information supplied to the Māori Heritage Council on 4 March 2026 included:

- Tāiko Critical Minerals Limited Consultation – Letter to Māori Heritage Council
- Project Summary
- Archaeological Assessment prepared by New Zealand Heritage Properties Ltd
- Proposed conditions for archaeological approval

The information was forwarded to the Ministry for Heritage and Culture (the Ministry).

A response was received from the Ministry advising that they had been removed from the administering agency under section 4 which meant that the Ministry is no longer consulted by applicants under section 29. Taiko was strongly encouraged to continue to work closely with Heritage New Zealand Pouhere Taonga for the project. A copy of the correspondence is included as **Appendix F8**.

5. Other consultation

West Coast Penguin Trust

The West Coast Penguin Trust has been engaged in relation to the Project, with a particular focus on the protection and enhancement of little blue penguin populations along the West Coast. Tāiko has incorporated into the Fast-track proposal for the Southern Block Project the same management conditions previously supported through earlier consenting processes. These measures include ecological survey requirements, restrictions on dogs within the site (other than trained penguin detection dogs), and controls limiting access to active mining areas to minimise any potential harm to penguins.

Previous ecological surveys, including a penguin dog survey undertaken in August 2025, did not identify evidence of little blue penguins within the relevant coastal areas. Nevertheless, Tāiko proposes to continue applying a precautionary management approach to ensure the species will not be adversely affected by the Project.

6. How consultation informed the Project

Sections 43(2)(a)(i) and section 13(4)(k)(i)-(ii) of the Act requires the Applicant to summarise the consultation undertaken and how consultation has informed the Project. **Table 1**, summarises the information received throughout the process and contained in **Schedules 1 – 3**.

Table 1: Summary of how consultation has informed the Project

Party Consulted	Summary of consultation	How consultation informed the Project
Relevant Iwi Groups		
Te Rūnanga o Ngāti Waewae	<p>Project overview meeting (10/12/2024).</p> <p>Iwi representative meeting on groundwater, catchment areas, wetland rehabilitation, and accidental discoveries (02/04/2025).</p> <p>Iwi representative meeting on Hydrology Report (08/04/2025).</p> <p>Site visit with Iwi Representative (Susan Aitkin) (03/03/2025).</p> <p>Weekly meetings with Iwi Leader (Francois Tumahai)</p> <p>Formal invitation to consult/ request for cultural advice – project description, maps and proposed conditions provided (04/03/2026)</p>	<p>Wildlife, freshwater quality, stormwater, erosion/sediment, creek reinstatement, land rehabilitation and archaeological values to be managed via Accidental Discovery Protocols.</p> <p>A letter of support is attached as Appendix F3.</p>
Te Rūnanga o Ngāi Tahu	<p>Formal invitation to consult/ request for cultural advice – project description, maps and proposed conditions provided (20/02/2026)</p> <p>Invited to site visit but did not attend (19/03/2026)</p>	<p>Letter recommending ongoing engagement with Ngāti Waewae is attached as Appendix F3.</p>
Councils		
West Coast Regional Council	<p>Initial meeting with WCRC outlined high level project (25/11/24).</p> <p>Update on project scope (01/09/2025).</p> <p>Meeting on process, parties involved, landscape, conditions (16/04/2025).</p> <p>Formal consultation letter outlining the project description, maps, proposed conditions and draft landscape and mitigation packages (04/03/2026).</p>	<p>The conditions offered reflect the level of actual and potential effects, are consistent with the District and Regional Planning framework, and are reflective of existing consent conditions for local activities of a similar nature, as well as being practical and enforceable. Minor edits have been made to include email addresses and clarify conditions for water monitoring.</p> <p>Refer Schedule 2 for a detailed summary.</p>
Grey District Council	<p>Initial meeting with GDC outlined high level project (25/11/2025)</p>	<p>The conditions offered reflect the actual and potential effects, meet the requirements of the District and Regional Planning framework, and</p>

Party Consulted	Summary of consultation	How consultation informed the Project
	<p>Key aspects of project reviewed including noise, landscape and ecology (16/04/2025).</p> <p>Discussion on use of paper road during mining and avoidance of activities on these areas post-mining (April/May 2026).</p> <p>Formal consultation letter outlining the project description, maps, proposed conditions and draft landscape and mitigation packages (04/03/2026)</p>	<p>are reflective of existing conditions for local activities of a similar nature, as well as being practical and enforceable.</p> <p>The footprint of the wetland to be constructed post mining has been amended to avoid locating it on the road reserve.</p>
Administering Agencies		
Department of Conversation	<p>Initial meeting for high level project overview (27/05/2025).</p> <p>Formal consultation letter, project description and proposed condition sent (18/03/2026).</p> <p>Draft Rehabilitation Management Plan, Wildlife Act Authority conditions, and ecology (terrestrial and freshwater) and water quality Statements of Evidence sent (30/03/26).</p>	<p>Updates to consent conditions and management plans have been undertaken including a new condition to initiate further operational requirements for lighting should these be required. Minor edits for clarity and consistency have been made (refer Schedule 3 for a detailed summary).</p>
Heritage New Zealand Pouhere Taonga	Formal consultation letter, project description, Archaeological Report and proposed condition sent (04/03/2026)	No response received.
Māori Heritage Council	Formal consultation letter, project description and proposed condition sent (04/03/2026)	<p>Was forwarded to Ministry for Culture and Heritage (Ministry) who advised they have been removed as an administering agency under s 4 of the FTAA, meaning they are no longer required to be notified. Ministry encouraged notification to New Zealand Pouhere Taonga (HNZPT), which has already been done. Refer Appendix F8.</p>
Other consultation		
West Coast Penguin Trust	Meeting on penguin fencing (27/05/25)	Discussed practical approaches to penguin fencing in the project area.
Barrytown Community and Adjacent Landowners		
Barrytown Community	Community Drop-in Meeting – approx. 145 registered attendees across two nights	Material issues raised managed by consent conditions, management

Party Consulted	Summary of consultation	How consultation informed the Project
	(note some people attended both sessions) (16/07/2025 – 17/07/2025).	plans and commitments outside of this process.
Adjacent Landowners and Occupiers	Mailbox drop of information (June 2025) Community drop-in meetings (16-17/07/2025) One-on-one home visits as requested, emails and phone calls.	<p>A number of matters raised were associated with existing consents for the WCP, access and transport activities. Matters specific to the mining of the Southern Block and have informed the Project are summarised below:</p> <p>Noise and dust will be managed via management plans, including bunding at key locations. Dust monitoring to be undertaken around site perimeter.</p> <p>Expanded planting to soften visual effects and maintain rural amenity (some of this planting is to be undertaken outside of this process and is related to individual properties).</p> <p>Radiation monitoring regime to be implemented around the relocated WCP.</p> <p>Access to Pakiroa Beach will be maintained. Alternative access to be established around active mining areas as required, particularly when mining activity takes place on road reserve.</p>

7. Council s30 responses

Section 30 letters were sent to the Grey District Council and the West Coast Regional Council on 4 March 2026. Both Councils have confirmed that there are no relevant existing resource consents in the Application Area (refer **Appendix F9**).

