

BARRYTOWN MINERALS PROJECT



To: Panel for the Barrytown Minerals Project

By email: substantive@fasttrack.govt.nz

Coast Road Resilience Group Inc [CRRG] Comments on the Barrytown Minerals Project - Southern Block - FTAA-2605-1238

Date: 28 September 2026

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This CRRG submission is Appendix 1, presented in conjunction with legal submissions of Ana Coculescu, barrister; and

Appendix 2: expert report of Dr John Bradley, *'Barrytown Radiation Geophysical Assessment'*

Appendix 3: expert report of Prof Glenn Banks, *Economic benefits*

Appendix 4: expert report of Mike Geddis, *Outdoor Lighting*

Appendix 5: expert report of Prof Brian McGlynn, *Wetlands and Hydrology*; and

Appendix 6: *CRRG amendments to Appendix P1 conditions of substantive application*

A. INTRODUCTION AND ENGAGEMENT WITH THE APPLICANT

1. Coast Road Resilience Group Inc. (CRRG) appreciates this opportunity to present to the expert panel for the Barrytown Minerals Project, and also the extending of this invitation to residents and property owners adjacent to the site.
2. CRRG is a local community group, established five years ago (2021) in response to an application by Barrytown JV Ltd¹ to mine on the Barrytown Flats. Consent was declined. Membership is 121, 85 of whom are Coast Road ratepayers². The CRRG aims to advocate for the wellbeing of the Coast Road community and environment. We have engaged with the various iterations of the applicant and the consenting process since 2021.
3. Members have broad expertise and include scientists, geologists, counsellors, technologists, teachers, writers, tourism operators, media professionals, farmers and environmentalists. There is a high degree of local knowledge and site familiarity, many having lived on the Coast Road for generations. Those more recent to the area are thoroughly invested and most are involved in one or more of the many community initiatives.
4. CRRG has constructively engaged with Grey District Council (GDC) and West Coast Regional Council (WCRC), and with the Office for Radiation Safety (ORS)

¹ Later TiGa Minerals and Metals Ltd, now Tāiko Critical Minerals Ltd

² The stretch of State Highway Six from Westport to Greymouth is locally known as the Coast Road

regarding concerns around resource consent applications from Tāiko Critical Minerals Ltd [TCM] and its previous iterations. We have attended the applicant's public meetings and drop-in sessions. The CRRG working group met with TCM senior management (30 June 2026) at our invitation.

5. The consent application for the Central Block was publicly notified, and CRRG participated fully in the process. The other consents (for the Mineral Separation Plant (MSP) and re-location of the Wet Concentrator Plant (WCP)) were not publicly notified so CRRG had no opportunity to participate. We therefore disagree with the applicant's statement that "*throughout the process of gaining these required authorisations, the company has undertaken extensive consultation with the local community...*"³.
6. It was the CRRG who first alerted the Director of the Office of Radiation Safety (ORS) Dr Andreas Markwitz to the MSP consent and radiation issues on the Barrytown Flats in October 2025; at that time the Office of Radiation Safety had not been contacted by either GDC or TCM during the application and consent process.
7. CRRG comments here are additional to, and in support of, our legal submission and our expert reports. We have attempted as best we can not to duplicate these, but to outline additional comments that may not be explicitly covered by expert evidence.
8. We have read the application documents relevant to our comments, and the other consents issued to the applicant in 2025 and 2026. We have undertaken Official Information Act and Local Government Official Information and Meetings Act requests to increase our understanding of the project.

³ Paragraph 6.5 Southern Block Substantive Application

B. EXECUTIVE SUMMARY

9. Key concerns of the CRRG:

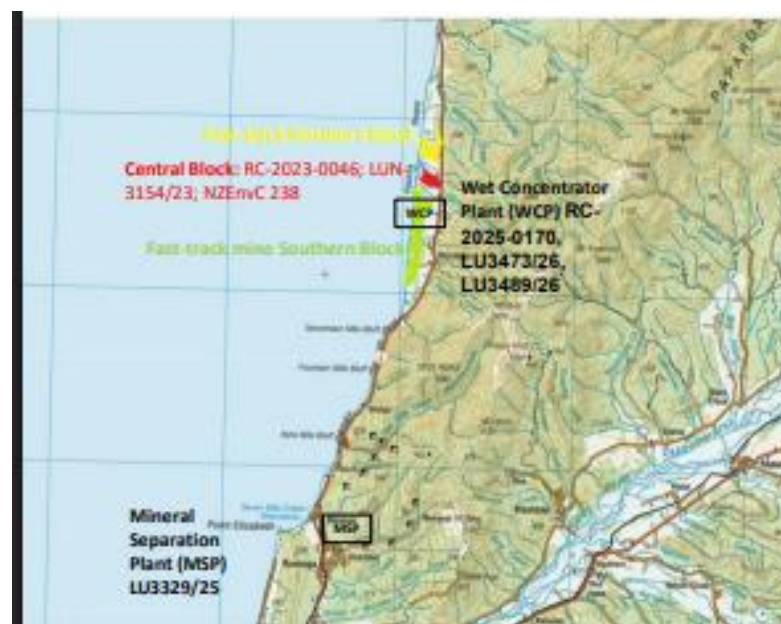
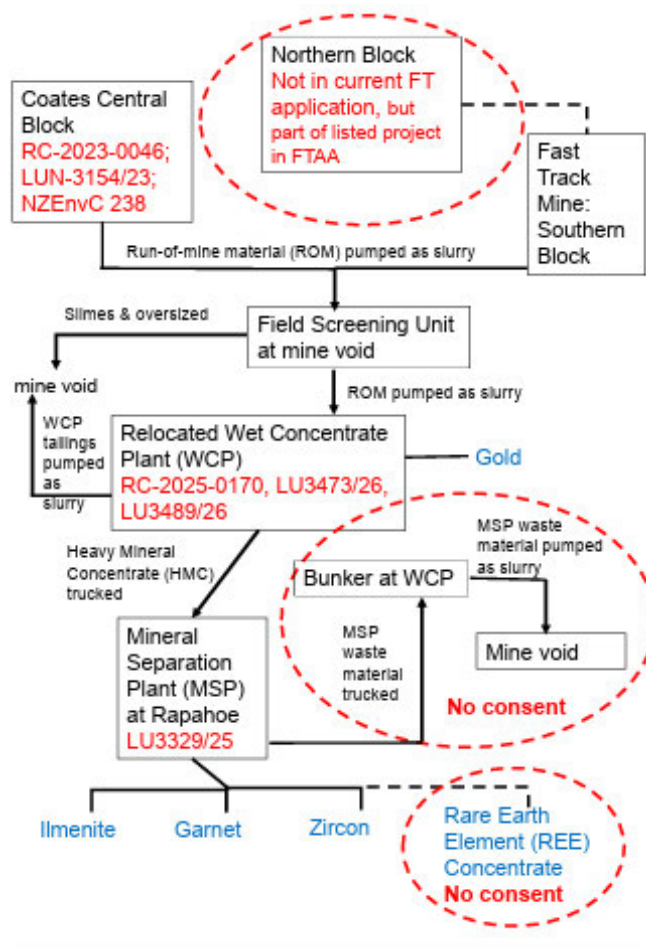
- a. Insufficient information in the application to understand how much, if any, radioactive material would be present, and how it might be used, stored and/or transported. Responsibility lies with the applicant to prove materials are safe.
- b. Issues of radiation, roading impacts, impacts on the Westland petrel/tāiko, wetlands, dust, noise, vibration and visual amenity.
- c. Economic benefit material in the application does not adequately consider costs, and benefits to the region are uncertain.
- d. This would be an unprecedentedly large industrial development for the rural-residential area of the Coast Road and would have significant social impacts.
- e. The full extent of the long-term risks, restoration, and maintenance requirements, and liability responsibilities are unknown but likely significant.
- f. This is a new industry in New Zealand, and the applicant is a new mining group that has neither built nor operated a mine previously.
- g. The applicant does not have comprehensive social licence from the Coast Road community, and the need for it is insufficiently recognised in the application.

