

Appendix AA Assessment of Application against the Ngāti Mahuta Environmental Management Plan

Appendix AA: Assessment of the Taharoa Central and Southern Block FTAA mining application against the Ngāti Mahuta ki te Hauaauru Environmental Management Plan

This assessment should be read in conjunction with the Consultation Summary in Appendix Z.

Relevant section - NMEMP	Comment
<p>Kia Mahuta Ake</p> <p>Mahere Whaanui – Plan Wide</p> <p>This section of the plan sets out the over-arching provisions that apply across all domains addressed in the plan. The over-arching provisions set out NMKTH expectations and aspirations in the Taharoa rohe. The key provisions of relevance to the TIL application are as follows:</p> <p><i>Mana Whakahaere</i></p> <ul style="list-style-type: none"> • MA-O1. Mana whakahaere, particularly in relation to decision-making, representation, leadership, monitoring, and data sovereignty is held with NMKTH. • MA-O2. NMKTH are resourced to and engage and participate in the highest level of decision-making on matters that affect the rohe. • MA-O3. Taonga species and indicators are researched, identified/developed, monitored, protected, and enhanced, consistent with the tikanga, kawa, and maatauranga, to give effect to the exercise of mana whakahaere of NMKTH. • MA-P1. Ensure NMKTH actively participates in all relevant resource management and decision-making processes to ensure resource use, activities, and development within the rohe enhances the taiao. This includes participation in policy and plan development, notified resource consent applications, and recommending conditions of consent. 	<p>NMKTH have participated and continue to actively participate in consenting processes applicable to the Mine. In recognition of the mana whenua status of NMKTH, the three marae and Te Runanga ki te Hauaauru are included in the proposed conditions of consent as parties who must be consulted during the preparation of final management plans for addressing adverse effects of the mining activity.</p> <p>The specialist environmental assessments undertaken for the TIL application have addressed potential adverse effects on several taonga species (e.g. grey mullet, pekapeka/long tailed bats, matuku herapo/Australasian bittern) and have proposed measures to avoid or minimise effects on those taonga species. Several taonga species will be the subject of ongoing monitoring, the results of which can be shared with NMKTH to enhance knowledge of these species.</p> <p>While for reasons of operational health and safety the continuation of the mining activity on the Central/Southern Blocks restricts access to that part of the whenua (and has done so since the early 1970's), NMKTH still retain the ability to undertake traditional customary activities and customary recreational activities e.g by utilising the CMA. Access to Te Kooraha Marae is maintained by TIL through the Mine site and across the Mitiwai Stream.</p> <p>In an overall sense, the assessment in this table demonstrates that the Project application is generally consistent with the NMEMP. While there is inconsistency with some provisions which is identified, it is noted that in resource management</p>

Relevant section - NMEMP	Comment
<ul style="list-style-type: none"> MA-P2. Recognise and provide for NMKTH as mana whenua and kaitiaki and the ongoing relationship with the taiao to ensure the relationship with the taiao and other taonga is protected and provided for. MA-P3. Ensure that taonga species are protected, restored, and managed, consistent with the tikanga, kawa, maatauranga, and mana whakahaere of NMKTH. <p><i>Resource Use and Activities</i></p> <ul style="list-style-type: none"> MA-O4. Resource management planning, resource use, activities, and development within the NMKTH rohe are consistent with this Plan. MA-O5. NMKTH are able to undertake traditional customary activities, customary recreational activities, commercial activities, and have access to whenua. MA-O6. NMKTH areas of interest are managed in an integrated way, considering the cumulative effects of all activities. MA-P5. Ensure that an integrated, holistic, and coordinated approach to resource management planning, resource use, activities, and development is achieved and sustained. MA-P7. Ensure that NMKTH are able to undertake traditional customary activities, customary recreational activities and have access to whenua. MA-P8. Ensure that resource management planning, resource use, activities, and development within the NMKTH rohe are consistent with this Plan. <p><i>Monitoring, Capacity and Capability</i></p> <ul style="list-style-type: none"> MA-O7. NMKTH have mana whakahaere over monitoring, reporting, databases, and information management and/or accurate monitoring, reporting, databases, and information management are accessible to NMKTH. MA-P9. Ensure that NMKTH are engaged and involved early in the development of resource management policy and plan(s) and activities. 	<p>practice consistency with a plan does not mean that an activity needs to be consistent with every provision.</p> <p>In addition to including representatives from the Maraes and Te Runanga as parties to be consulted during the preparation of final management plans required by the conditions of consent, TIL proposes a condition of consent requiring various reports and environmental monitoring results to be made available on a website. This will ensure NMTKH representatives will be able to access the reports and environmental monitoring information.</p> <p>While NMTKH do not at this point have a formal cultural monitoring role, as required by proposed conditions of consent, iwi parties will have a role in developing the EMP and fish pass monitoring. Many members of NMTKH are also beneficiaries in the Mine, as shareholders of Taharoa C.</p> <p>Comprehensive environmental assessments have been prepared, and potential cumulative effects have been considered to ensure an integrated and holistic approach is taken with respect to development of the mine site. The proposal takes account of environmentally sensitive areas such as the streams, lakes and CMA, and taonga species. Integrated management is supported through proposed consent conditions that require consultation with NMKTH representatives in on-going processes including the development of environmental management plans.</p>