8. Archaeological Authority consultation requirements

For the purposes of section 43(3)(i), an application for an archaeological authority must include a statement as to whether consultation with tangata whenua, the owner of the relevant land and any other person likely to be affected:

- Has taken place, with details of the consultation, including the names of the parties and the tenor of the views expressed; or
- Has not taken place or been completed, with the reasons why consultation has not occurred or been completed (as applicable).

As summarised above, Ngāti Waewae and Tāiko have developed a strong and enduring relationship, founded on a shared commitment to achieving appropriate environmental and cultural outcomes. This relationship has been built over many years through engagement on the Central Block and has continued to strengthen through the development of the Southern Block Proposal. Ngāti Waewae supports the Barrytown Minerals Project, including the proposed development of the Southern Block (refer **Appendix F3**).

In its letter of response, Ngāti Waewae acknowledge the suggestion by New Zealand Heritage Properties Ltd regarding the preparation of an assessment of Māori values for archaeological sites. Ngāti Waewae was provided with a copy of the Archaeological Assessment (**Appendix L9**) and has advised it does not consider any additional assessment necessary in this instance and is satisfied that the proposal of an Accidental Discovery Protocol provides an appropriate and practical mechanism to manage any such discoveries, consistent with tikanga Māori.

Tāiko also provided Te Rūnanga o Ngāi Tahu (Ngāi Tahu) with an invitation to consult. Ngāi Tahu noted (refer **Appendix F4**) the importance of ongoing and meaningful engagement with the relevant Papatipu Rūnanga, being Ngāti Waewae, prior to lodgement of the Application and throughout the Project process. Based on the information currently available and provided engagement continued with Ngāti Waewae, it is unlikely that further direct engagement with Ngāi Tahu would be required.

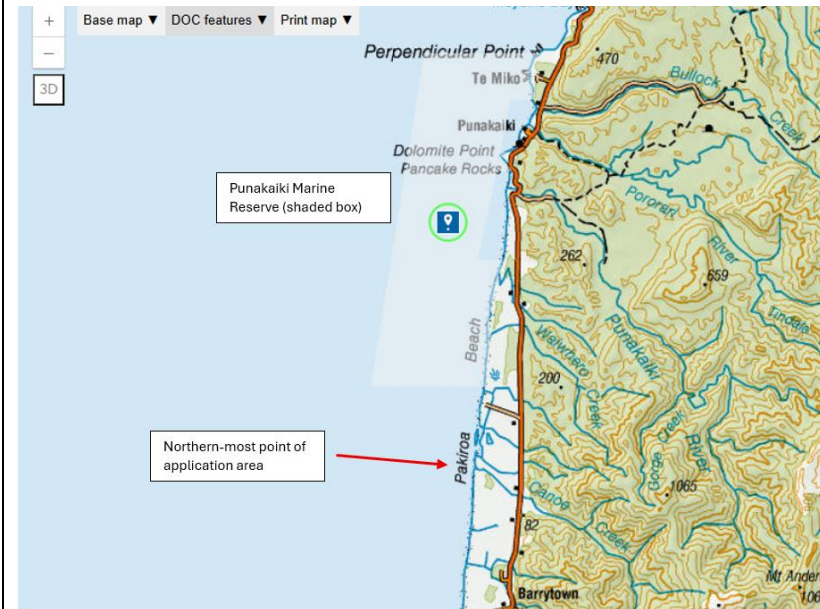
In relation to the landowners within the Application Area, each landowner has provided a written letter of consent acknowledging and authorising Tāiko to access the relevant land for the purposes of undertaking mining and associated activities forming part of the Barrytown Minerals Project. This acknowledgement also extends to activities required to comply with any conditions associated with an archaeological authority, resource consents and wildlife authorities. Copies of these letters of consent are included in **Appendix J2**.

Schedule 1

Tāiko received a response from Ngāi Tahu following pre-lodgement consultation. While there are no matters of concern raised Ngāi Tahu recommended engagement on several matters with Ngāti Waewae to identify the appropriate way to meet this obligation of the Fast-track Act. Commentary on each of the matters raised is provided in **Table 2**.

Table 2: Matters raised by Ngāi Tahu

Matter Identified / Response
Partnership Protocol and Mana Whakahono a Rohe
In preparing and assessing the Project, Tāiko has recognised and applied the principles underpinning this Arrangement through ongoing engagement with Ngāti Waewae, provision of technical information, involvement of iwi in discussions relating to environmental management and consideration of cultural values and outcomes within the proposed conditions and management plans presented to the Panel.
Pounamu Resource Management Plan 2002
Pounamu will be returned to the mining void as oversized material. The Application Area is not identified as a Pounamu Management Area within the Te Tai o Poutini Plan.
Maori Archaeological Sites noted in Appendix Ten of the Te Tai o Poutini Plan (TTPP)
There are no Maori Archaeological Sites noted in Appendix Ten of the TTPP identified on the site. There are two sites identified in the Grey District Plan which are included within the Archaeological Assessment at Appendix L9.
The Application Area is not a site or area of significance to Maori under the TTPP.
Marine Reserve (Punakaiki) Order 2014
The Punakaiki Marine Reserve is located to the north of the Application area. The northern most point of the Southern Block is shown by the red arrow. Nevertheless, the Project has been designed to avoid effects on the marine environment.