10. CRRG submits that the project's adverse impacts and risks to the environment, community, the region's reputation, and New Zealand's brand image, comprehensively outweigh possible economic regional benefits.

C. EXISTING CONSENTS

11. Granted consents: the Mineral Separation Plant (MSP) at Rapahoe (LU3329/25), relocation of the Wet Concentrator Plant (WCP) within the fast-track application

area (LU3473/25 and LU3489/25⁴, RC-2025-0170-01), and the Central (Coates) Block for mineral sand mining and processing (RC-2023-0046, LUN-3154/23, [2024] NZEnvC 238). Below is a visual summary, generated by CRRG, of these consents in diagram and map form.



⁴ GDC sometimes labels these as LU3473/26 and LU3489/26

12. The applicant's minerals project relies on an interplay between this fast-track application and several existing resource consents issued by GDC and WCRC. It is sometimes unclear what each consent covers and if, indeed, as the applicant sometimes states, earlier consents have already addressed specific issues. The CRRG is concerned that this lack of clarity will result in consenting gaps and difficulty enforcing consents if the applicant is non-compliant.
13. Our legal submission addresses the above in further detail.

D. CONSENTING GAP

14. CRRG identifies a consenting gap not addressed in the application: consent to concentrate, store and transport REE concentrate. The implication of this consent gap creates uncertainty regarding the content of the MSP waste material. In combination with the insufficient information on both the transport of waste material from the MSP to the WCP, and the return of this waste material back to the mine void, this means the Panel lacks information critical to making a decision.
15. This incompleteness is addressed further in our legal submissions and in Appendix 2, expert report of Dr John Bradley.

E. NATURALLY OCCURRING RADIOACTIVE MATERIALS (NORM)

Radiation and Radon

16. The presence of NORM in the Barrytown mineral sands has been well established for over 30 years in the scientific literature and reports for previous mining companies⁵, and health and safety concerns around radioactivity are flagged in peer reviewed scientific literature⁶. The application does not adequately address radiation

⁵ Westland Ilmenite Ltd 1991 Environmental Assessment Barrytown Mineral Sands, West Coast, New Zealand. 193 pp. [paper copy sighted 10/09/2026]; Vidanovich, P 2008 Barrytown EP 40760 Airborne Geophysics Survey. Mineral Report Series MR4438. Prepared for New Zealand Gold Ltd. Ministry of Economic Development. Downloaded from WWW.PZPAM.GOV.NZ 30 Dec 2024, 73pp.

⁶ See Dr Bradley's Barrytown Radiation Geophysical Assessment

effects resulting from the proposal, nor does it include an application under the Radiation Safety Act ⁷.

17. CRRG members live in the community, in close proximity to the proposed mine site, to the MSP and to the mine haulage route. This is our home, and radiation – if present but not detected, measured and managed – will affect our lives, our families' lives and our livelihoods. We are concerned the application in its current form does not fully consider potential radiation impacts: there is a lack of information and a lack of processes which would enable such information to be obtained.
18. This incompleteness would make it difficult for the applicant to manage adverse effects in a way that would make continuing to live in the area safe, should there be radioactive effects.

Potential health effects and the need for a precautionary approach

19. The ORS guidelines on the management of NORM ⁸ contain recommendations for managing NORM should concentrations in excess of 1 Bq/g be detected. A precautionary approach to the monitoring and management of radiation during the mine operation in the Southern Block is warranted, especially with regard to the return of tailings and other waste material from the WCP and MSP to the mine void, as these may contain higher concentrations of radioactive material as a result of the removal of ilmenite, garnet and zircon⁹ from the HMC.
20. Evidence emerging from long term academic studies of radiation exposure from medical radiation uses, nuclear accidents (Chernobyl, Fukushima) and the WW2 Japanese atomic bomb events, demonstrates radiation risks to health are greater than previously thought and not adequately reflected in regulatory limits. Radiation risk exists below the maximum permissible doses for the public and for workers, and

⁷ In contrast to Westland Ilmenite Ltd., which in its 1991 Environmental Assessment Report, was open about the fact it had detected levels of radiation in the Barrytown sands that would need a government licence. (Westland Ilmenite Environmental Assessment Report, p98. Sighted 10 Sept 2026)

⁸ Compliance Guide: Management of Naturally Occurring Radioactive Material (NORM)

⁹ Bradley et.al, 2026 '*Radiological properties of the Barrytown placer deposit*' Royal Society of NZ journal of Geology and Geophysics March 2026 <https://doi.org/10.1002/jgo2.70050>; and Barrytown Sands Feasibility study 13 June 2023 by Palaris Australia Pty Ltd for TiGa Ltd, 327pp: <https://taikocm.co.nz/technical-studies> Accessed 26 Sept 2026.

risks associated with chronic diseases approximately double the risks associated with cancer (Ruff 2017)¹⁰. Based on the latest research findings, Nobel peace laureate Professor Ruff, a world renowned expert on radiation exposure and public health, recommends regulatory limits for radiation exposure should be set at between one-tenth and one-fifth of those currently mandated in international recommendations¹¹ and national legislation¹².

21. Children and young adults are 4-5 times more susceptible to harm from radiation exposure than adults, and women and girls are 40% more susceptible than men and boys¹³. These factors need serious consideration when developing a radiation safety plan for the mine operation and special consideration may be warranted for monitoring radiation levels around the school in Cargill Road and properties with children adjacent to the mine site.

22. CRRG has made the applicant aware of the level of concern and uncertainty in the community around radioactivity and its health effects¹⁴, and that at least one Rapahoe resident has taken the initiative and organised pre-mining health checks for their child. We asked the applicant if they would be willing to fund ongoing health care if health issues connected to radioactivity evolved and they expressed willingness.¹⁵ The application does not include this commitment to the community.

23. The CRRG requests that the fast-track panel recommend/appoint an independent advisor to ensure the panel receives comprehensive and independent technical advice on the assessment of radiation, and the development of a radiation management plan. These changes are included in the consent conditions for the Southern Block Mine along with a request to be consulted on radiation management

¹⁰ Ruff, TA 2017 Health implications of ionising radiation. Chapter 8 (pp 221-260) In: Learning from Fukushima (Eds: Peter van Ness & Mel Gurtov) Nuclear Power in East Asia. Australian National University Press

See also Professor Ruff expert witness statement "Radiation health impact of proposed Fingerboards Mineral Sands Mine Project, Glenaladale, Victoria" <https://docslib.org/doc/284555/assoc-prof-tilman-ruff-melbourne-school-of-population-and-global-health-university-of-melbourne> Accessed 12 Sept 2026

¹¹ For example, the International Atomic Energy Agency (IAEA)

¹² (0.1-0.2 mSv¹²/yr public exposure limits compared with 1mSv/yr in NZ and Australia).

¹³ Professor Tilman Ruff, Expert witness statement: Radiation health impacts of proposed Fingerboards Mineral Sands Mine Project, Glenaladale, Victoria. February 2021. Quoted with permission (emails 15 Oct 2025) tar@unimelb.edu.au

¹⁴ 30 June 2026 meeting between CRRG working group and Michael Meehan and Robert Brand of TCM

¹⁵ ibid

via representatives on the Community Liaison Group and an independent technical advisory group which both informs and represents community interests. See our document 'CRRG amendments to the applicant's proposed conditions'.