Relevant section - NMEMP	Comment
<ul style="list-style-type: none"> MA-P10. Build capacity through development of a representative/s to engage in consent applications and monitoring, plan development processes, and seek resourcing to support ongoing operation. MA-P11. Ensure legible mapping is provided to NMKTH in relation to resource management planning and processes. MA-P12. Through the resource consent process, ensure the appointment of NMKTH cultural monitors, and secure monitoring rights and access for NMKTH for development proposals with the potential to create adverse effects. MA-P13. Encourage collaborative research and monitoring projects between NMKTH, using both maatauranga Māori, or traditional knowledge, and other science and knowledge systems. MA-P14. For whaanau to be self-sufficient, adequately resourced, and capable to carry out their responsibilities as kaitiaki in the protection and monitoring of domains and the transmission of maatauranga. 	
<p>Maatauranga – Traditional Knowledge</p> <ul style="list-style-type: none"> IO-O1. Enhance maatauranga around the concept of lo and atua. IO-O2. The spiritual connection between taangata and atua is maintained. IO-O3. NMKTH maramataka is developed and utilised in all resource management and decision-making processes. IO-O4. NMKTH have strong traditional knowledge around environmental management and taonga species. IO-P1. Develop educational resources around the concept of lo and atua. IO-P2. Provide for and perform regular karakia tawhito ceremonies and rituals. 	<p>TIL has proposed resource consent conditions and archaeological authority conditions that provide for tangata whenua to exercise kaitiakitanga and for maatauranga Māori to be incorporated into the site's management of environmental effects. This provides the opportunity for NMKTH maatauranga and maramataka to be incorporated. This includes:</p> <ul style="list-style-type: none"> A requirement that the Conceptual Site Closure Plan includes measures to protect existing Māori reserves and ensure access for customary cultural practices is not prevented in the long term; That the Environmental Management Plan (EMP) must incorporate matauranga Māori and cultural health indicators; and That in the event that koiwi or archaeological remains are discovered, a local kaumatua must be contacted within 12 hours of discovery and provided an

Relevant section - NMEMP	Comment
<ul style="list-style-type: none"> • IO-P4. Ensure NMKTH maramataka is developed and utilised in all resource management and decision-making processes. • IO-P5. Support NMKTH to create resources and educate whaanau on NMKTH-specific maramataka and traditional koorero. • IO-P6. Support NMKTH as kaitiaki of the narratives of their people. • IO-P7. Support NMKTH to research and educate whaanau on maatauranga of taonga species. 	opportunity to undertake karakia or other cultural activity as appropriate in accordance with an Archaeological Management Plan.
Matariki, Ranginui, Taawhirimaatea, Te Ararangi, Ngaa Moorearea Ao Tuuroa, Whakaputa Hiko – Air, Climate, Natural Hazards, Renewable Energy	
<p>Discharges to Air</p> <p><i>Issues:</i></p> <ul style="list-style-type: none"> • MR-I2. Discharges to air from development and land-use activities are adversely impacting on the health and wellbeing of people, the environment, hauanga kai, and cultural activities. Discharges to air can cause dust nuisance, reduced visibility, odour problems, and potentially impact on human health. Impacts on human health can be specific to an individual and linked to their overall holistic health profile. • MR-I3. Air pollution can cause a reduction in visibility and impede views of maunga, landmarks, moana, awa, etc. <p><i>Objective:</i></p> <ul style="list-style-type: none"> • MR-O3. The quality and amenity of discharge to air is such that the life supporting capacity and quality of air within the rohe is retained at a level that does not compromise human health, amenity values, or property. <p><i>Policies:</i></p> <ul style="list-style-type: none"> • MR-P5. Ensure that the quality of any discharge to air is retained at a level such that it does not compromise human health, amenity values, or property. • MR-P6. Discourage development proposals generating excessive air pollution. 	<p>In terms of air discharges, the Mine operates under Permitted Activity Rule 6.1.16.1 in the Waikato Regional Plan (“WRP”). That rule allows for discharges to air from mineral extraction activities, subject to compliance with (amongst other things) the permitted and controlled activity standards in Rule 6.1.8 of the WRP as follows:</p> <p>a) There shall be no discharge of contaminants beyond the boundary of the subject property that has adverse effects on human health, or the health of flora and fauna.</p> <p>b) The discharge shall not result in odour that is objectionable to the extent that it causes an adverse effect at or beyond the boundary of the subject property.</p> <p>c) There shall be no discharge of particulate matter that is objectionable to the extent that it causes an adverse effect at or beyond the boundary of the subject property.</p> <p>d) The discharge shall not significantly impair visibility beyond the boundary of the subject property.</p> <p>e) The discharge shall not cause accelerated corrosion or accelerated deterioration to structures beyond the boundary of the subject property.</p> <p>To allow for mining activity on the Central/Southern Block to be able to comply with</p>