Schedule 2

Tāiko has received comments on the draft conditions proposed from the West Coast Regional Council following pre-lodgement consultation. The conditions, comments and any changes made as a result of the comments made is outlined in **Table 3**.

Deleted text suggestions are shown in ~~struckout text~~, additions are shown as *underlined and italicised text*.

Table 3: Assessment of feedback on proposed consent conditions

Condition	WCRC Comment	Tāiko Comment and Outcome
1.3 All actual and reasonable costs incurred by the Consent Authorities in monitoring, enforcement and administration of this resource consent must be met by the Consent Holder	Do not require, though if GDC wish to keep it won't cause any issues	No change required The condition is not required as it legislated by the RMA in section 36(1)(b)-(cb). Will retain condition as it stands at this time.
1.4 ... The Accountable Person must be based on-site for a minimum of 4 hours per day, for three days per week....	Should this person be available whenever mining is occurring on site	No change required Under the Health and Safety Act the mine manager does not have to be on site at all times and functions can be delegated. Likely have more than one responsible person. Condition 1.2 requires that a copy of the consent and all relevant plans to be held on site with staff and contractors to be made aware of these.
2.1 For monitoring purposes, the Consent Holder must notify the Consent Authorities of the following:	Add in the e-mail address wcrccompliance@wrc.govt.nz for notification	Noted Email addresses for both WCRC and GDC are to be included in the condition.
4.5(a) The bond quantum must be \$300,000	How is the value calculated. Is this intended to be additional to the existing bond? Bond calculation could be detailed in the body of the application so everyone is clear how this was calculated and what it covers.	No change required Broadly this is based on \$20,000 per hectare which has been the standard amount Council uses for gold mining.
5.1 ...the Consent Holder must submit a programme of work ("Annual Work Programme") for certification <u>approval</u> by the Consent Authorities detailing:	Add in the compliance email address for submission of the AWP	Noted For the annual work programme the change in wording adopted. For management plans retain existing. Email addresses added.
6.1 At least 40 working days prior to undertaking any activities authorised by these consents, the Consent Holder must submit the following	Where draft plans are available or easily produceable, it is better to have the draft plans supplied with the application as the potential effects are not	No change required Management plans will be provided to the Consent Authorities when the application is lodged.

Condition	WCRC Comment	Tāiko Comment and Outcome
management plans to the Consent Authorities for certification:	fully outlined up front if not provided	
6.2(b) Where plans require the input of an appropriately qualified professional, the Consent Holder must engage an appropriately qualified person to prepare the Plan.	What if Councils need to seek appropriately qualified people to approve the plans? Need assurance costs will be covered by applicant.	No change required Costs are covered by legislation (Section 36(c) of RMA)
6.3 Site activities must not commence until the Management Plans listed in Condition 6.1 have been certified <i>approved</i> by the Consent Authorities	Amendment suggested	No change required Legal counsel has advised that the law requires conditions with respect to management plans to be 'certified' by consent authorities. This is consistent with the CB conditions of consent.
6.4 If the Consent Holder has not received a response from the Consent Authorities within 20 working days of the date of submission of a management plan under Condition 6.1, the management plan must be deemed certified	We are no longer agreeing to this type of condition so should be deleted.	No change required The consent holder needs certainty of timeframe. Council has the ability under condition 6.4(b) to ask for further information or amendments which would restart the time frame.
8.1(b) Any accidental discharge of greater than 20 litres of fuel...	That is a lot and could cause issues. Change to 2 litres or any spill.	No change required The proposed spill volume threshold is recommended to remain unchanged. This recognises that the potential effects of a spill will vary depending on the location and circumstances of the incident. For example, a spill occurring within an isolated paddock may result in negligible environmental effects, whereas a spill occurring within or adjacent to a waterbody would require a more immediate response. This effects-based approach is further supported by Condition 8.1(a), which prohibits refuelling within 20 metres of any waterbody, thereby significantly reducing the likelihood of a spill occurring in a location where adverse effects on water quality could arise.
9.1(a) Reinstatement of productive pasture;	Add except in areas where the constructed wetland is proposed?	No change required There are three components to the progressive rehabilitation as set out in 9.1a-c. Adding the

Condition	WCRC Comment	Tāiko Comment and Outcome
		change sought is not considered to clarify this condition.
9.2(a) To create a final landform with a similar contour and profile at final mine closure as that which existed prior to mining but with improved drainage across the site;	Except for the wetland	No change required There are four objectives of the RMP. One of these is to construct and establish a permanent wetland area as set out in 9.2d. Each of the four objectives are to occur across the site as set out in the RMP. Adding the change sought is not considered to clarify this condition.
9.3(d) Establishment of pasture cover over all disturbed land	Except for wetland area	No change required 9.3a-i set out what the RMP is to include. 9.3f includes the construction and planting details for the constructed wetland area. Adding the change sought is not considered to clarify this condition.
9.4 If for any reason active mining ceases for more than 6 months, operational stockpiles must be removed and the stockpiled material returned to the mining area, and all disturbed areas must be rehabilitated as required by the conditions of these consents within 12 months from the date of the last mining activity	This is a long period to remain open. To be in line with other consents of this nature would say 3 months for cease of active mining and 6 months for rehabilitation or as otherwise agreed with the consent authority if timing means it would be in the middle of winter for rehab.	No change required Retain 6 months. This has been the accepted timeframe for similar consents and allows time following natural disasters and major road outages for the activity to commence again.
22.1(d)... and the objective in ii above	Query 'ii' reference.	Noted Condition 22.1 has been updated which has resulted in this reference being updated to refer to the WMP.
22.1(e)... meets standards which are consistent with Hydrological effects goal III in 6.1 of the Water Management Plan	Goal III should be spelt out	Noted Condition 22.1 has been updated. A cross reference is included in 22.1 iv for clarity.
22.1(g) The rate of take of water will be monitored in accordance with the Resource Management (Measurement and Reporting of Water Takes) Regulations...	Need to spell out what regulations say, in particular that the information now need to be telemetered.	Noted Additional detail added to the advice note. <u>With respect to 21.1vii usage will be measured at 15-minute intervals and data reported electronically to the respective consent authority daily. Data Storage: Systems must be capable of storing records. If using telemetry, dataloggers should store at least one month of data; standalone loggers require 12 months of storage. Verification: Meters must</u>