24. Radiation concerns are further addressed in our legal submission and the expert report: Barrytown Radiation Geophysical Assessment.

F. ECONOMICS

25. The economic impact assessment does not address any costs to the locality, the region or New Zealand resulting from the proposal. For example, potential risks to both small and large-scale local tourist ventures; potential risks to public health and to the transport route.

26. The applicant's economic assessment overstates the benefits by not addressing negative economic impacts and liability risks.

27. International events over recent months have clearly demonstrated the volatility of global commodity markets and the dramatic reliance of New Zealand on overseas provisioning of diesel. Commodity markets for the proposed mineral suite are linked to global GDP growth rates¹⁶ and the cost of extracting these commodities is impacted by the cost of diesel for construction and for operation of mining equipment, trucking, rail and shipping, so is a major input and therefore cost driver. Both are significant to the economic viability of the venture, and directly affect profitability, corporate taxes and royalties.

28. A similar mineral sand mine, operated by Westland Mineral Sands (WMS) at Cape Foulwind, went into care and maintenance in March 2026. Substantial economic benefits promised to the region for port development and resilience have not materialised. The WMS barge, the Manahau, intended to transport product from Port Westport to Port Nelson for export, remains detained in Port Nelson by Maritime NZ, two years after running aground after only one voyage.¹⁷

¹⁶ The TCM application states 4.5 *'The mineral sands industry is characterised by long-term producing assets with demand for its products closely following global GDP growth.'*

¹⁷ https://www.rnz.co.nz/news/regions_nelson/1286839/barge-detained-and-still-awaiting-repairs-two-years-after-grounding

29. Mining automation technology in the Asia Pacific region is projected to achieve growth in the upcoming years.¹⁸ Replacing human effort with technology and automation in the operation of plant and equipment could achieve a major reduction in the cost of mining. Labour substitution could cause a reduction in labour demand, decrease mining wages, and so generate less wealth in mining regions.¹⁹ The application does not consider ways in which this accelerating industry trend might affect the cost benefit equation.

30. Sense Partners conclude “*Impacts on visitor numbers are unlikely to be material*”²⁰ but this is not borne out by the CRRG survey of 2023²¹ which indicated exactly zero percent of tourists came to the West Coast in the hope of viewing a mine. They visited primarily for natural landscape and wildlife, all of which would be adversely affected by this industrial activity. A clear majority indicated a mine would make them less likely to visit.²² This view was strongly repeated by several submitters on what was a much smaller mine proposal than this one.²³

31. Sense Partners point out the mine area is “*miniscule*” compared to the West Coast’s many hectares of natural landscape. However, CRRG submits that the reputational damage incurred by the establishment of an industrial operation alongside what is currently cited as one of the ten best coastal drives in the world, using that drive as a mining haulage route, would be disproportionately and adversely significant.

¹⁸ <https://www.businesswire.com/news/home/20220729005174/en/Global-Mining-Automation-Market-2022-to-2027---Featuring-Caterpillar-Komatsu-and-Hexagon-Among-Others---ResearchAndMarkets.com>

¹⁹ <https://www.sciencedirect.com/science/article/abs/pii/S2214790X21000046#:~:text=The%20rise%20of%20automation%20and%20robots%20are,likely%20to%20exacerbate%20in%20the%20coming%20future>

²⁰ Appendix L1 of FTAA Application, p6

²¹ For TiGa resource consent hearing Feb 2024: ‘Lay witness Statement on Tourism’, Lee Harris

²² “A small survey undertaken by CRRG Nov 2023 – Jan 2024, at tourist stopping points and accommodation on the Coast Road ... indicated visitors advised caution, and 69% indicated the presence of mining ... near the Coast Road in Barrytown would either definitely (32%), probably (5%), or maybe (32%) affect their decision to travel to the West Coast. ... 66% indicated the presence of three or more truck and trailer units per hour between 7am and 10pm on the Coast Road would either definitely (38%), probably (14%), or maybe (14%) affect their decision to visit the West Coast.” - Lay witness Statement on Tourism, Lee Harris Feb 2024.

²³ For example submitter #96 Andrew Stillie: “If the mine goes ahead, we will be cancelling [our] trip” and Submitter #105 Richard Fulford: “I have decided, in protest, to abstain from visiting New Zealand until I can be reassured the mine will not go ahead in this environmentally sensitive area.”

32. The report does not clearly identify costs of ensuring appropriate conditions to address radioactive waste transport and disposal.
33. The application for the existing mining consent on the Barrytown Flats by TIGA in 2023 contained a Sense Partners economic assessment (Att R from TiGa's 2023 application) estimating substantial export revenues (\$63 million a year) from the mining operation on the 63ha block. At a meeting with community members in 2025 to explain the expansion plans for the rest of the Flats (now this application) a TCM representative said a consent to mine the entire Barrytown Flats was essential as on its own, the 63ha block would not be economic. This made it clear the financial projections for that application were incorrect. CRRG is very concerned that, given the gaps in the economic impact assessment, TCM is not fully transparent with the Panel and the public as to the economic viability of this proposal.
34. The Sense Partners report states (Pt28, p4) that export receipts will be made up from ilmenite (59%), garnet (36%), zircon (2%) and critical minerals concentrate (3%). The application before the panel does not include the export of critical minerals concentrate. It specifies only ilmenite, garnet, zircon and gold.

G. WESTLAND PETREL/TĀIKO AND OTHER WILDLIFE

35. TCM's long-term mining and processing operation risks adverse effects on the endangered Westland petrel/tāiko, which breeds nowhere else in the world: its sole breeding grounds are located in the Paparoa foothills at the northern end of the Barrytown flats. Adverse effects include the well-documented and undisputed artificial light distraction threat that often results in groundings, and unknown behavioural disturbance from the presence of an industrial operation.
36. In 2024 CRRG appealed to the Environment Court on the decision to grant resource consent for the Central Block. Along with Forest & Bird and the Department of Conservation supporting our appeal, we reached agreement on several key conditions during mediation to avoid impacts on the Westland petrel. Many of the conditions of [2024] NZEnvC 238 have not been carried over to this fast-track application. Specifically:

- a. Condition 3.2 of [2024] NZEnvC 238;
 - b. The full suite of lighting conditions of 16 [2024] NZEnvC 238 is not in condition 17 of the application's conditions (Appendix P1)²⁴;
 - c. The full suite of avian management conditions of 18 [2024] NZEnvC 238 (including conditions detailing the response to Westland petrel interactions) is not in condition 13 of the applicant's conditions (Appendix P1) ²⁵.
37. CRRG submits an addition to the avian management plan (AMP), with requirements for all drivers: staff and contractors.
38. CRRG submits changes to the application's condition 13.9d (Appendix P1) for Department of Conservation comment on amendments to the Avian Management Plan (AMP). This is proportionate to the effects on the birds and the fact that the protective measures are embedded in the AMP.
39. The application does not include the use of a specially trained Westland petrel dog, as set out in [2024] NZEnvC 238, 18.12: "the use of a *specially trained Westland Petrel detection dog (if available)*". This would be a valuable investment to inform adaptive management and avoid adverse effects on the Westland petrel from this long-term operation with its unknown impacts. A detection dog would also be highly valuable during the fledgling season to undertake search and rescue in the wider area in conjunction with the community petrel patrol. This could have been initiated in the past two years and would contribute to meeting the stated intent of 8.13 Southern Block Substantive Application: "*The Project will deliver a range of positive environmental outcomes... Tāiko has committed to...conservation initiatives, and research into key species such as the Westland petrel (tāiko)...This collaborative approach, which will also involve the Department of Conservation, specialist wildlife trusts, academic institutions, local authorities and the wider community, will contribute to improved ecological knowledge and targeted conservation outcomes.*"