Relevant section - NMEMP	Comment
	<p>Rule 6.1.16.1, a range of mitigation measures to address the potential for dust emissions from the site are set out in a Dust Management Plan, which has been and will continue to be the subject of regular review.</p> <p>One of these measures is the use of real time monitoring equipment to record Total Particulate Matter (“TPM”) discharges at strategic locations such as Te Kooraha Marae and dwellings on selected sites adjoining the Mine. There are several TPM monitors in use at the site at present.</p> <p>While at times there will be dust emissions from the site given its exposed coastal location, the Air Quality Assessment prepared by PDP Ltd concludes that the mitigation and control measures employed at the site will manage dust emissions to a point where offensive or objectionable effects are not experienced at the nearby receptors. The PDP report also concludes that it is extremely unlikely that direct health effects can be associated with the type of dust generated by the mining activity given the larger particle sizes of the material involved.</p> <p>It is also noted that TIL is proposing to more heavily focus on mining below the water table which is likely to reduce dust effects.</p>
<p>Maramataka</p> <p><i>Issue:</i></p> <ul style="list-style-type: none"> • MR-I4. There is underutilisation of maatauranga Māori and maramataka, specific to NMKTH, as to how adverse effects can be appropriately managed or mitigated. <p><i>Objective:</i></p> <ul style="list-style-type: none"> • MR-O5. There is consistent transmission of knowledge around astrology, maramataka, and Matariki that is NMKTH specific. <p><i>Policy:</i></p> <ul style="list-style-type: none"> • MR-P7. Make full use of the knowledge of NMKTH with regards to native birds, plants and other traditional materials, and its value in understanding how to protect the taiao and manage effects of resource use, activities, and development. 	<p>The preparation of the final environmental management plans for the site will be undertaken in consultation with (amongst others) NMTKH Marae and Te Runanga representatives. This will allow for NMKTH knowledge to have an influence on the final management plans.</p>

Relevant section - NMEMP	Comment
<p>Migratory Pathways</p> <p><i>Issue:</i></p> <ul style="list-style-type: none"> • MR-I5. Development and land-use activities are adversely impacting migratory pathways. <p><i>Objectives:</i></p> <ul style="list-style-type: none"> • MR-O6. Tikanga, kawa and karakia pertaining to migratory pathways and patterns are respected and undertaken. • MR-O7. Migratory pathways are protected and enhanced. <p><i>Policies:</i></p> <ul style="list-style-type: none"> • MR-P8. Avoid, remedy, or mitigate adverse effects on migratory pathways. 	<p>These provisions are most relevant to potential effects on taonga fish species that use the Wainui Stream, long tailed bat (pekapeka) movements around the site, and marine mammals that traverse the coastal waters around Taharoa.</p> <p>Grey mullet are a taonga fisheries species to Ngāti Mahuta present in Lake Taharoa. The dam in the Wainui Stream presents a barrier to the upstream and downstream migration of grey mullet (and other species such as tuna) from the ocean to the lake. This potential adverse effect is avoided through the presence and ongoing operation of a fish pass that allows for grey mullet and other freshwater species to move upstream pass the dam. A minimum flow downstream of the dam will also be observed to ensure downstream fish movements can occur.</p> <p>Pekapeka have been identified as traversing the exotic forest areas on the site, and the vegetated corridors adjacent to perennial waterbodies such as the Mitiwai Stream. While the exotic forestry on the site will be harvested in the future, the vegetated waterway corridors will be protected and enhanced.</p> <p>The coastal waters in the area between Manukau Heads and New Plymouth are known to be habitat for the critically endangered Māui dolphin. Cawthron Institute have assessed the potential direct and indirect effects for marine mammals (including Māui dolphin) of the offshore activities carried out by TIL as less than minor to nil.</p>
<p>Papatuaanuku, Ruuaumoko</p> <p>Whenua, Keri Oopapa – Land Use, Mining, Minerals</p> <p>Areas and Sites of Significance</p> <p><i>Issues:</i></p> <ul style="list-style-type: none"> • PR-I3. NMKTH are concerned at the ways that waahi tapu and waahi tuupuna, whether owned by NMKTH or privately owned, have sometimes been managed in the past. This has led to the destruction or inappropriate use of waahi tapu and waahi tuupuna sites. Often NMKTH are not 	<p>The current accidental discovery protocol in place at the Mine addresses the discovery of koiwi, waahi tapu and taonga. This will be replaced by a similar protocol outlined in an Archaeological Management Plan. The Management Plan has had input from Taharoa C and reflects the tikanga of Ngāti Mahuta. Taharoa C have indicated that the Management Plan : <u>....“will ensure that the significant cultural values associated with the Taharoa C Block are recognised and</u></p>