Condition	WCRC Comment	Tāiko Comment and Outcome
		<u>be verified (calibrated) by a qualified person to ensure accuracy. If no water is taken, reports must indicate zero usage. If no water is taken, reports must indicate zero usage.</u>
22.1(g) ... The maximum rate of take is anticipated to be required for infrequent periods of up to 7 days. It is also anticipated that the long-term abstraction rate would be less at 9.5 L/s.	This is an advice note and not enforceable I would think.	Noted Moved from condition to Advice Note.
22.1(h) The rehabilitated mine area will provide for the establishment of a large wetland complex in the east of the former mining area.	Size actually needs to be specified and in accordance with a wetland plan perhaps.	Noted Condition to be updated to refer to wetland size of at least 50ha.
25.2(d) Dust monitoring methods	Need to list all possible monitoring methods and why one was chosen over another. Dust deposition gauges are not the most effective method and there may be better methods available.	No change required There is no need to list all methods. The Management Plan needs to cover off the reason for selecting the preferred method.
26.1 Advice Note: <i>For the purpose of Condition 28.1</i>	Check cross reference	Noted Reference in Advice Note to be amended to 26.1.
26.2(a) Dust Deposition Gauges	Are there any other methods for monitoring dust as these gauges have been found to not be accurate or a very reliable method of monitoring. What about high volume dust monitoring for instance?	No change required The high volume dust monitors suggested are generally used for air quality monitoring rather than dust deposition. Dust deposition gauges are passive i.e. do not need power. Deposition gauges are better suited in this application i.e. placed along boundaries near sensitive receptors and will provide for a continuation of the current base data set from the operational dust monitors onsite now.
28.1 The consent holder must not commence any stream works activity until it has obtained certification <u>approval</u> from the West Coast Regional Council for the Rehabilitation Management Plan	Amendment	No change required As above
28.2 The Rehabilitation Management Plan must include, but is not limited	Talk about any exclusion periods for spawning etc as well if appropriate.	No change required Refer ESL Memo included at the rear of this document. Any effects during the spawning

Condition	WCRC Comment	Tāiko Comment and Outcome
to, including the following streamworks information:		season would be limited to a small proportion of watercourses at any one time due to the progressive north-south mining sequence. Given the widespread distribution of whitebait species across the site and the localised and temporary nature of stream disturbance, significant effects on overall whitebait populations within the Southern Block are not anticipated.
28.5a(v) <i>Fish passage is maintained at all times.</i>	New condition	Noted Include new condition 28.2vi.
28.5b(iv) The Consent Holder shall <i>must</i> ensure the on-going maintenance of any riparian planting for a period of no less than two years. This shall <i>must</i> include on-going monitoring and eradication of woody weed species which may establish including blackberry and gorse.	Amendments	Noted Amendment made.
29.2 The Consent Holder must undertake monitoring of the surface water take from Canoe Creek at 15 minute intervals and supply this information electronically...	Has to be telemetered now.	Noted Condition has been updated.

Schedule 3

Tāiko received a summary of matters from the Department of Conservation (DOC) following a pre-lodgement consultation request. The issues raised have been reviewed by both Tāiko and Dr Gary Bramley of Ecological Solutions. Responses to the matters identified by DOC are set out in Table 4 and the accompanying memorandum by Ecological Solutions at the rear of this document, depending on the nature of the issue raised.

Table 4: Assessment of matters raised by Department of Conservation

Matter Identified	Response	Outcome
Treaty partners		
We encourage the applicant to engage directly with relevant Māori groups as required by section 29 of the Act.	Taiko has undertaken ongoing consultation with Te Rūnanga o Ngāti Waewae as detailed in the Consultation Summary. Te Rūnanga o Ngāi Tahu have also been invited to consult on the Project. Responses from both Runanga are included at Appendix F3 and F4 .	No change required
DOC is aware of the following Treaty settlement obligations that may be relevant to this site under the Ngāi Tahu Claims Settlement Act 1998: <ul style="list-style-type: none"> • The conservation of aquatic life and freshwater fisheries • Wāhi tapu, wāhi taonga and other historic places of significance to Ngāi Tahu • Taonga species listed in Schedule 97 including fish species and Kororā (little blue penguin) 		
Consistency with Central Block (CB)		
No requirement to consult Department of Conservation with respect to AMP	As noted in the memo prepared by G. Bramley, consultation is required by the FTAA and DOC has ultimate authority via the issuance of the Wildlife Act Authority. Feedback received has resulted in revisions to the AMP and LMP.	No change required DOC have provided feedback on the AMP through this notification process.
No pest control	Pest control will be undertaken in accordance with the NPSIB and any other relevant statutory requirements. Outside of the resource consent requirements Tāiko will undertake wider biodiversity enhancement work that will include pest control to be developed in partnership with Ngāti Waewae.	No change required
Conditions do not specify authorised parties for lighting audits	Lighting audits are to be carried out by a suitably qualified person.	Noted Refer new proposed condition 13.4.
Lighting addressed in MP's but not conditions	Lighting is addressed in proposed Condition 17.0 as well as new proposed condition 13.4d. New proposed condition	No change required

Matter Identified	Response	Outcome
	13.4d will initiate further operational requirements, should they be required. There is very low risk that artificial light will adversely affect tāiko at this site (refer Appendix L4 p.xiii).	
Lighting requirements reduced compared to CB	The activity proposed is for daytime mining – not for all of the same activities as were consented at the CB. Light on site will be minimal for health and safety purposes in fixing machinery if required.	Noted New draft proposed condition 13.4d <i>In the event that a grounded seabird is discovered a lighting audit will be undertaken by a suitably qualified person to ensure lighting at the site complies with the requirements set out in this Avian Management Plan and the latest version of the Australian Government National Light Pollution Guidelines for Wildlife.</i>
No requirement for Lighting Management Plan, Australian Wildlife Guidelines only apply to design, not installation and operation	Conditions proposed are proportionate to the operational parameters of the activity and are based on the technical input of the Ecologists advising on these matters and the level of potential risk to species.	
Management Plans subject to amendments so provisions should be in conditions	The proposed consent conditions secure the key environmental outcomes, limits and performance standards for the Project. The Management Plans are implementation tools that set out the detailed methods for achieving compliance with those conditions. For a long-term and progressive activity such as this, it is appropriate that Management Plans retain flexibility to respond to monitoring results, updated best practice and changing site conditions over time. Any amendments to Management Plans must remain consistent with, and give effect to, the environmental outcomes required by the consent conditions.	No change required
SB conditions should align with the final version of the CB conditions, other than for provisions which are location-specific	The CB and SB Projects are different in that there is no WCP or access being sought for the SB. The mining method is also different between “wet” and “dry” techniques. The consent conditions have been drafted to reflect the Project on the ground.	No change required
The basis for setting the bond at \$300,000 has not been provided by the applicant. It appears proportionally lower than the bond for the Central Block given the much larger mining area and should cover	The bond set for the CB was based on having to remove the WCP at the conclusion of mining. The bond set for the SB is proportionate to the scale of the activity noting that mining activity will only result in the disturbance of a maximum of 16ha at a time as set out in the proposed conditions.	No change required