²⁴ Nor is the full suite in condition 61 of LU3473/25 and LU3489/25

²⁵ Avian management does not feature in LU3473/25 and LU3489/25

40. We note there would be fixed lighting in the mine area according to 6.120 Southern Block Substantive Application, whereas 5.2.2 Appendix M2 Avian Management Plan is less clear. This demonstrates the need for a Lighting Management Plan to identify all fixed and mobile lighting, and to design and operate lighting to avoid adverse effects on the Westland petrel. We refer the panel to Appendix 4: expert report of Mike Geddis on Lighting and Lighting Effects.
41. Mr Geddis's report covers lighting design principles and guidance that should be followed to develop a Lighting Management Plan in order to minimise impacts on nocturnal wildlife such as the Westland petrel. His report has been shared with the Westland Petrel Conservation Trust.
42. CRRG includes committed members of the Community Petrel Patrol, rostered daily to check beaches, rivers, streets and the highway late at night for downed petrel fledglings early November to mid-January. The patrol rescues about 50 birds each season, also recording around 15 fatalities (almost all on the State Highway)²⁶. Most groundings can be directly attributed to light distraction from buildings and vehicle headlights. The number of rescues and fatalities clearly demonstrate the baseline risk to the endangered tāiko from land-based threats is already considerable and further impacts must be avoided.
43. The Coast Road community has a strong connection to the Westland petrel and the birds form part of our local identity. The survival of this petrel depends on us, and we are committed to doing all we can to avoid and minimise adverse effects. In addition to the patrol, this includes closing curtains at night; avoiding outside lights; avoiding driving the high risk section of the Coast Road at night during fledging season or at least reducing speed and keeping a lookout for downed birds on or near the road and rescuing them; advocating for better light protection measures and for rapid emission reduction.
44. The Department of Conservation has clearly outlined concerns regarding the tāiko, and we support these comments. We also endorse Forest & Bird comments, and their Westland petrel expert Dr Susan Waugh.

²⁶ The News 22 January 2026 "45 Taiko Rescued" [Around 75 were rescued the previous fledgling season]

45. We also support the comments of the Department of Conservation and the West Coast Penguin Trust regarding other native fauna. We also note the AMP does not include predator control.²⁷

H. WETLANDS AND WATERWAYS

46. While acknowledging the 50ha area the applicant has proffered to restore as a wetland, CRRG submits that there exists an opportunity for all land post mining to be re-naturalised to wetland/ native vegetation rather than returned to agriculture. This would provide for wetland, waterway, biodiversity and carbon emission offsetting, mitigation of adverse water quality effects, adaptation to the effects of climate breakdown and partial community compensation for the adverse social effects from the presence of a long-term industrial activity. Our case for re-naturalisation is supported by wetland and hydrology expert Professor Brian McGlynn who provides an expert report to the panel, Appendix 5. Professor McGlynn's report has also been shared with Forest & Bird, whose comments we endorse.

47. Rehabilitation of the land to pasture for agricultural production is not predetermined and other public good land uses should be considered. This would be in line with TCM's thinking based on statements by CEO Robert Brand when meeting with the CRRG working group ²⁸. When discussing post mining land uses, Robert Brand stated twice that he did not expect the land to return to dairy.

48. Re-naturalisation of all land post mining provides TCM with the opportunity to demonstrate its intent *"to undertake leading sustainable environmental practices"*, and *"to be an exemplar sustainable business"* - Southern Block Substantive Application 2.7, 2.9.

49. TCM has entered into sale and purchase agreements with the current landowners covering the project area, and therefore land tenure would present no barrier to re-naturalisation.²⁹

²⁷ Condition 18.4 NZEnvC238 Consent Order

²⁸ Tuesday 30 June 2026

²⁹ Refer s5.14 Southern Block Substantive Application.

50. Re-naturalisation could proceed through a combination of fully/partially reconstructed wetlands and native planting by TCM, alongside passive native re-vegetation and TCM-funded community planting days.

51. Should the panel decide to grant the application and agree to re-naturalisation, we submit that the land would be best held in a community trust. Refer to Appendix 6: 'CRRG amendments to the applicant's proposed conditions'.

52. The Department of Conservation has outlined their concerns regarding wetlands, and we support their comments.

I. CLIMATE BREAKDOWN IMPACTS AND CARBON EMISSIONS

53. The latest UN report to date states the world will now inevitably cross the 1.5C warming threshold within the next few years, but there is still time to take steps to minimise by how much this threshold will be crossed ³⁰.

54. The applicant has not disclosed carbon emissions resulting from the project and has not prepared an emissions reduction plan to identify where savings could be made as would be in line with their stated intent "*to undertake leading sustainable environmental practices*", and "*to be an exemplar sustainable business*"³¹.

55. The decisions version of Te Tai o Poutini Plan (TTPP) includes the strategic objective (our emphasis in bold) '**CCR - P5 Support, at a local level, reduction in emissions of greenhouse gases, including through providing for low carbon transport options such as walking, cycling and electric vehicles**'.

56. The lack of an emissions report and reduction plan means the application's emissions reduction credentials cannot be measured by the public, including the market.

³⁰ <https://www.unep.org/resources/limiting-overshoot-navigating-exceedance>

³¹ Southern Block Substantive Application 2.7 and 2.9

57. Carbon emissions from diesel use in mining equipment and trucking over the 14 year fast-track mining period can be estimated from Stats NZ published data. Based on the applicant's additional GDP of \$122.7 million pa (Table 1 Appendix L1) and the West Coast emission intensity of 386 tonnes CO₂^e/\$million GDP³² (one of the highest regions), the ballpark emissions are 47,362 tonnes CO₂^e pa. Over the anticipated 14 years of fast-track mining this is a ballpark 663,068 tonnes CO₂^e
58. In 2023, the US EPA released an update of its estimate of the social cost of carbon (SCC) of US\$190 /tonne ³³. Other sources estimate SCC to be higher at US\$800 in 2025 ³⁴. The estimate for SCC has been on a rapidly rising increase since 2015. Based on current estimates of SCC in the 2020s, this equates to a SCC range for the fast-track project of US\$126 - US\$530 million over the 14-year mining timeframe (but likely to be higher still as the SCC continues to rise).
59. CRRG submits that emission intensive economic growth is untenable, false economics and fails younger and future generations. The West Coast ranks third highest of NZ regions in emission intensity, partly due to the mining industry. We suggest TCM re-apply when able to demonstrate the full life cycle of the project has net zero emissions.
60. CRRG's proposal of re-naturalisation of the land post-mining would only contribute to offsetting these emissions in future years with a time delay of more than a decade before carbon sequestration in native vegetation becomes significant. Additionally, the Emissions Trading Scheme cannot be relied on as the main tool in reducing emissions because since its inception it has failed to do this, as evidenced in research by the Parliamentary Commissioner for the Environment ³⁵.
61. New Zealand remains a party to the Paris Agreement and, under that international agreement, has made a commitment to meet its Nationally Determined Contribution (NDC) including by implementing emission reductions in other countries. New

³² <https://www.stats.govt.nz/information-releases/greenhouse-gas-emissions-by-region-industry-and-household-year-ended-2025/>

³³ https://www.epa.gov/system/files/documents/2023-12/epa_scghg_2023_report_final.pdf

³⁴ <https://ideas.repec.org/p/arx/papers/2402.09125.html>

³⁵ PCE: *Adrift: What future does the Emissions Trading Scheme have?* (Aug 2026), chapter 6 (p52 and following) and chapter 7 (p56)

Zealand is currently not on track to meet the NDC³⁶. New Zealand currently has an obligation to pay for any emissions above the NDC through offshore mitigation, with Treasury reports showing the cost of covering that shortfall around NZ\$5bn³⁷. This has a real financial cost to New Zealand and all New Zealand taxpayers.