Relevant section - NMEMP	Comment
<p>informed of such impending use or destruction. For a number of reasons NMKTH may not wish to reveal the location or type of a waahi tapu or waahi tuupuna. However, unless NMKTH are involved in managing waahi tapu and waahi tuupuna, such 'hidden' sites cannot be appropriately managed.</p> <ul style="list-style-type: none"> PR-I4. Past development has isolated NMKTH communities from waahi tapu, sites of significance, and sites of customary activity. NMKTH will measure the success of future development on how well it restores and protects these connections, relationships, and activities. PR-I5. There are a number of areas and sites of significance to NMKTH that can be impacted from resource use, activities, and development. These include but are not limited to sites on public and private lands, and coastal sites or dunes. Waahi tapu and sites of significance may be intentionally or accidentally altered or destroyed. <p><i>Objectives:</i></p> <ul style="list-style-type: none"> PR-O8. NMKTH manages and/or owns all identified waahi tapu and waahi tuupuna. PR-O9. Landmarks, areas, and sites of significance to NMKTH are accurately mapped and named. PR-O10. Taonga and waahi tapu are actively respected, protected and maintained from the impacts of resource use, activities, and development. PR-O11. The adverse effects of resource use, activities and development are managed so as to appropriately protect areas and sites of significance, as determined by NMKTH. PR-O12. Procedures are in place to manage the discovery of taonga and archaeological sites, as determined by NMKTH. <p><i>Policies:</i></p> <ul style="list-style-type: none"> PR-P13. NMKTH marae are actively engaged to ensure the appropriate management, identification, and mapping of waahi tapu, waahi tuupuna, archaeological sites and taonga, including information storage. 	<p><u><i>provided for and the adverse effects of ongoing mining excavation activity on those values are mitigated and appropriately managed."</i></u></p> <p>Several areas including urupā and waahi tapu within the Project site have historically, and will continue to be reserved from mining activity. Therefore, any sites of significance to Ngāti Mahuta are considered to be appropriately protected from continued mining operations.</p>

Relevant section - NMEMP	Comment
<ul style="list-style-type: none"> PR-P14. Actively engage with and notify NMKTH on resource use within the rohe with potential to affect waahi tapu, waahi tuupuna, archaeological sites and taonga to ensure that the adverse effects of resource use, activities and development are appropriately managed. PR-P15. Ensure that sufficient general provisions for NMKTH involvement in waahi tapu and waahi tuupuna management are in place and understood. PR-P16. Avoid, remedy, or mitigate adverse effects on waahi tapu, waahi tuupuna, archaeological sites and taonga, as determined by NMKTH. PR-P17. Support and encourage initiatives in the rohe that seek to establish areas or reserves for the protection of taonga. 	
<p>Mining</p> <p><i>Issue:</i></p> <ul style="list-style-type: none"> PR-I7. Mining and the effects of mining have contributed to the pollution and deterioration of the health of the taiao. Mining activity is often relatively long life, and mine operators have an ongoing part to play in mitigating the effects of their operations. It is not sufficient to wait until consents expire. There needs to be an ongoing effort to investigate ways to minimise the adverse effects of mining. <p><i>Objective:</i></p> <ul style="list-style-type: none"> PR-O14. In partnership with NMKTH, existing and new mining activities effectively manage adverse social, cultural, spiritual, environmental effects, as determined by NMKTH. <p><i>Policy:</i></p> <ul style="list-style-type: none"> PR-P19. In partnership with NMKTI, ensure that existing and new mining activities effectively manage adverse social, cultural, spiritual, environmental, and economic effects, including effectively remediating and restoring mining sites, as determined by NMKTH. 	<p>The Mine has existed as land use at Taharoa since 1972, and 35 year consents are sought to continue its long term operation.</p> <p>TIL is continually investigating ways to mitigate the environmental effects of the ongoing mining activity – it is required to do so to comply with its consents, to adapt to constraints such as weather, and because of its obligations to the landowner. This includes adopting best practice in terms of efficient water use and in recent years TIL has invested in water re-use and recycling processes to reduce water use at the Mine. TIL has also researched and is implementing innovative measures for sand dune stabilisation and rehabilitation through the use of coconut matting.</p> <p>The positive social and economic effects of the operation of the Mine are extremely significant. The potential adverse environmental effects of the Mine can be managed to low levels.</p> <p>In considering cultural effects, it is important to note the cultural benefits the ongoing operation of the Mine has for Ngāti Mahuta as tangata whenua. These benefits include employment benefits, royalties, and support for the local community. Ngāti Mahuta, though Taharoa C, own the land on which the Mine operates and is paid significant royalties from the Mine. The Mine also supports the employment and growth of Ngāti Mahuta whanau. The local employment opportunity generated by the Mine has allowed the local community to retain</p>