Matter Identified	Response	Outcome
rehabilitation in addition to mine closure.		
The landscaping conditions refer to a superseded version of the Landscape Mitigation Package.	The Landscape Mitigation Package has undergone several reviews as part of the development of the project. The correct reference will be included in the proposed conditions on lodgement.	Noted Include final reference version details of Landscape Mitigation Package in conditions.
The establishment of a Community Liaison Group should be considered.	The CLG was established in response to concerns raised from neighbouring residents to the CB project. Tāiko notes that DOC asked to be removed from the CLG established for the CB. The Southern Block project is undertaken solely on private land (apart from the road reserve), the effects are well understood and limited to the subject site.	No change required
Hours of darkness should be consistent with CB	This was an oversight and has been updated in the conditions proposed for the SB.	Noted Amendment made to Condition 11.1 and 11.2 confirming that hours of daylight are between sunrise and sunset.
Avifauna		
Koroā are a taonga for Ngāi Tahu and pest control targeting stoats, mustelids (stoats and weasels) and cats should be implemented.	Pest control will be undertaken in accordance with the NPSIB and any other relevant statutory requirements. Outside of the resource consent requirements Tāiko will undertake wider biodiversity enhancement work that will include pest control to be developed in partnership with Ngāti Waewae.	No action required
Planning framework		
The draft documents provided do not include a planning assessment, which will be required under FTAA Sch 5 cl 5. Planning framework re. NPSIB, WCRPS, Regional Land and Water Plan, TTPP policies. Need to demonstrate how proposal will avoid impacts on tāiko	The planning assessment was not provided to DOC, but demonstrates how the proposal will avoid impacts on Tāiko. The technical assessments underpinning the planning assessment identify that the effects on tāiko are considered to be very low (refer Appendix L4) with specific effects management detailed in the Avian Management Plan (refer Appendix M2 section 5).	No action required
Water quality		
A technical expert with specialist expertise in geochemistry would be required to assess whether the project will cause significant contamination of freshwaters with metals, acid mine drainage, etc.	M. Fitzpatrick contributed to the ecological assessment that was provided to DOC. Refer Appendix L4C Statement of Evidence of M. Fitzpatrick in relation to water quality. With the proposed lime treatment, monitoring programme and consent conditions, including water quality limits, establishing baseline conditions and annual hydrological reporting, adverse effects on water quality and aquatic ecosystems will	No change required

Matter Identified	Response	Outcome
	be avoided during both the mining operations and upon completion of the activity.	
Water take		
The water take from Canoe Creek – expect to see a “cease take” threshold to be included.	The water take from canoe Creek is already authorised through the existing CB consent. A new consent is sought to cover activities within the SB. Conditions relating to minimum flow requirements, cease-take thresholds and water flow management are already established under the CB consent and will similarly apply to the SB activities. The consents cannot operate concurrently.	No change required
DOC Statutory Planning Document considerations		
<p>The application is unlikely to be inconsistent with the relevant statutory planning provisions. However, consideration needs to be given to:</p> <ul style="list-style-type: none"> managing rare, threatened and at-risk species that may be found on the site to ensure their persistence and disturbance is minimised protection of freshwater fisheries, fish habitat and fish passage preservation of threatened indigenous freshwater species. consultation with Papatipu Rūnanga if any species found are taonga species listed in Appendix 4 of the West Coast Te Tai Poutini Conservation Management Strategy. Conservation General Policy 2005 (CGP) 	<p>Consideration has been given to the matters identified by DOC throughout the assessments undertaken on the site as well as through the consultation undertaken with Ngāti Waewae and Ngāi Tahu. DOC's comment that the application is unlikely to be inconsistent with relevant statutory planning provisions is noted.</p>	No change required
Additional Notes		
Draft conditions, refers to the Conservation Status (Threatened or At Risk bird species) - the incorrect name is used. This should refer to the New Zealand Threat Classification system ('NZTCS') nztc.org	Noted	Noted Amendment made to second advice note under Condition 13.7 to include the correct reference.
It is not clear what the situation is for trucking movements. If trucking is part	Trucking is not part of this Application. This is covered in the Project Description in Section 6 of the Application. There is no	No change required

Matter Identified	Response	Outcome
of this application, then trucking the mined material away under lights should be prohibited. If it is not part of this application, then it should be clearly explained how it is covered elsewhere.	trucking of material outside of daylight hours as set out in the consent conditions of the WCP refer Appendix H3 .	
Effects of future highway lighting on birds Trucking movements under lights not clear whether part of application or not	Trucking movements are authorised under the WCP consent. These restrict trucking movements to daylight hours thereby avoiding lighting effects on avian species. This is set out in section 6.5 of the Application.	No change required
Note that a panel will invite the statutory bodies listed in clause 4 of Schedule 7 to comment on the application (NZCA, conservation boards, Fish and Game Council, and Game Animal Council). We encourage applicants to engage with these bodies in advance of filing a substantive application	It is anticipated that the following legislated parties will be invited to provide written comments on the Application for Wildlife Approval. <ul style="list-style-type: none"> • The New Zealand Conservation Authority; • Relevant Conservation Boards; • The New Zealand Fish and Game Council; and • The Game Animal Council. 	No change required

