



Comments on project under the Fast Track Approvals Act 2024

Barrytown Minerals Project, FTAA-2605-1238

Contact Details	
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Introduction

1. Tāiko Critical Minerals Limited (Applicant) has lodged an application for the Barrytown Minerals Project (project) under the Fast-track Approvals Act 2024 (the FTA Act).
2. There are no listed heritage places located within the project area.
3. The Applicant has applied for an archaeological authority as part of the substantive application.
4. In accordance with section 53(2)(k) of the FTA Act, Heritage New Zealand Pouhere Taonga (HNZPT) has been invited to comment on the substantive application as the administering agency for the Heritage New Zealand Pouhere Taonga Act 2014.

Comments on Application

Archaeological Authority

5. HNZPT has provided comment in relation to the archaeological authority in its s51 Report dated 14 September 2026.
6. In summary, HNZPT has recommended that the archaeological authority be granted subject to recommended conditions; and that Bree Wooller is approved as the person to undertake the archaeological work under this authority.
7. HNZPT provided a revised set of conditions that have been agreed with the Applicant for the archaeological authority, appendix A of the s51 Report.

Resource Consent Conditions

8. HNZPT has reviewed the draft resource consent conditions proposed by the Applicant include in *Appendix P1 – Resource Consent Conditions- District and Regional Council of the Substantive Application*.
9. In respect of the draft conditions, HNZPT comments as follows:



Proposed condition number	Discussion	Change requested (additions <u>underlined</u> , deletions ~~strikethrough~~)
18.1	HNZPT opposes the condition as drafted. This condition sets out an Accidental Discovery Protocol (ADP) to be followed if there is a discovery of material suspected to be taonga, kōiwi or an archaeological site. An ADP is only appropriate when it would be a genuine accident if archaeological material was encountered. Here, due to the potential for encountering archaeological material, the applicant has applied for an archaeological authority that covers the mining disturbance area. Thus, the discovery of any archaeological sites including taonga and kōiwi within the boundary of the authority are anticipated and are managed through the agreed archaeological authority condition set included in Appendix A of HNZPT's s.51 report and the processes set out in the archaeological management plan. Condition 18.1 should therefore be amended to apply <u>only</u> to the area not subject to the archaeological authority.	Edit as follows: <u>In the areas not subject to an archaeological authority, the following accidental discovery process applies:</u> Immediately following the discovery of material suspected to be a taonga, kōiwi or archaeological site the following steps shall be taken: a. All works on the site will cease immediately at that place and within 20m around the site. b. Immediate steps will be taken to secure the site to ensure the archaeological material is not further disturbed. c. The contractor/works supervisor/owner will notify the Rūnanga, Council and the Area Archaeologist of Heritage New Zealand. In the case of kōiwi (human remains), the New Zealand Police must be notified. d. The Rūnanga and Heritage New Zealand will jointly appoint/advise a qualified archaeologist who will confirm the nature of the accidentally discovered material. e. The contractor/works supervisor/owner will also consult the Rūnanga on any matters of tikanga (protocol) that are required in relation to the discovery and prior to the commencement of any investigation. f. If kōiwi (human remains) are uncovered, in addition to the steps above, the area must be treated with utmost discretion and respect, and the kōiwi dealt with according to both law and tikanga, as guided by the Rūnanga. Remains are not to be moved until such time as Rūnanga, NZ Police and Heritage New Zealand have responded. g. Works in the site shall not recommence until authorised by the Rūnanga, Heritage New Zealand (and the NZ Police in the case of kōiwi). h. All parties will work towards work recommencing in the shortest possible timeframe while ensuring that any archaeological sites discovered are protected until as much information as practicable is gained and a decision regarding their appropriate management is made, including obtaining an archaeological authority under the Heritage New Zealand Pouhere Taonga Act 2014 if necessary. Appropriate management may include recording or removal of archaeological material. i. Although bound to uphold the requirements of the Protected Objects Act 1975, the contractor/works supervisor/owner recognises the relationship between Ngāi Tahu whānui, including its Rūnanga, and any taonga (Māori artefacts) that may be discovered. Where Rūnanga so request, any information recorded as a result of the find such as a description of location and content, is to be provided for their records.



Conclusion

10. The applicant has applied for an archaeological authority that covers the mining disturbance area. The archaeological authority conditions have been designed to mitigate the effects of the proposed works on any archaeological sites within that area.
11. HNZPT considers condition 18.1 of the draft Resource Consent conditions should be edited to make clear that this condition only applies to the area outside of the archaeological authority boundary.