

BARRYTOWN MINERALS PROJECT

To: Project Panel for the Barrytown Minerals Project

By email: substantive@fasttrack.govt.nz

Comments on the Barrytown Minerals Project

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Dear Panel,

Thank you for the opportunity to comment on this expanded Fast Track proposal and for including properties, like us, east of SH6 overlooking the mine project area.

I have been very involved in the Coast Road Resilience Group (CRRG) as Chair, but here offer my more personal viewpoint of my experience as an affected individual invited to comment.

Background

My partner and I moved to Barrytown from the Nelson area in 2020.

When we first saw our property we immediately fell in love with it's location and aspect: incredible elevated views out to the Tasman Sea over green farmland and forested remnants, with the bush clad hills of the Paparoa Ranges behind. A rugged, long beach for recreating and many wild places to explore and enjoy. This view and the natural character were the main reasons that we put in an offer on the spot, completed the purchase and re-located here.

Soon after we moved, we heard that an Australian owned company was looking at mining the flats. Stories of past failed attempts from various companies over decades to realise the resource, listening to the concerns of many residents: some who have lived here for generations. Our hearts sank on hearing this news.

The first application from the first iteration of this company was only limited notified and was declined due to 'insufficient information'.

What I witnessed was the human cost of this process. Neighbouring families stressed and time poor, trying to get on with their lives but dominated by communications, submissions, legalities, and hearings. Burnout. The stress that communicating with the company was causing the most directly affected families in those early days.

With the news that the company was re-naming, re-branding and trying again, the co-ordinator/writer of emails informing those with concerns in the community resigned due to burnout. Thinking it would be a shame if this stopped, and wanting to be in service to my new community, I stepped in to take this role on.

I wondered what the proportion of 'pro or anti the mine' was amongst locals in our relatively small population? A response to a mailbox drop to all residents to discuss concerns resulted in a packed meeting with standing room only in the Barrytown Hall. I have observed the concern only grow in the community in the years since.

As coordinator, people with history and background knowledge of the area were seeking me out to talk: the way Rio Tinto in the 80's had stored bags of monazite in the shed that was now Conservation Volunteers, complete with a 'caution radioactive material' sign on the door.



The dairy farms operating inefficiently requiring large inputs; the high water table; the eroding coastline with big chunks of farmland falling into the sea; the stance of the local councils and examples of inefficiencies in monitoring farming practices around protecting the environment; the valuable diminishing wetland and lagoon areas in a place that simply just wants to be wetland; the vulnerability of the one access road; the concerns around noise, dust and increased traffic; the Westland Petrel colonies nearby, vulnerable to many threats including lights and increased human industry. Generally, the dismay and concern and the question: 'what can we do'?

We resurrected the Coast Road Resilience Group (CRRG), as an Incorporated Society, elected a new committee with myself as chair. A considerable segment of the local population was starting to mobilise, we literally held cake and market stalls and other events to fundraise and membership of the CRRG was growing. A smaller number formed the 'working group': sharing our skills, knowledge and working collaboratively as news of the upcoming publicly notified resource consent hearing for what is referred to now as the 63ha 'Central Block' emerged.

The heightened media coverage unfortunately increased stressful divisions within the community. Some of the information sessions organised and run by the company with numbers of pro-mine supporters or prospective employees being brought in, led to a very 'them vs us' scenario. When we suggested via a media release that this could be an up to 50 year operation, we were publicly accused of 'gross hyperbole' by the company's PR person in their response to our comments. According to them, theirs was only a 'boutique' operation and they would be in and out within 12 years. We could see the long-term writing on the wall, it would seem.

Personally, I took a bit of a brunt. My name was attributed to media releases and a very pro-mining person in the community took umbrage to an opinion piece I had written and at my presence at the peaceful protest we had organised outside a company information session in 2023 and told me in no uncertain terms that I 'shouldn't be out in public' and should '&@#% off and go back to where I came from'. I was also informed that this person had disclosed not only my name but also also our address to local pro-mining Facebook pages and our letterbox was vandalised shortly

afterwards. This bullying felt really threatening for my partner and I and created considerable fear around what might eventuate or how things might amplify with these cowboy tactics.

Still, we persevered and with huge amount of volunteer hours we participated in the resource consent hearing early in 2024 which; despite huge community input and close to 180 detailed submissions opposing; was approved. We were devastated and there was media coverage¹

Later in the year, our appeal to the Environment Court, which was settled at mediation in October, resulted in some hard won better conditions for community and environment that the company finally conceded to.

When I attended the first, (and to date only) Community Liaison Group meeting that the conditions required the company to hold just before Christmas in 2024; I spoke to the managing director personally after the meeting. I let him know the community concerns due to it being a potentially much larger and longer project, as the company had been invited to apply under Fast Track. His response: 'Why would we do that? We have our resource consent now'. He also assured me if they ever did go down the Fast Track route, **all** the conditions that we had most recently fought so hard for, would be transferred over to any new mining area or application. N.B: This has not been the case for either the Fast Track application, nor the relocated WCP plant.