Attention: Nichola Costley, Tai Poutini Resources Limited

CC: Alex Booker, Anderson Lloyd

Date: 24 April 2026

From: Dr Gary Bramley

RE: Tāiko Critical Minerals - Response to feedback from consultation with the Department of Conservation

1. BACKGROUND

Tāiko Critical Minerals Ltd proposes to extend mining for ilmenite, garnet and other minerals within Mining Permit MP 60785 at the Barrytown Flats to include the ‘Southern Block’ (SB), which is approximately 408ha in extent and located between Canoe Creek and Fagan Creek. TCM’s application to seek resource consents to mine within the SB was accepted into the Fast Track process as a Schedule 2 Project on 6 October 2024. Resource consents are being sought under Schedule 5 of the Fast Track Approvals Act 2024. Wildlife approvals are also being sought under Schedule 7 for management of lizards and avifauna. Tāiko Critical Minerals Ltd are preparing to submit their substantive application and have been undertaking consultation with relevant parties, including the Department of Conservation. Pursuant to that consultation, feedback on the application and accompanying management plans has been received from the Department of Conservation and you have asked me to respond. This memo provides that response and also identifies where changes have been made to the application documents in response to the feedback provided.

2. MATTERS RAISED

The Department of Conservation’s feedback identifies a number of matters in relation to ecological impacts. These matters are briefly described in Table 1 below, along with our response and also identifies where the relevant document(s) have been updated. Tracked change copies of the documents are also attached as Appendices 1 – 3.

Table 1: Summary of Department of Conservation feedback and Ecological Solutions Limited’s response

Matter Identified	Response	Where addressed
General		
Include up to date survey results	The most recent avifauna monitoring data has been taken into account when preparing the	Draft Avian Management Plan Section 2.1.

	Avian Management Plan. We have submitted a request to the Department of Conservation for updated lizard and bat database records.	Draft Lizard Management
Clearly state activities that approvals are sought for (catch, kill, liberate)	Activities relating to lizards include capture, handling, relocation and liberation and incidental killing. Activities relating to birds include applying deterrents (disturbance) and handling (including of grounded seabirds).	WAA Application document to be updated.
Ensure specific WA approval term per species is included in application docs	Term for all WAA to be the same as the resource consents.	WAA Application document to be updated.
Lizards		
Methods other than ACOs should be used	Manual searches were included. Funnel traps have been added.	LMP, Sections 2.3-2.4
Specify number of devices in each area or habitat type	Total of at least 135 triple stacked ACOs (in clusters) and 60 funnel traps proposed spread across the locations shown in Figure 2 of the LMP.	LMP, Sections 2.3-2.4
Assessment of release site suitability needed including confirmation of ongoing protections	There are appropriate release sites within the application area and an assessment of the particular proposed release sites will be carried out by the project herpetologist prior to any capture and release. Amendments to suitable habitat (e.g., addition of rock piles or log stacks) is also proposed as set out in the LMP.	LMP, Section 2.11
Pest control required for successful lizard mitigation	Effective pest control for lizards at this site would require removal of mice which is not technically achievable without a predator proof fence which is not proposed. Provision of habitat (rock piles, log stacks) is expected to provide refuges for lizards in habitat that is similar or better-quality than where they were captured.	
No proposed long-term lizard monitoring. Should be monitored once after each salvage, then every 3yrs for 3	Lizard monitoring is only feasible if they are common. Provision for monitoring has been included in the LMP if more than 50 lizards are relocated. If required,	LMP, Sections 2.12, 3.0 and 4.0

measures (annually during mining, 9 yrs post-mining)	monitoring will be undertaken annually for the life of mining plus one year following mine closure to confirm that the lizard population has been maintained/improved.	
Consistency with Central Block (CB)		
Conditions don't require protection of existing nests for TAR species	Mining at the CB is 'dry' mining, whereas mining at the SB is 'wet' (i.e., using a dredge pond). This has practical implications for how far ahead of mining actions such as deterrents and protection of nests can be achieved. Section 3.4 of the AMP provides for management of existing nests of TAR species where practicable. Note also that grazing of livestock will continue in areas not being actively mined and the presence of livestock will likely reduce nesting success of any birds attempting to nest in pasture.	
No ground searching for tāiko	Any risk that tāiko may be grounded by lighting at the mining pit is considered very low. This is a mining activity which is to be undertaken during the hours of daylight only. Any lighting on site around the pit would be limited to health and safety lighting to address equipment failures if/when required and is therefore minimal. Lighting is addressed in condition 17.0. Refer section 5.2.2 of the AMP. Section 5.3.2 sets out the procedures should a grounded tāiko be discovered.	
No requirement to respond to tāiko interactions provided	As above.	
No requirement to consult Department of Conservation with respect to AMP	Consultation is required by the FTAA and the Department of Conservation has ultimate authority via the issuance of the Wildlife Act Authority. This feedback has resulted in revisions to the AMP and LMP.	To be addressed by Tāiko Critical Minerals.
No pest control	Tāiko Critical Minerals proposes to undertake site wide pest control	To be addressed by Tāiko Critical Minerals.

	independent of any resource consent conditions.	
AMP does not include protection of surrounding habitat as an objective	Some habitats (e.g., the coastal lagoon, dredge ponds) surrounding the CB are important for birds and are identified as SNAs in the draft Te Tai o Poutini District Plan. The proposal for the SB includes setbacks (20m from the site boundaries and 50m from the western coastline). There are no such important bird habitats adjoining the SB. On that basis, protection of adjoining habitats is not required.	
AMP does not require reporting of tāiko groundings	Section 5.3.2 of the AMP requires the Department to be notified via 0800 DOC HOT “as soon as possible for advice on care and relocation”.	New draft proposed Condition 13.4c <i>Any grounded tāiko discovered must be reported to the Department of Conservation via their 0800 DOC HOT line as soon as possible</i>
Conditions do not specify authorised parties for lighting audits		To be addressed by the Project Planner
Lighting addressed in MP’s but not conditions	Draft proposed consent condition 17 relates to lighting	To be addressed by the Project Planner
Lighting requirements reduced compared to CB	As noted above, no nighttime activities are proposed at the site beyond those relating to repair of equipment failures as and when required. The conditions relating to the WCP would apply at the new location.	To be addressed by the Project Planner
No requirement for Lighting MP, AW guidelines only apply to design, not installation and operation	As above. The mining area would be fenced to prevent kōrora accessing it.	To be addressed by the Project Planner
MP’s subject to amendments so provisions should be in conditions	The flexibility to update the management plans in response to new information or changes to mine planning or methods is required. In my view the key environmental outcomes are captured in the conditions and	To be addressed by the Project Planner