62. The application would contribute directly to those emissions. The application would add its emissions to those already accounted for in the economy. The application has not included in its economic impact assessment an assessment of its carbon footprint across the life of the mine (emissions from the set-up, operation and rehabilitation of the mine) or any mitigation for those emissions. The economic impact assessment for the application does not include a discussion of the economic cost to the New Zealand economy of the country paying for offshore mitigation for the project's emissions, across the life of the project.

63. Under section 85(3) of the FTAA, an application may be declined where adverse effects are so significant that they are disproportionate to the benefits of the Project. **We put to the panel the adverse economic impacts of the carbon emissions are out of proportion to the regional benefits, and the application should be declined.** If the application is granted the cost of covering the emissions through offshore mitigation will fall on the New Zealand taxpayer.

³⁶ PCE: [*Adrift: What future does the Emissions Trading Scheme have?*](#) (Aug 2026), chapter 6 (p52 and following) and chapter 7 (p56)

³⁷ NZ Treasury, Technical Annex to New Zealand Treasury Paper 26/01: *New Zealand's Nationally Determined Contributions – Potential Fiscal Costs Associated with Offshore Mitigation* (June 2026)

64. The southern section of the Barrytown beach adjacent to the application area is subject to active and at times severe coastal erosion, likely intensified by climate breakdown. The application area is located only 50m from Mean High Water Springs (MHWS) and within the Coastal Environment and Coastal Inundation and hazard overlays of the TTPP. Mining would likely exacerbate coastal erosion through land disturbance, even with the western boundary returned to its current ground level. It is therefore difficult to accept the claim in 6.91 Southern Block Substantive Application: *“Restoring this area to its natural elevation maintains the existing buffer between the active coastal environment and the inland mined area and future farmland. This helps to ensure that the rehabilitated land is not at increased risk from coastal hazards such as erosion or ponding from storm surge events.”*

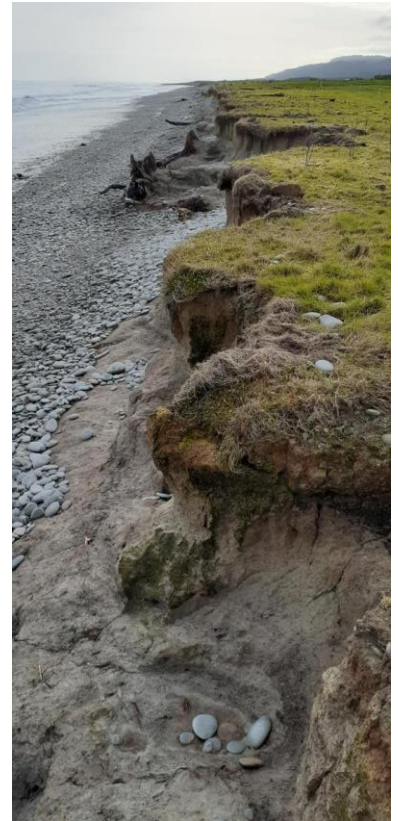


Photo above: *Typical Barrytown Beach erosion*

65. CRRG submits a 100m setback from MHWS in Appendix 6: CRRG amendments to the applicant's proposed conditions.

J. TRANSPORTATION

66. The application does not consider the longer-term transportation impacts of the relocated WCP, and this extended proposal. The Central Block consent term is 12 years with an anticipated mining period of six years, consent conditions prevent the WCP from processing materials from outside the consented area, and removal of the WCP is required before completion of the consent term.

67. This application anticipates 14 years of mining and seeks a 35-year approval, so the timeframe of truck movements from the re-located WCP would be two and half times greater.

68. We therefore disagree with 6.5 Southern Block Substantive Application: *“It has also enabled the assessment and approval of high interest matters, such as trucking activities on State Highway 6 through a local process. As a result of these activities already holding resource consents, this Fast-track application is focused on seeking all necessary resource consent approvals for the mining activity within the Southern Block...”*.

69. The applicant has not sought consent to transport potentially radioactive waste material back to the mine for rehabilitation and this is not covered by existing consents.

70. In Appendix 6, the CRRG recommendations to proposed conditions, we have copied across the full suite of transport conditions from the Central Block consent and submit they should all be included in this application.

71. We discuss only effects additional to the 2024 Central Block consent.

Increase in heavy vehicle traffic

72. The projected increase in heavy vehicle traffic is much more significant than acknowledged during the Feb 2024 TiGa resource consent process, when reports cited the Canoe Creek Road counter as showing average daily vehicle movements of 786 vehicles, 11% [88] of which were heavy vehicles. The application, at 50 trucks per day, was said to increase heavy vehicle traffic by 57%.³⁸

73. This data gives the misleading impression that these heavy vehicles would be milk tankers, trucks, and/or truck and trailer units: that is, comparable to 50 tonne TiGa haulage trucks³⁹.

³⁸ E.g. Mike Harding Review - Terrestrial Ecology 116, p21 referencing Annual Average Daily Traffic data, NZTA

³⁹ Estimated total of loaded truck & trailer with 30 tonnes HMC plus approx. 20 tonnes empty weight

74. However, the Land Transport Act defines ‘heavy motor vehicle [as] a motor vehicle ... having a gross vehicle mass exceeding 3,500 kg’⁴⁰. Thus, a campervan such as that pictured here triggers the ‘heavy vehicle’ definition in the telemetry data.



Weighing in at 3500kg, the Eura Mobil Pro T 725 QB gets by on a WOF and can be driven on a Class 1 car licence

75. For comparison, CRRG conducted a formal survey of all vehicles using the Coast Road on a Tuesday, Friday and Saturday.⁴¹

76. On Saturday 27 July 2024, during the hours the applicant intends to truck HMC at the rate of up to five trucks per hour to a total of 50 daily, the number of actual heavy vehicles was only thirteen. On that sample Saturday, the increase in heavy vehicles would be from 13 to 63 i.e. approximately 400%. Given road safety, noise and vibration concerns, CRRG considers this an unacceptable imposition on other road users and on residents.

77. On Friday 2 Aug 2024, during proposed trucking hours, heavy vehicles totalled 50. The applicant would double adverse heavy traffic effects on such a day. And on Tuesday 6 August 2024, we recorded 70 heavy truck movements. Therefore, even on this busier day, TCM’s trucks would increase adverse effects by 70%.

78. The actual effects of increased heavy traffic on our coastal residents would therefore be much greater than formerly calculated. And with this proposal those increased effects would be further exacerbated by the extended length of the mining period and the use of the highway as a mine haulage route beyond many of our lifetimes.

