

Your comment on the Barrytown Minerals Project

Please include all the contact details listed below with your comments and indicate whether you can receive further communications from us by email to substantive@fasttrack.govt.nz.

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
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Email (a valid email address enables us to communicate efficiently with you)	██		

2. We will email you draft conditions of consent for your comment			
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Please provide your comments below, include additional pages as needed.

In June 2026, as the Director for Radiation Safety (appointed under the Radiation Safety Act 2016), published a Compliance Guide for the Management of Naturally Occurring Radioactive Material (NORM) in Mining and Mineral Extraction.

The guide sets out a risk management approach and requirements for NORM management planning that a mining or minerals facility should include in its overall site health, safety, and environment management plan.

The guide applies to all operations associated with exploration, mining and processing of materials containing NORM. These operations include:

- exploration activities such as taking soil or water samples, geophysical surveys, test drilling, storing core samples, bulk sampling, excavation, and seismic surveying using explosives

- mining activities such as drilling, blasting, loading, transporting, crushing, screening and stockpiling
- processing activities such as concentrating, smelting, leaching, storing, and handling concentrate product
- disposal of waste products
- construction, commissioning, decommissioning and remediation activities.

This guide is consistent with the approach that the International Atomic Energy Agency (IAEA) outlines in its publication GSR Part 3 (IAEA 2014) and other NORM-related standards and guidance.

My expectation as head of the national radiation safety authority, is that the Compliance Guide is followed by the operator, and the consenting authorities should ensure that it is followed.

The Compliance Guide can be accessed here:

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

Dr Andreas Markwitz

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Thank you for your comments