	these are reflected in the relevant management plans.	
SB conditions should match CB conditions	The mining method is different between the CB and SB (“wet” versus “dry”), so amendments are required to address these differences.	
Proposed setbacks are small	The proposed setbacks are similar to those at the CB – 20m from site boundaries and large water courses and 50m from the coast. As noted above, the habitats outside the footprint do not include important wetlands or habitats for birds as is the case at the CB.	
No assessment of hydrological effects on surface water and wetlands outside footprint	The proposal to use wet mining means that there is no substantial drawdown of groundwater. On that basis the hydrologists (Kōmanawa Solutions Limited) have concluded that there will be no hydrological effects beyond the boundary. At the CB dry mining meant that there was groundwater drawdown that extended beyond the site boundaries and those effects had to be considered.	
Hours of darkness should be consistent with CB	This has been updated for the SB Conditions, Section 11.1 and the AMP, Section 4.3.2, 4.3.3, 5.2.2 and 5.3.3.	To be addressed by the Project Planner and amendments made.
AMP states audits undertaken if grounded seabirds. Conditions should reflect this	To be added to conditions for SB	New draft proposed condition 13.4d <i>In the event that a grounded seabird is discovered a lighting audit will be undertaken to ensure lighting at the site complies with the requirements set out in this Avian Management Plan and the latest version of the Australian Government National Light Pollution Guidelines for Wildlife.</i>

Avifauna		
Pest control required	As above, Tāiko Critical Minerals proposes site wide pest control outside of the approvals process.	To be addressed by Tāiko Critical Minerals.
Additional measures should be included if bird numbers decline	Given the small numbers of at risk or threatened species present within and around the site, meaningful time series data for those species will be difficult to obtain to determine what constitutes natural variation and what constitutes a decline. Identifying a 'threshold' at which additional measures would be required would also be difficult. As an example, in the pre-mining monitoring data collected to date, occasional fernbird detections have been recorded across years (heard some years, not others). There is no evidence the irregularity of these records is due to a decline in fernbirds, but more likely the occasional records are dispersing juveniles that don't establish territories. On that basis detecting decline would not be practicable. In the event that kororā and/or grounded tāiko are detected then additional measures are proposed to protect these species as set out in the draft AMP.	Draft AMP, Section 4.0 (kororā) and 5.0 (tāiko)
Wetland monitoring required for wetland birds	Bird monitoring targets all species, using the site including wetland birds and has been designed to cover the range of habitats present. The use of acoustic recorders caters for cryptic bird species detections such as bittern and fernbird. The AMP has multiple bird monitoring sites located on waterways/identified wetlands including floodplain and palustrine wetland areas. Hump and hollow wetlands are typically not vegetated and so do not have habitat to support these species continuously.	AMP, Section 3.1, Figure 3 includes additional wetland locations.
Requirement that no quality habitat (wetland/shrubland)	Mining begins north of Granite Creek, where there is very little	

reduced through life of operations	wetland habitat present. Wetland construction occurs both north and south of Granite Creek, with construction north of Granite Creek occurring during Years 1 and 2 in areas that are not wetlands currently (see the draft Rehabilitation Management Plan). Wetland construction south of Granite Creek begins in Year 9 with most of the construction occurring in years 10 and 11. All of the wetland north of Granite Creek will be constructed before wetland removal south of Granite Creek (where most of the dredge pits are located, and which do provide potential habitat for birds) commences. When considering the rehabilitation across the site as a whole, new rehabilitated wetland habitat will be available prior to removal.	
Management for tāiko groundings should be included	These are provided in the AMP already.	AMP, Section 5.3.
Lighting		
Consent conditions correctly refer to 2023 light pollution guidelines, however the appendix refers to 2020	It is unclear what appendix is being referred to. The AMP and references have been reviewed to make reference to the most recent document.	
Planning framework		
Planning framework re. NPSIB, WCRPS, Regional Land and Water Plan, TTPP policies. Need to demonstrate how proposal will avoid impacts on tāiko	Effects on tāiko are addressed in the EclA with effects management detailed in the AMP.	
Wetlands		
Wetland classification issues	Induced wetlands are no longer referred to in the current NPSFM (amended 2025). Under the definition of a natural inland wetland, exclusions apply for ‘a deliberately constructed wetland, other than a wetland constructed to offset impacts on, or to restore, an existing or former natural inland wetland’ or ‘a wetland that	

	<p>has developed in or around a deliberately constructed water body, since the construction of the water body'. Hump and hollow landforms are deliberately constructed and create shallow waterbodies (i.e., hollows). They are also not constructed to restore an existing or former natural inland wetland. They therefore do not meet the criteria of a natural inland wetland.</p> <p>Even if it is accepted that wetlands within hollows are natural inland wetlands for the purposes of the NPS-FM (which is not agreed), more wetland is being created than is being removed overall and the proposal is consistent with the relevant policies of the NPS-FM.</p>	
Consideration of wetland fauna	<p>Current monitoring includes both acoustic recorders and 5MBC installed across multiple habitats including natural wetlands and is intended to capture all birds using the Site. The low quality of the wetlands at the Site means that cryptic wetland species such as bittern, fernbird or crake are unlikely to be permanent residents there. Wetland species have been considered.</p> <p>The proposal to create wetland habitat before the majority of similar habitat is removed will provide additional/new habitat which these species can use when the existing areas are removed.</p>	
Require demonstration of ecological gain for wetlands	<p>More wetland will be created than will be removed (including all wetlands, not just those identified as natural inland wetlands). The planting plan attached to the landscape assessment sets out standards for planting (indigenous species to be used, density and the like). The new wetland will also be fenced to exclude livestock and be subject to weed</p>	