79. The noise, vibration and traffic volume impact would be significant for local residents who live along the route, use it to travel to work and services, and who cycle and walk

⁴⁰ https://www.legislation.govt.nz/act/public/1998/110/en/latest/?utm_source=gemini#DLM434530 s 2(1)

⁴¹ CRRG SURVEY METHODOLOGY: 1. Observers used two observation points: 2706 and 2828 Coast Road, both on the haulage route and each with a clear view of traffic in all conditions; recorded all vehicles, both northbound and southbound, on data sheets, then collated results. 2. Observers used sample photos to categorize vehicles. 3. We recorded all vehicle movements during the hours the applicant intended to transport HMC i.e. 30 mins. before sunrise to 30 mins. after sunset [reduced to sunrise to sunset through later mediation]. 3. If observers were unsure whether a vehicle was a heavy vehicle [HV], where HV was a heavy truck, truck & trailer, 45-seater bus, milk tanker, furniture truck, hay truck, coal truck, livestock truck, fire engine, it was counted as a heavy vehicle. 4. Personnel worked in shifts: Katherine Crick, Chris J Cromey, Marie Elder.

along it [locals and visitors]. CRRG submits the applicant should be required to minimise these effects by limiting trucking to Monday to Friday (within the meaning of the RMA). A similar condition was imposed for the Westland Mineral Sands mine at Cape Foulwind.

80. It would also be appropriate for TCM to fund widening of the Coast Road to provide a rideable road shoulder on high-risk sections of the Coast Road as identified in the 2024 TiGa RMA hearing. It need only be about 0.5m wide to allow cyclists to ride left of the white shoulder line and avoid vehicles having to cross the centre line, minimising collision risk when overtaking cyclists.

The highway and social licence

81. For Coast Road residents, this vulnerable highway is the single lifeline to all services, supplies, work, education, social connections and recreation. Envisaging its use as a mining haulage route is one reason TCM does not have a credible social licence to operate. Of the 198 individuals who in 2023 submitted against resource consent for the Central Block, 155 already had significant concerns around trucking.

82. It is a fragile and high maintenance road, narrow and winding, with tight geometry forcing heavy truck and trailer units to cross the centre line, a single-lane bridge and a high proportion of no-passing and no-overtaking stretches, constantly requiring repair, and subject to frequent slips and subsidence.⁴²

83. Major concerns include damage to the infrastructure, exacerbated by a significant increase in heavy trucks, safety issues for both truck drivers and all other road users [motorists, cyclists and pedestrians], and noise, dust and vibration.

The damage heavy vehicles cause to roads

84. The applicant has not included in its economic impact assessment the cost of maintaining roads used for mining haulage. Such costs are not always covered by Central Government through road user charges and fuel taxes, but by local councils.

⁴² SH6 safety issues in May 2021 Stuff article headlined "[*The West Coast's Deadly Roads*](#)"
CRRG Comment to fast-track expert panel Barrytown Minerals Project Sept 2026

A discrepancy between the cost of damage heavy trucks cause and the amount they contribute to road repairs is explored in reports.⁴³

85. Tellingly, a 2024 report of road damage near Westport caused by haulage trucks cited \$54,000 worth of damage in two months for which, according to Buller District Council, “*ratepayers are footing some of the costs*”.⁴⁴

Seismic risk

86. The vulnerability of this stretch of SH6 to natural hazards means frequent road closures and delays due to slips, rockfall and flooding. A major earthquake such as the Alpine Fault Level 8 (AF8) would render SH6 impassable due to landslides, and bridge and road collapse⁴⁵.

87. The likelihood of such an earthquake occurring in the next 50 years is put at 75% and an 80% chance of its being magnitude 8+⁴⁶.

88. [West Coast Emergency Management documentation](#)⁴⁷ [map and detail p32], shows repair to this stretch of SH6 has not been accorded a priority level. This means plans need to be made by and for residents, businesses and staff on the assumption the Coast Road, including the proposed haulage route, would remain closed in perpetuity. The application does not contain such emergency plans.

⁴³ For example: <https://www.scoop.co.nz/stories/PO2212/S00111/trucks-do-the-most-damage-on-our-roads-but-pay-the-least-towards-fixing-them.htm>

⁴⁴ ‘\$54,000 damage’ The [Westport] News 23.08.24. This damage occurred in only two months of haulage.

⁴⁵ This massive (8+ on the Richter scale) earthquake historically occurs on average every 260 - 300 years. The last was in 1717 so another is overdue.

⁴⁶ <https://www.af8.org.nz>

⁴⁷ <https://westcoastemergency.govt.nz/wp-content/uploads/2018/04/Main-Report.pdf> Map & detail p32

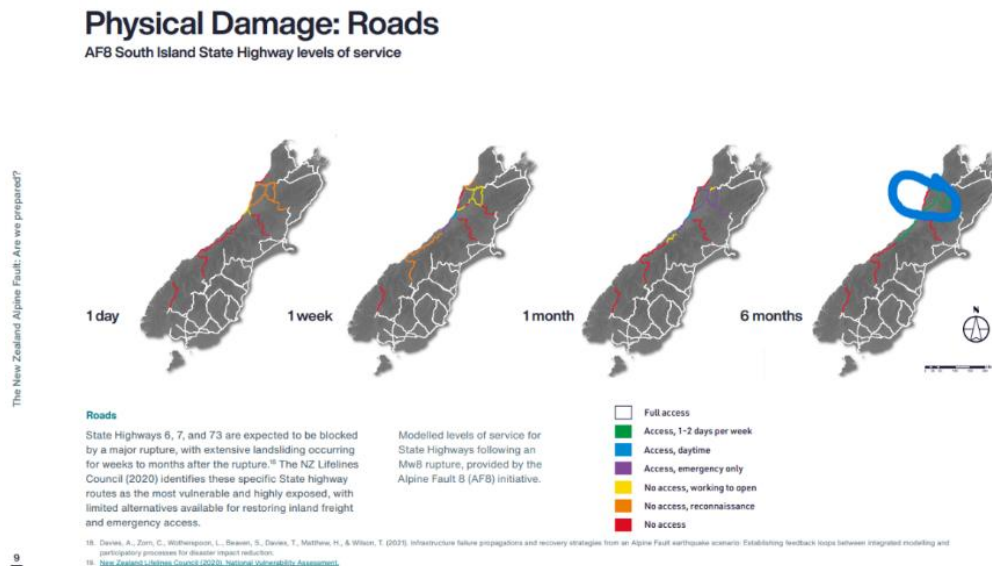


Figure above: <https://aon.co.nz/AonNZ/media/Docs/28391-The-New-Zealand-Alpine-Fault.pdf> Slide 9. The proposed haulage route is circled in blue on the '6 months' projection; the road is coloured red. 'No access' in the key means no repairs can be expected within six months.

89. The application contains no details around natural hazards impacting transport to and from the mine, including impacts on the ability to store mined materials until the road re-opens and it can be transported from the mine site. TCM might be left unable to transport their product, indefinitely. This seismic risk would have severe economic implications which the application does not appear to have considered in the economic impact assessment.

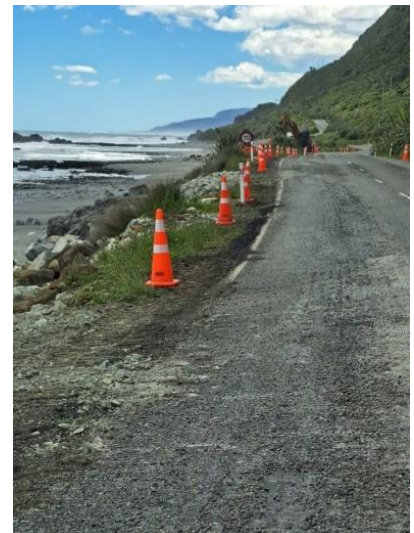
90. The following six photos show some of the existing risks posed by the proposed haulage route: slips affecting the stability of the road; rockfall from above impacting road access; flooding affecting road stability.



Above, photos 1 and 2: sections of TCM's proposed trucking route between the WCP and extended Barrytown Flats mine site, and the MSP in Rapahoe.