So here we are, dealing with a Fast Track application covering a mining area nearly six and a half times larger than the original consented area: 408 ha compared to the initial 63ha, with a 40-50 year time frame. This amplifies all the adverse effects. As I hope I have outlined, it is hard to just consider this latest Fast Track application in isolation, although officially, this is what seems to happen. Over years of watching the company shift and change their approach, their name, their timelines; we have witnessed the company break up and apply for bites of their whole project in increments and separate applications, which, whilst facilitating the company's aims; from our point of view seems to have lessened the protections for community and environment.

In time, and if it proceeds; the Fast Track mining operations would be directly visible front and centre in the middle of the wonderful view from our property; which was the main reason we chose to buy and source of our greatest pleasure in this place. I don't think I could bear and continue to live here under those circumstances and I know of others who feel the same.

Referenced concerns

The council approvals for the MSP plant at Rapahoe (October 2025) and the relocated WSP plant at Barrytown (February 2026); are inextricably linked to the Fast Track application; but were speedily approved without notification to the neighbouring residents.²

Furthermore, in the case of the Rapahoe secondary plant, it is our view that this consent was granted without due concern for the more concentrated radioactive elements that would arise due to secondary processing, storing and transportation. We alerted the GDC to this, but they chose to push on with approval of the consent, justifying this by saying the report by John Bradley was not peer reviewed nor published. It wasn't long before it was.³

Essentially, this report found that the radioactivity of separated HMC material approached ten times the NZ regulatory limit for solids and 30 times the recommended limit for radon. This will

1 <https://www.1news.co.nz/2024/04/30/gutted-barrytown-flats-residents-on-mining-decision/>

2 'We Never Knew' Rapahoe residents blindsided by new mineral plant. Andrea Vance, The Press, October 25, 2025.

3 Bradley et al, 'Radiological Properties of Heavy minerals in the Beach Sand placer at Barrytown, New Zealand', NZ Journal of Geology and Geophysics, 10 March, 2026.

have safety implications regardless of whether the company chooses to store, export or dump this material – and it is still unclear what they intend to do with it. This material will require strict monitoring and management. A concern we have is that will a profit driven company be motivated to spend the money and time required to do this complex process safely? Will the conditions reflect the need for independent testing and will aspects of monitoring be carried out properly by stretched local councils if they are tasked with aspects of this?

There has been confusion about exactly what minerals are to be targeted and what they intend to do with them. TCM mention Ilmenite, Garnet, Zircon and gold, with scant, if any, mention of monazite and other radioactive constituents. Although TCM mention 'critical minerals' and REE's on their own website and in media releases, they don't in resource consent applications. The only exception I found was a very brief mention in the Fast Track substantive application where 'trace monazite' was mentioned.⁴ Interestingly, the Resources Minister very clearly mentions monazite in an interview referenced here⁵, much more lucrative for doing 'deals' with the Americans than ilmenite, garnet or zircon.

As a concerned layperson, I have searched over the years for examples of mining operations overseas mining similar materials in beach sands and unearthed some concerning articles, which did nothing to allay my fears. 'Cancer villages',⁶ to radioactive sand mining containing monazite shut down in India due to health concerns. Under the heading 'The environmental effects of monazite mining', it is stated: 'even after a mineral extraction plant is closed down, the highly radioactive waste from mine and mill tailings will continue to pose a threat to the local public' ⁷

I have observed that this projected new mineral sands industry for the West Coast has been beset by setbacks. The consented Westland Mineral Sands operation at Okari near Cape Foulwind, was placed in care and maintenance this year, with the loss of 40 jobs.⁸ 'Sustained pricing weakness in global titanium and mineral sands markets', alongside ongoing volatility in shipping and energy costs were given as reasons. The barge that was supposed to revive the shipping industry locally and help make the venture profitable ran aground in a matter of weeks in a storm and is still out of commission in Nelson. Nevertheless, this operation was given \$3 million dollars from Development West Coast citing 'a lasting legacy for future generations' ⁹ and a promised \$30 million dollars from the NZ Government/Taxpayers. NB: TCM has also been promised \$20 million dollars of public money as part of this same package for a total of \$50 million dollars. ¹⁰

It seems clear that regardless of the considerable support it has recently been given, the mining industry is a very volatile and risky undertaking, vulnerable to all sorts of overseas geopolitical and market forces, setbacks and shifts. It seems concerning to me that such companies do not appear to be solvent on their own, requiring considerable Government help to even get started. I

4 5.15 Substantive Application, Geology-mineral sands

5 <https://www.facebook.com/reel/889065463520992>

6 <https://www.theguardian.com/world/2025/jun/26/china-rare-earths-baotou-life-metallic-elements>

7 <https://www.downtoearth.org.in/environment/green-tribunal-bans-sand-mining-in-kerala-tamil-nadu-sea-coast-41938>

8 <https://www.rnz.co.nz/news/regions/west-coast/590203/westland-mineral-sands-confirms-mine-pause-40-jobs-gone>

9 <https://www.rnz.co.nz/news/business/502689/west-coast-trust-invests-3m-in-minerals-company>

10 <https://www.rnz.co.nz/news/business/679019/two-west-coast-critical-minerals-projects-get-government-funding>

understand that the Fast Track process is to facilitate projects with 'significant regional and national benefits'; rather it seems these projects come with significant risks.