Relevant section - NMEMP	Comment
	<p>members of the community who may have otherwise moved away to seek employment elsewhere and lost their connection to the land.</p> <p>TIL understands the views of the respective Marae and Te Runanga in relation to the potential cultural effects of the Central and Southern Block Project. In summary, at a high-level:</p> <ul style="list-style-type: none"> i. The damming of the Wainui Stream has the potential to have adverse effects on the health of Lake Tahaaroa and its indigenous fishery (including the indicator species of kanae/grey mullet), an important matter to Ngāti Mahuta. The maintenance of the effectiveness of the fish pass at the dam in the Wainui Stream is important to ensure that the presence of indicator and taonga indigenous fish species in the stream and lake upstream of the dam continues. ii. The maintenance and monitoring of baseflow in the Mitiwai Stream is also an important matter from a cultural perspective. TIL has engaged expert consultants to monitor the stream to ensure that TIL understands the potential effects of its mining activity on the Stream, which will be managed through consent conditions. Sediment/ water clarity, water quality, flow characteristics and temperature (i.e. indicators as set out in the NMKTH plan) have all been incorporated into routine monitoring conditions for the Mitiwai Stream. iii. Rehabilitation of the Mine site to a sustainable landform and land cover is also an important matter to Ngāti Mahuta. Representatives of Ngāti Mahuta have shared their desire for the land to be returned to its natural state following mining activity (being rolling sand dunes with some pockets/corridors of vegetation particularly adjacent to streams and the lakes). TIL's proposed resource consent conditions provide for effective rehabilitation and site closure by requiring progressive interim and final rehabilitation to be undertaken in accordance with a Site Rehabilitation Plan, consistent with its existing consents. In that regard, TIL is proposing to develop an overall Site Rehabilitation Plan and Conceptual Site Closure Plan

Relevant section - NMEMP	Comment
	<p>that is consistent with this vision to be implemented when the Mine closes in the future. Both of these plans can be developed to include indicator plant species as set out in the NMKTH plan.</p> <p>iv. TIL proposes to consult with the respective Marae and Te Runanga in the preparation of the various management plans that govern the management of effects at the Mine. Such consultation and engagement benefits both parties – TIL will gain the benefit of access to the skills and expertise that reside within the marae and hapu whanau, while marae and hapu whanau will have the opportunity to influence the content of management plans that will play an important part in managing the ongoing effects of the mining activity. TIL will also propose the provision of a website which includes monitoring records to communicate data to mana whenua and the community.</p>
<p>Tangaroa</p> <p>Te Taiao Moana, Mahinga Ika – Coastal Environment, Fisheries</p> <p>Resource Use and Activities</p> <p><i>Issue:</i></p> <ul style="list-style-type: none"> • TA-I1. The coastal marine area has been impacted by extractive industries, commercial fisheries, motor vehicle use, and other activities and discharges leading to coastal erosion, reduced water quality, increased waste, habitat loss and depletion of kai moana. This has, in turn, led to a lack of access and ability for NMKTH to undertake customary and traditional practices including the gathering of kai. <p><i>Objectives:</i></p> <ul style="list-style-type: none"> • TA-O1. Coastal marine area habitats, ecosystems and waahi tapu are protected and enhanced. • TA-O2. The mauri of marine waters in the NMKTH coastal area is protected and enhanced and the marine biodiversity in the NMKTH coastal area is restored and protected. • TA-O3. Coastal erosion is effectively managed, as determined by NMKTH, so that the NMKTH coastal area is protected and enhanced. 	<p>All of the extraction and processing of the iron sand resource occurs on land. The potential adverse effects of the offshore infrastructure and activities associated with the Mine (export pipelines, Single Buoy Mooring, and ship loading discharges) have been assessed by experts in terms of marine mammals, marine ecology, and coastal processes (including sediment transfer) to be negligible/less than minor.</p> <p>The significant foredune complex along the western (seaward) edge of the Taharoa C Block is protected from mining activity by way of a 100 m mining setback from Mean High Water Springs. The foredune plays an important part in coastal erosion protection.</p> <p>It is anticipated that NMKTH can continue to undertake customary coastal and recreational activities (for example hauanga kai, swimming, fishing) as these activities will not be adversely affected by the offshore components of the Mine activity.</p>

Relevant section - NMEMP	Comment
<ul style="list-style-type: none"> • TA-04. Activities in the NMKTH coastal area only occur when adverse effects to the environment, community, and customary activities are managed, as determined in consultation and engagement with NMKTH. • TA-05. NMKTH have the ability to undertake customary coastal activities to sustain manuwirhi and whaanau with traditional coastal food sources. • TA-06. NMKTH have the ability to undertake customary recreational activities and have access to whenua NMKTH have the capability to undertake commercial activities. • TA-07. NMKTH engage and participate in the highest level of decision-making on matters that affect the coastal marine area in the NMKTH rohe. <p><i>Policies:</i></p> <ul style="list-style-type: none"> • TA-P1. Ensure that the mauri of marine waters in the NMKTH coastal area is protected and enhanced and that the marine biodiversity in the NMKTH coastal area is restored and protected. • TA-P3. Ensure a precautionary approach to resource use, activities and development in the coastal area that may result in adverse effects to the environment, community, and customary activities. • TA-P4. Active participation in resource management decision-making processes within the rohe that include discharges to the coastal marine area to ensure consistency with tikanga. • TA-P6. Ensure that NMKTH marae are able to undertake customary coastal activities and have the ability to sustain manuwirhi with traditional coastal food sources during hui, poukai, and waananga. • TA-P7. Ensure NMKTH have the ability to undertake customary recreational activities and have access to whenua. 	<p>The sediment plume associated with ship loading is comprised of naturally occurring materials. The mauri of the coastal waters affected by the plume is maintained because the receiving environment is not sensitive to such discharge, and has a significant capacity to dilute and disperse the discharge within a relatively small area.</p>
<p>Water Quality</p> <p><i>Issues:</i></p> <ul style="list-style-type: none"> • TA-I2. NMKTH are concerned with land use practices and the impact on coastal water quality. The contamination of coastal waters has led to the closure of many traditional gathering areas due to health concerns. There is concern at the discharge of waste into the coastal environment, 	<p>There are two discharges to coastal waters associated with the Mine activity. The first is the ship loading discharge that is comprised of freshwater and ironsand. Both are naturally occurring substances within the marine environment at this location. The second is the periodic discharge of clean stormwater through the export pipelines when on-site stormwater retention devices are at or nearing full capacity (e.g. at times of heavy rainfall). The short term and periodic nature of</p>