Above left, photo 3: aerial view of Waianiwaniwa /Ten Mile Creek showing tight geometry
 Above right, photo 4: rockfall above Waianiwaniwa / Ten Mile bridge 30 July 2022



Above left, photo 5: a costly 2023 repair to structural integrity of SH6 edge just north of Waianiwaniwa/ Ten Mile. Note the ongoing impact on the width of the shoulder, leaving a pedestrian, cyclist or motorist nowhere to go if needing to avoid an oncoming or overtaking vehicle.

Above right, photo 6: recurring SH6 disintegration just north of 13 Mile, caused by heavy rainfall, sea incursion and heavy traffic use. Photo 24 Nov 2023.

K. NOISE

91. The local community is highly concerned about noise, and vibration impacts on wellbeing, businesses and livestock. The current low baseline levels of noise are a key feature of the area and low noise levels contribute significantly to why people choose to live here and run their businesses, including B&Bs and outdoor tourism experiences.

92. The dominant ambient soundscape is the Tasman Sea, but this is a natural sound, almost like music, and should not be equated with noise. There is a reason we say, “the sound of the sea” and not, “the noise of the sea”. Industrial mining and

processing noise and vibration is intrusive, and the sound of the sea does not mask industrial noise from the likes of diggers, front end loaders, dredges, trucks, and the pumping of ore and slurry..

93. The applicant suggests noise from the mine would only be audible during quieter periods and would remain acceptable to residential amenity “*with no unreasonable noise emissions anticipated*”⁴⁸. This statement contradicts itself: if it is audible during quieter periods, then it is unreasonable. Awareness of noise from a large industrial mining operation will be vastly different to the current surf sound, intermittent farming noise and traffic noise on the highway, often with long quiet periods. A significant change is anticipated which is not acceptable or reasonable to the many who live within earshot. It might not be until 2053 -2056 when Barrytown residents can once again enjoy an environment free from industrial mining – beyond many residents’ lifetimes.

94. Furthermore, even the applicant acknowledges: “*the highest noise levels are predicted when mining occurs closest to dwellings along Warren Road and Cargill Road*”⁴⁹. This is close to the highest population densities in the area.

95. Despite the Noise Management Plan setting out what it describes as ‘*appropriate*’ day and night-time limits of 55 dBL and 45 dBL respectively to ‘*protect residential amenity*’⁵⁰, few would argue that living adjacent to a long-term mining operation could result in similar or lesser noise effects. Therefore, the measures cannot be described as protecting rural amenity. The natural character that has drawn many to settle here, and to enjoy being and working outdoors, would be seriously affected by industrial scale, long term mining. Noise effects will also be worse indoors.

96. Double glazing would help mitigate noise effects: see Appendix 6: ‘CRRG amendments to the applicant’s proposed conditions.

⁴⁸ Substantive application, Noise effects, 8.71

⁴⁹ Ibid, 8.68

⁵⁰ Noise assessment, p3

L. DUST

97. The application lacks expert evidence on dust, and its dust management plan (DMP) has been written by a non-expert without expert peer review. The DMP uses Westport meteorological data as a proxy for local Barrytown Flats conditions, so neither the rainfall nor the wind rose data presented are representative of Barrytown conditions.
98. Dust concerns continue to be an issue for CRRG, as a nuisance and as a source of dissemination of radioactive or otherwise contaminated material. This needs monitoring and management for which we have suggested amended conditions.⁵¹
99. Based on our local knowledge, Barrytown conditions mean there is a high risk of dust effects, particularly with the locally feared easterly wind. Exposed surfaces, such as an area prepared in front of the dredger, have potential to generate dust during periods of low humidity combined with the gale-force gusty easterly winds which dry out surfaces very quickly, creating dust as well as causing damage to buildings. CRRG continues to seek reassurance from the applicant that the local easterly wind is acknowledged and planned for in all aspects of the application, particularly pertaining to dust.
100. CRRG continues to have doubts as to the effectiveness of the dust monitoring gauges in the DMP and seeks reassurance from the applicant as well as the WCRC that these gauges are widely proven. The dust monitoring gauges typically have a miniscule sampling area (mouth diameter of 10 cm) relative to the scale of a suspended dust 'cloud', which may be tens to hundreds of metres wide or long depending on size of the dust source, wind speed and direction. There is also a vertical scale to this cloud, yet the sampling point of the gauge is a fixed distance above the ground.
101. The exact location of dust deposition gauges will be critical in determining sampling effectiveness. As wind increases above the nominal threshold for dust suspension presented in the DMP (approximately 22 km/hr), so does the turbulent nature (gustiness) of the wind, resulting in variable wind direction. Gusty wind may

⁵¹ Appendix 6: CRRG amendments to the applicant's proposed conditions

cause dust to pass to one side or above the monitoring point resulting in an empty gauge. These dust monitoring problems were demonstrated by a simple dust transport model in the CRRG lay witness dust statement for the public hearing of the RMA TiGa Central Block application.⁵²

102. It can be seen from the applicant's DMP (Figure 3, p7), that from the location of the Wet Concentrate Plant in a southerly direction to the Cargill Road area, the mining disturbance area is close to the boundary. Sensitive receptors are generally much closer to the mining disturbance area along this boundary and effective dust monitoring will be critical there.

M. RURAL CHARACTER CHANGE

103. Members of the local community have expressed considerable concern about the change in rural character presented by long-term industrial mining and processing. Enjoyment of the coastline is a significant part of living here and the valued Barrytown beach adjacent to the mine site is well used by visitors and locals for recreational purposes including walking, swimming and fishing. The experience of naturalness would be degraded by mining's visual, noise and vibration impact.

Access

104. The main access to the beach is Cargill Road, both sides of which TCM plan to mine at the western end with only 20 metre setbacks and only 50 metre setbacks from Mean High Water Springs along the extent of the mining area adjacent to the coast. Many people choose to recreate with walks along Pakiroa Beach, and inevitably they would encounter adjacent industrial mining activity on this long stretch: a very different type of experience to the one visitors and locals currently enjoy.

Visual effects

105. Currently the area has a bush backdrop, with views out to the Tasman Sea over green farmland and forest remnants, with the occasional farm vehicle moving through

⁵² *Lay witness statement on Dust* – Chris J Cromey February 2024

the landscape. Compare this to the sight and march of successive 16ha mining strips and heavy machines working sunrise to sunset, six days a week, for some 14 years.

106. The application acknowledges “*Residential lifestyle development*”⁵³ between the eastern borders of the Southern Block and the highway and states these properties will be separated and screened from mining by a thin strip of the consent area left undisturbed, by farmland and “*various vegetation*”⁵⁴. It does not mention the growing number of properties on the eastern side of SH6, often elevated with stunning views out to the Tasman, where these vistas would become dominated by industrial mining activity. We recommend an amendment to the condition around bunds to help address this.⁵⁵

Mitigating Conditions

107. CRRG submits that the consent, if granted, should include conditions requiring the applicant to mitigate effects of the mine on neighbouring rural residential properties:

- a. by providing double glazing to those properties within 100m of the mine, the relocated WCP and the mine haulage route along the 25km section of the Coast Road;
- b. by the re-naturalisation of the area post mining with public access in the form of combined cycleway/walkways. This would also form partial compensation for the adverse social effects from the presence of a long-term industrial activity in a rural residential area;
- c. by requiring the applicant to purchase affected properties at market value if owners wish to sell and are unable to.⁵⁶

N. COMMUNITY LIAISON GROUP AND COMMUNITY AGREEMENT

108. If the Panel sees fit to approve the application, we submit, given the scale and duration of the proposed mine and its adjacency to the Coast Road community, that

⁵³ Substantive application, Environmental context, 5,45

⁵⁴ Ibid

⁵⁵ Appendix 6 CRRG amendments to the applicant’s proposed conditions.