The bond of \$300,000 is very low and needs to be increased. When we had the recent meeting at Rapahoe with the visiting Director for Radiation Safety and two other scientists from PHF science on 11 August 2026, it was said we 'should add an extra zero' to that bond amount.

The presence of the director and senior specialists at this meeting was evidence how seriously they were taking the issue. It was the CRRG who alerted Dr Markwitz and his office to the MSP consent: they had not been contacted by either the GDC or TCM during the consent process.

General concerns

On a more personal level, my partner and I spend a lot of time outside working and enjoying the property and the view. Along with the fact that we would eventually be directly overlooking mining operations, we are very concerned about the noise from 50 extra daily trucks on the narrow winding road.



The view from our property, looking out over some of the proposed mine site.
N.B: This photo only shows about a third of the view that would be affected.

Although a state highway, currently we experience long quiet periods and the addition of these extra heavy trucks will make a big difference to our peaceful enjoyment, especially outdoors; but also inside, as our house is not double glazed. We worry about the negative impacts and wear and tear to on our one narrow, slip-prone access road and the safety implications for ourselves and the community of sharing this road with considerably more heavy vehicles.

The enjoyment of Pakiroa/Barrytown beach is also a big part of living here. It is 17 km long, inviting lengthy walks and recreation along its span. The presence of ongoing mining operations would upset this nature-rich experience and be intrusive in a major way: visible and heard by locals and visitors in the landscape for decades to come.

Many people in the community host visitors or otherwise depend on tourism financially and it is an unknown how tourist perceptions may be affected by large scale long term mining operations.

The stress, concern and worry, waiting on tender hooks for years for an outcome that would have such a pivotal effect on so many of us, and the delayed and changed plans should also not be understated. At the first CLG meeting we were also told that preliminary building of infrastructure would take place in 2026, with mining to commence in 2027.

Many in our community have an extremely close bond with nature in general and the precious and at risk Westland Petrel/tāiko in particular. I have been a part of the voluntary community 'petrel patrol' since its inception; we put our names on a roster to go out at night to literally rescue fledglings that 'fall out' of the sky on their maiden flight from their colony high in bush clad hills behind Barrytown. I have also witnessed them as they fly back from the sea to their colonies at dusk as they hover offshore, almost assessing that the light and conditions are right before making their way in. The concern is that increased levels of industrialisation might add to the large list of threats they face; maybe just enough to alter their breeding behaviour that is already fraught with challenges. I have also observed 'downed birds' up and down the length of the Coast Road, proving that they don't just stick to a direct flight path to and from the colonies.



We have purchased a radon monitor for our home, and the fact that in some weathers and atmospheric conditions, it records unsafe 'keep away' levels indoors, demonstrates that levels of NORM are high here even without mining. We worry about how negative effects from radiation might be amplified by mining and play out in the future. Radon gas can be managed through ventilation with the build up dissipating quickly (if you know about it, and thanks to the CRRG, more people do); but even more concerning is the effects from the concentrated and separated solids transmitting through the air in the form of dust in storage and transportation, or long term contamination concerns with the return to the mine void. And the potential for increased radon gas levels accumulating in any building that might be built on previously mined land in the future.

We have concerns regarding dust inhalation and adverse radioactive effects on us and those even closer to the mining operations, particularly on women and children as the more severely affected.

It is still unclear what will happen exactly with the more concentrated and radioactive minerals from the secondary processing at Rapahoe or to what extent and in what state they will be stored, transported or returned to the mine site at Barrytown.

Whatever your view on mining, no one would argue that it shouldn't be done safely. The recently published guidelines for managing NORM safely should form the basis of conditions (if granted).¹¹

With the new projected period of operations so much increased, the risk of an AF8 event in the next 50 years is that much greater. In addition to any structural damage to the mining operations, the road could be cut off for a long time and the stranded workers needing to be accommodated, fed and looked after; would add an extra strain to an already stressful time for the community.

And like us, there are a considerable number of people in the community that are so upset at the thought of living close to or overlooking the mine that they are considering selling, particularly with the Fast Track news. That we would even consider it unbearable to remain living here to witness and live through the degradation in our quality of life, shows the degree of adverse impact and stress affecting us. Apart from the distress and disruption involved in making such a change, there is the added uncertainty of whether prospective buyer feedback will be negative, if the property value might be affected or even if we will be able to sell at all. There will be grief involved in having to leave behind all the positive aspects of a life built in this place over years.

Recommendations

Without prejudice that this application should be declined, the strongest conditions to protect the community and environment should be in place. As before, the recently published guidelines for radiation safety should be adopted completely. The conditions for the first consented block should be even stronger, as well as being appropriately reinstated where they have been dropped, considering that the scope of the project is much larger and longer with Fast Track. I won't go into detail here but these will have been covered in the CRRG and expert comments.

Thank you for the opportunity to comment.

Sincerely,
Katherine Crick



11 <https://www.health.govt.nz/publications/compliance-guide-management-of-naturally-occurring-radioactive-material-norm-in-mining-and-mineral>