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<p>including discharge from offshore activities and vessels. Degrading water quality impacts on NMKTH</p> <ul style="list-style-type: none"> • hauanga kai such as the ability to gather kai moana (seafood) for whaanau, marae, and hapuu. • Integrated management is required to manage the effects of human activity or to enable human activity to continue in a sustainable way. As kaitiaki, NMKTH has a responsibility to ensure that integrated management occurs. <p><i>Objective:</i></p> <ul style="list-style-type: none"> • TA-O8. Water quality is such that coastal waters within the rohe of NMKTH are swimmable and fishable in all places. <p><i>Policies:</i></p> <ul style="list-style-type: none"> • TA-P10. No direct or indirect discharges of contaminants to the coastal marine area. • TA-P11. Minimise sediment runoff into the coastal marine area. 	<p>these discharges does not alter the enduring quality of the coastal waters in terms of ability to swim and/or fish in them.</p> <p>Sediment is controlled on the Mine site through sediment retention ponds and devices to avoid discharges to the coastal marine area.</p>
<p>Dunes</p> <p><i>Issue</i></p> <ul style="list-style-type: none"> • TA-I3. The integrity of sand dunes is important for the effective functioning of coastal ecosystems. Dunes provide habitat for flora and fauna and the ineffective care or management of dune systems can result in major erosion and loss of habitat. Dune vegetation, which stabilises the dune systems, can be damaged or destroyed from inappropriate vehicle movements and other inappropriate public use along the coastal sand dune areas. <p><i>Objective</i></p> <ul style="list-style-type: none"> • TA-O9. Sand dunes and dune systems are protected and enhanced. <p><i>Policy</i></p> <ul style="list-style-type: none"> • TA-P16. Avoid or minimise inappropriate vehicle movements and other inappropriate public use, as determined with NMKTH, along the coastal sand dune areas. 	<p>The coastal foredune adjacent to and within the Taharoa C Block is protected from mining activity by a 100 m setback from Mean High Water Springs. Accordingly, mining related vehicle movements within the foredune environment are also avoided.</p>

Relevant section - NMEMP	Comment
<p>Maru Te Wai Māori, Ngaa Repo – Freshwater, Wetlands</p> <p>General Management</p> <p><i>Issue</i></p> <ul style="list-style-type: none"> MA-I1. Resource use, activities, and development, particularly mining and activities below the water table, are causing significant impacts on NMKTH including loss of biodiversity and the ability of NMKTH to utilise hauanga kai. MA-I2. The mauri of NMKTH wetlands is linked to the overall ecological health and well-being of our whakapapa (i.e., to the native fauna and flora found in those systems). These are the resources that NMKTH rely on for a number of cultural practices. Negative impacts on the whakapapa of the wetland have corresponding negative effects on wetland mauri and the ability of NMKTH to utilise hauanga kai. <p><i>Objectives</i></p> <ul style="list-style-type: none"> MA-O1. Estuarine habitats and ecosystems are protected and enhanced. MA-O2. Existing wetlands are protected and enhanced. MA-O5. An integrated and holistic approach to management of water is achieved. MA-O6. NMKTH have the ability to undertake hauanga kai activities within the rohe. <p><i>Policies</i></p> <ul style="list-style-type: none"> MA-P1. To encourage improvements to local hydrology (where possible) to support healthy wetland function, and restoration of locally appropriate wetland biodiversity within local planning and land management practice. MA-P2. Through the resource consent process, ensure the appointment of NMKTH cultural monitors, and secure monitoring rights and access for NMKTH for development proposals with the potential to create adverse effects on inland waters. MA-P4. Resourcing of additional officials and/or NMKTH whaanau to monitor resource use, activities, and development with the potential to create adverse effects on waterways. 	<p>TIL is seeking to remove some moderate/low value wetlands on the Southern Block that have predominantly been induced by past mining activity. These wetlands are not accessible for hauanga kai purposes.</p> <p>Some of the mining activity on the Central and Southern Block will interact with the water table, particularly within the Central Block adjacent to the Mitiwai Stream. However, the underlying hydrology of the site and immediate area will not be altered by mining activity such that the healthy function of the wetlands adjoining the lake system will be impaired. Planting of areas adjacent to wetlands that will be retained on the site, along with margins along/around other perennial waterbodies, will contribute to restoration of biodiversity.</p> <p>NMKTH will be consulted during the preparation of the final Management Plans to address effects and the indicator species and practices of NMKTH can be incorporated into monitoring. The EMP must incorporate matauranga Māori and cultural health indicators.</p> <p>Monitoring and environmental reporting information will be made available to NMKTH through a website to be maintained by TIL.</p>