⁵⁶ ibid

the Panel include a condition requiring a Community Liaison Group (CLG) and a Community Agreement. See Appendix 6: CRRG amendments to the applicant's proposed conditions.

109. CLG and community agreement conditions would seek to ensure that the concerns of the community are fully understood by the applicant and appropriate measures to address these concerns are undertaken. We expect that this would help give the Panel confidence that long-term relationships between the project and the affected community can be managed in a structured and durable way.

O. BONDS AND LIABILITY FINANCING

110. The \$300,000 bond proffered by the applicant is short by orders of magnitude for a mine of this scale and timeframe involving sites containing radioactive waste and should be at least \$3,000,000.
111. The bond should be set to address ordinary failure scenarios (such as the possibility of discharge of radioactive material into groundwater) rather than covering only the mine void rehabilitation. CRRG submits that without a higher bond these costs would be imposed on the West Coast community, in which case the clean-up costs need to be accounted for as part of the economic impact assessment as a cost the proposal imposes on the regional economy.
112. We submit that should the Panel consider granting this application, the bond should also guarantee compliance with the rest of the consent conditions post-mine closure, including the CRRG proposal that land post-mining is re-naturalised.⁵⁷

P. CHARACTER OF THE APPLICANT

113. A "good character" assessment may not be a formal evaluation criterion under the Fast Track Approvals Act, but CRRG understands that under the Act the applicant should set out their financial viability and why they can be trusted.

⁵⁷ Refer to Appendix 6: CRRG amendments to the applicant's proposed conditions.

Historical background

114. In 2021, when the applicant was known as Barrytown JV Ltd, the company submitted an application which was deemed incomplete. The applicant was given a 'second shot' through a hearing adjournment, but still the application was incomplete and therefore declined. This drawn-out process came at a high cost to the community, particularly to near neighbours who were the only ones deemed 'affected' by the limited notification.

115. In 2023, now known as TiGa, the applicant presented a proposal for a 50-year industry with long-lasting benefit to the Coast. The narrative was soon changed to a short-term project, dubbed by the applicant as 'bespoke' and a 'boutique operation' where they would be 'in and out' within twelve years. Consent was granted in 2024.

116. Now, the cumulative effect of this 2026 Fast-track application and the nearby existing consents would result in an operation nearing 50 years, to be extended even further if the already-listed Northern Block project is granted using the Fast-track process.

117. It would have been helpful to the community if these long-term plans had been acknowledged throughout our period of engagement with the applicant.

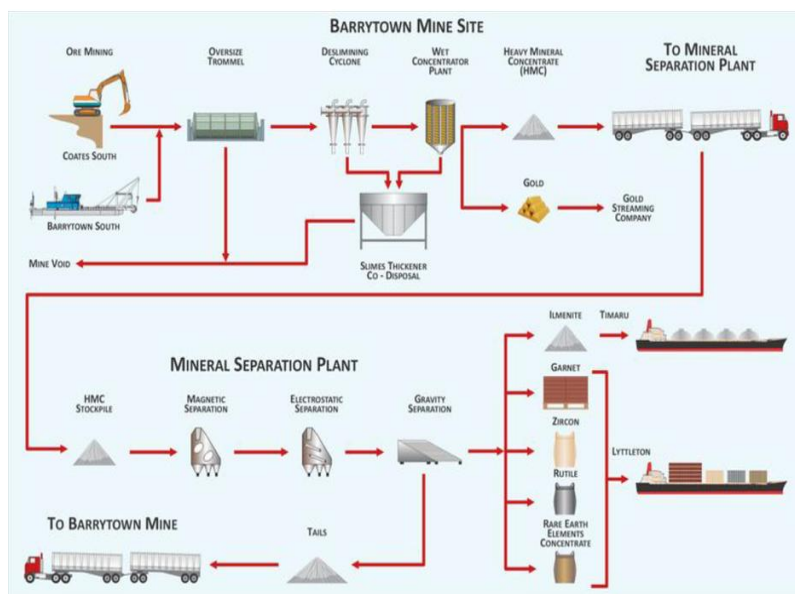
Constant changes to company name

118. The frequent changes of the company name and branding, from Barrytown Joint Venture Ltd (2015) to TiGa Minerals and Metals Limited (2023), to Tāiko Critical Minerals Ltd in 2025 has created difficulties in keeping track of the company and its projects, for all parties, over the six years of their proposals for the Barrytown Flats. CRRG considers this demonstrates lack of transparency.

Further uncertainty around applicant plans

119. At the 30 June 2026 meeting between CRRG working group members and TCM Project Manager Mike Meehan and CEO Robert Brand, we asked about the applicant's intention to separate and export rare earth element concentrates [REE] as

displayed in a flow chart [below] on the TCM website, the NZX listing profile and Mr Brand's media statements about TCM's *'mine to market strategy ... establishing New Zealand's first critical minerals and rare earth elements production facility'*⁵⁸. Mr Meehan stated they were *"not set up to produce rare earth elements"*. This contradiction creates uncertainty over the applicant's intentions. On 30 June 2026 the TCM personnel assured us they would change the flow chart to remove the item showing REE headed for Port Lyttleton. As of 28 Sept 2026 no change has been made.



Flow chart accessed from TCM website 28 Sept 2026. Rare earth element concentrate shown headed for Port Lyttleton bottom right.

Non-disclosure

120. Mr Brand has not disclosed in this application his involvement as CEO for the Australian Mt Hart mine. In September 2016, Mr Brand made economic and employment forecasts for Mt Hart comparable to those now made for Barrytown and the region. Three years later the Mt Hart mine went into administration with 50 jobs lost.^{59 60 61 62}

⁵⁸ Grey Star 25 October 2026

⁵⁹ Mr Brand's 2016 projections for the [Mt Hart garnet mine](#)

⁶⁰ 2019 ABC News: ["Harts Range garnet mine goes into administration leaving nearly 50 workers without a job"](#)

⁶¹ <https://www.abc.net.au/news/rural/2016-09-30/harts-range-garnet-mine-goes-into-production-in-the-red-centre/7887932>

⁶² <https://www.abc.net.au/news/rural/2019-12-05/harts-range-garnet-mine-australian-abrasive-minerals-shuts/11764474>

Social Licence

121. The applicant speaks of being “*committed to a partnership with Ngāti Waewae and the community ...*” - 2.11 Substantive Application. CRRG commends the applicant’s consultation of Te Rūnanga o Ngāti Waewae, but the application does not contain evidence of partnership with the community. A single meeting of the community liaison group does not suffice.

Q. CONCLUDING REMARKS

122. CRRG submits the incompleteness of the application in respects detailed in our comments, in our legal submission and expert reports means the panel cannot make a safe decision.

123. CRRG submits that the project’s adverse impacts and risks to the environment, the community, and the region’s reputation, comprehensively outweigh possible economic regional benefits and the application should be declined.

124. Without prejudice to our position that consent should be declined, should the panel see fit to grant consent for this application, CRRG has made recommendations on amendments to the consent conditions offered by the applicant in Appendix-P1-Resource-Consent-Conditions-District-and-Regional-Council.pdf. These amendments are attached as ‘CRRG amendments to the applicant’s proposed conditions’.

125. Given the short time frame, these amendments should not be considered exhaustive, and some are not fully phrased but are present as placeholders.

Ngā mihi nui



Katherine Crick

Chair, Coast Road Resilience Group Inc.