	<p>control until plants are established.</p> <p>Given that the existing wetlands are grazed and otherwise affected by livestock and other farming activities, predominantly comprise exotic species and are generally small and scattered across the Site, a Biodiversity Offset Accounting Model or Biodiversity Compensation Model is considered superfluous to demonstrate ecological gain.</p>	
Time lag between wetland removal and reconstruction	<p>Construction of the rehabilitation wetland is carried out in Years 1 and 2 north of Granite Creek.</p> <p>When considering the rehabilitation across both the CB and the SB, rehabilitated wetland habitat will be available prior to removal.</p>	
Effects on wetlands outside SB	<p>The hydrological report prepared by Kōmanawa Solutions Limited concludes that there will be no adverse effects on hydrology (and therefore wetlands) outside the SB due to the proposed activities.</p>	
Water quality		
Potential for contamination		
Streams		
SEV's needed and criteria to assess ecological condition of remediated streams	<p>Existing watercourses (excluding drains) are mostly highly modified through realignment and riparian vegetation clearance and grazing damage. Most have straightened channel alignments either for their entire length or for large portions. Proposed rehabilitation will introduce meanders, have variable widths and depths, provide higher diversity aquatic habitat and have narrow planted riparian margins that are greater than what currently exists within the grazed pasture landscape.</p> <p>There will be no loss of extent and ecological values are expected to be greater than what currently</p>	

	exists based on the measures proposed to be implemented.	
Riparian planting very narrow. 5m minimum with 10m more adequate	Riparian planting is narrow, but will be an improvement from the current state which comprises mostly grazed pasture grass, rank grass, narrow exotic scrub and occasional natives along streambanks. Many of the creeks have narrow channel widths so even a narrow indigenous vegetated riparian margin will be an improvement on the status quo.	
Water take		
Should be a threshold for the flow level of the creek to trigger a 'cease take'	The water take from the creek is already consented for the CB and this consent will apply with the term being extended to cover activities in the SB. Cease take thresholds and water flow issues are addressed in consent conditions for the CB, and will similarly apply to the SB.	
Additional notes		
Check whether watercourse modifications trigger requirement for complex freshwater fisheries approval	Bridges and culverts will be reinstated as required. Culverts will be installed to provide fish passage in accordance with NZ Fish Passage Guidelines (Fraser et al. 2025). Watercourses will be diverted to maintain connectivity with upstream and downstream environments at all times and provide fish passage. No weirs or dams will be constructed on watercourses. Complex freshwater fisheries approval is not required.	
No mention of avoiding whitebait season/spawning season	The only watercourse within the SB and outside the 50 m buffer from MHWS (i.e., excluded from mining) which has characteristics that could provide Īnanga spawning habitat (e.g., overhanging grass lined banks, tidal influence) is the lower reaches of Granite Creek. Granite Creek will be retained and not modified during mining so	

	<p>potential Inanga spawning habitat will not be affected. Other whitebait species were recorded within the SB based on EFM and eDNA surveys. Any impacts during the whitebait spawning season (i.e., autumn-winter) would be limited to a small proportion of the overall number of watercourses within the SB where whitebait species occur at any one time due to the typically north-south direction of the mining path. Whitebait species appear to be widely distributed in watercourses across the SB so any effects during the spawning season will be limited to watercourses being actively mined at the time. The discrete nature of potential disturbance to watercourses during the spawning season (i.e., due to the mining path) and wide distribution of whitebait species means that there is unlikely to be significant effects on the overall population of whitebait species within the SB.</p>	
<p>Fish relocation plan does not mention biosecurity</p>	<p>The Native Fish Capture and Relocation Plan (NFCRP) states that pest fish (e.g., noxious, notifiable, pest or unwanted organisms) will be humanely euthanised (Section 2.6 of NFCRP). Native fish will be relocated to watercourses within the catchment of origin or sites appropriate for the required habitat type (Section 2.7 of NFCRP). Care will be taken to remove all aquatic plant material prior to transferring to buckets/fish bin (Section 2.6 of NFCRP) to avoid transfer between watercourses. Gear used will be sterilised (e.g., washdown, STERigene, salt soak, dry) prior to entering the site in accordance with best practice to avoid introducing unwanted material to the site.</p>	<p>Section 2.6 of NFCRP Section 2.7 of NFCRP</p>

<p>Implications for methodology change on ecological evaluations</p>	<p>There are three main ecological implications resulting from the change from open-pit (dry) mining used in the CB, to dredge-pond (wet) mining, used in the SB. These are:</p> <p>1) Dredge-pond mining reduces effects on groundwater and surface water compared to open-pit (dry) mining.</p> <p>2) Dredge-pond mining could result in more negative effects on aquatic fauna than the dry mining at the CB. These have been considered and addressed in the effects management actions proposed, including the deployment of an Erosion and Sediment Control Plan (ESCP) to control sediment and separate clean and dirty water. In addition, wet mining creates a new separate dredge pond, as opposed to removing and returning water from a natural water source, and therefore does not affect any existing resident fauna.</p> <p>3) it is harder to manage nesting avifauna in the surrounding environment using wet mining because of the larger footprint operational at any one time and the lack of easy ability to stop progress. These matters have been considered and the AMP provides for deterrents where practicable to assist in relocating nest initiation by species that may nest in pasture habitat and nest protections in the case of any nest discovery where it is far enough ahead of the mining to ensure it can be protected.</p>	<p>AMP, Section 3.0</p>
<p>DOC Threatened Classification System should read NZ Threat Classification System</p>	<p>Consent Condition 13.7</p>	<p>To be addressed by the Project Planner.</p>
<p>Effects of future highway lighting on birds</p>	<p>Current hours of operations are within daylight hours and therefore nocturnal lighting for trucking</p>	

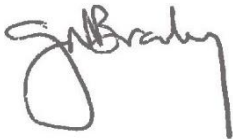
	movements is currently not required.	
Trucking movements under lights not clear whether part of application or not	Truck movements are not part of this Application, and have been consented as part of the WCP.	Section 5.2.3 of the AMP has been amended to avoid confusion.

3. CONCLUSION

The Department of Conservation have raised several ecological matters in their feedback to the consultation documents. Some of these matters have been captured in amendments to the avian and lizard management plans, whilst others have been explained in the table above.

I trust this assists in providing a response to the Department and progressing the application. I have attached the updated management plans for your consideration.

Ngā mihi mahana,



Dr Gary Bramley
Ecologist