Relevant section - NMEMP	Comment
<ul style="list-style-type: none"> MA-P5. Develop an information database accessible to NMKTH whaanau of all perennial, ephemeral and receiving inland waters within the rohe to assist NMKTH in decision making regarding future development activities. Information collected or sourced which includes mapping and riparian buffer zones, current environmental conditions, information all consents for discharges to inland waters within the rohe. MA-P6. Ensure that there is an integrated and holistic approach to catchment management that is effective and informative, as determined by NMKTH, and the scope of planning is broad. 	
<p>Discharges and Runoff</p> <p><i>Issues</i></p> <ul style="list-style-type: none"> MA-I3. Point source discharges (e.g., sewage, wastewater, stormwater) are issues that impact mauri, mahinga kai, and biodiversity, as well as the ability of whaanau to safely interact with these locations. MA-I4. The quality of water determines the relationship that NMKTH has with its waters. Environmental degradation and excessive water take, at a national level, has occurred at a large cost and the physical, chemical, and biological quality of water has deteriorated as a result of both point source pollution (discharges into a body of water at a specific location), and non-point source pollution (contamination from diffuse sources). NMKTH are concerned of the lack of integrated management of waters to support economic gains, and the impacts of this and previous poor management practices are increasingly being seen. MA-I5. Diffuse discharges such as sediments and stormwater entering the environment are known to carry contaminants (e.g., heavy metals, hydrocarbons, and pesticides) that degrade fisheries and aquatic values and may accumulate in the environment and up the food chain. This could impact human health and customary practices. The increase in water contamination has led to the deterioration of the mauri of water. The degradation of the whenua and waterways affects the use (physical and metaphysical) of water resources, hauanga kai, and water's life supporting capacity. It is recognised that there are two significant issues related to 	<p>There are no point source discharges to inland waters associated with the mining activity. A diffuse stormwater discharge occurs to the Wainui Stream from the central stores and administration area at times of heavy rainfall, and incidental discharges to land of slurry water occur from the likes of leaking pipes and valves. Neither of these discharges create any adverse effect given their irregularity and short term nature.</p> <p>Soakage based stormwater retention devices are used extensively throughout the Central/Southern Block.</p> <p>Lake Tahaaroa, the Mitiwai Stream and most of the length of the Wainui Stream (apart from the area adjacent to the water intakes for health and safety reasons) remain swimmable and fishable.</p> <p>Water quality to a level that meets drinking water standards, presumably without treatment, is likely an unachievable goal for either Lake Tahaaroa, the Wainui Stream or the Mitiwai Stream due to background bacterial levels from land use in the wider catchment and other sources. However, elevated bacterial levels to an unacceptable level for drinking water, would not necessarily limit hauanga kai activity.</p> <p>Erosion and sediment control procedures/devices are followed and installed during activity on the site, as are geotechnical engineering recommendations to ensure safe and stable landforms particularly adjacent to waterways.</p>

Relevant section - NMEMP	Comment
<p>water: water quality and water quantity (allocation). These have significant impacts on the relationship between NMKTH and water.</p> <ul style="list-style-type: none"> MA-I6. Water quality issues such as excessive nutrients, toxic algal blooms and eutrophication, impact kaimoana, their habitats and the ability of whaanau to interact safely with these locations. <p><i>Objectives</i></p> <ul style="list-style-type: none"> MA-07. The mauri of all water bodies within the rohe is protected and enhanced. MA-08. The waters are drinkable, swimmable, and fishable. <p><i>Policies</i></p> <ul style="list-style-type: none"> MA-P7. No unacceptable direct point discharges to perennial, ephemeral and inland waters. MA-P8. Unacceptable non-point discharges to perennial, ephemeral and inland waters are avoided and efficiently monitored. MA-P9. Ensure NMKTH monitor and participate in the re-consenting cycle for active resource consents permitting discharges to inland waters. MA-P12. Promote the adoption of alternative stormwater management practices that align with tikanga Māori. MA-P13. For development proposals with the potential to create adverse effects on waterways, promote effective sediment and stormwater management practices during construction and post-construction. MA-P15. Ensure NMKTH actively participates in all resource consent applications within the rohe that include discharges to inland waters or that include activities proposed within a riparian buffer zone. MA-P16. Promote the establishment of riparian planting and fencing within buffer zones by educating landowners and establishing nurseries for supply of locally sourced plants. 	<p>NMKTH participated in the 2020-24 reconsenting and hearing process under the RMA and are active participants in the current process under the FTAA.</p>
<p>Pest Management</p> <p><i>Issue</i></p> <ul style="list-style-type: none"> MA-I7. NMKTH are concerned about poor management of pest species. The quality of water and its role in the natural biodiversity of waterways 	<p>Pest and weed control/biosecurity procedures are implemented at the site, including those associated with the operation of the Port of Tahaaroa as a Point of First Entry to New Zealand.</p>

Relevant section - NMEMP	Comment
<p>has been greatly altered as a result of transporting and holding pest fish and plant species.</p> <p><i>Objective</i></p> <ul style="list-style-type: none"> MA-O9. Pest species are appropriately managed, as determined by NMKTH. <p><i>Policy</i></p> <ul style="list-style-type: none"> MA-P17. Ensure that priority plant and animal pests are appropriately identified, managed, and/or controlled to a level where their effects are minor or, where possible, are eradicated. 	<p>Pest control is proposed as a condition of consent which has the objective to undertake pest flora and fauna eradication and control for the purposes of ecological enhancement.</p>
<p>Tuumatauenga</p> <p>Te Koerero Tahi –Engagement and Consultation</p> <p>Decision Making and Relationship Management</p> <p><i>Issues</i></p> <ul style="list-style-type: none"> TU-I5. Central and local government resource management policies and objectives, and the activities of users in the rohe at times conflict with NMKTH customary activities and uses. NMKTH seeks to ensure productive relationships between all those who impact on or use the resources within the rohe. <p><i>Objectives</i></p> <ul style="list-style-type: none"> TU-O3. A broad awareness and respect for NMKTH values, kawa and tikanga is developed. TU-O4. Developments occurring within the rohe respect whakapapa and NMKTH kawa and tikanga. TU-O5. Productive relationships exist between NMKTH and those whose activities impact on the use of our resources within the NMKTH area. <p><i>Policies</i></p> <ul style="list-style-type: none"> TU-P8. Resource users and activity operators collaborate with NMKTH and undertake consultation and engagement consistent with this Plan, including providing the resources so that NMKTH's involvement is cost recovered. 	<p>NMKTH tikanga and kawa are respected by TIL, particularly given the connection Ngāti Mahuta has with the Mine site.</p> <p>During consultation, Te Kooraha requested formal hui every 8 to 12 months which includes updates on the implementation of consent conditions, open reporting on environmental and cultural impacts. A condition has been included in the consent which includes:</p> <ul style="list-style-type: none"> A requirement for TIL to invite listed stakeholders (including TLT) to <u>annual</u> meetings regarding resource management matters relating to the operation of the mine. TIL will provide a venue and prepare an agenda. A requirement to retain a consultation register. A requirement to make the consultation register available to Waikato Regional Council, and to provide them with annual consultation updates. <p>The ability for NMKTH to be involved in the creation of a fish pass monitoring programme is also specifically provided for in proposed conditions.</p> <p>A number of indicators and taonga species set out in the NMKTH IMP have already been assessed and are incorporated into the management plans and ongoing environmental monitoring that will occur as set out in the proposed conditions of consent.</p>

Relevant section - NMEMP	Comment
<p>Tiki, Hineahuone Ngaa Taangata – Socio-Economic</p> <p>Self-Sufficiency</p> <p><i>Issues</i></p> <ul style="list-style-type: none"> TH-I1. NMKTH are concerned with their ability to return back to the whenua and live sustainably. Several reasons include lack of supply in mahi/employment and housing. This in turn leads to more whaanau not regularly returning back to the whenua as kaitiaki and disconnection, particularly with rangatahi. NMKTH seeks to move towards sustainable land uses and independence in various industries. <p><i>Objectives</i></p> <ul style="list-style-type: none"> TH-O1. NMKTH have the capacity and capability to return to their whenua with sustainable opportunities for employment and education. <p><i>Policy</i></p> <ul style="list-style-type: none"> TH-P1. Build the capacity and capability of NMKTH to return back to their whenua in employment, education and papakainga opportunities. 	<p>The ongoing operation of the Mine provides significant local and regional benefit. Since TIL acquired the Mine in 2017 more than \$150 million in royalties and dividends have been paid to the Taharoa C Incorporation (comprised entirely of Ngāti Mahuta tribal members). Wages and payments to local and regional contractors are regionally significant.</p> <p>A large proportion of Mine workers are Ngāti Mahuta iwi. The Mine is the major employer in the NMKTH rohe and provides significant local employment opportunity for those whanau who wish to stay in Tahaaroa or return to their whenua. This includes employment in Kāwhia for activities relating to operation of the port and ship loading.</p>
<p>Community Benefit</p> <p><i>Issues</i></p> <ul style="list-style-type: none"> TH-I4. The costs of resource use, activities, and development within the rohe are impacting NMKTH including customary ways of life being forever disrupted. Therefore, NMKTH seeks to ensure local benefit from local activities. <p><i>Objective</i></p> <ul style="list-style-type: none"> TH-O1. NMKTH have the capacity and capability to return to their whenua with sustainable opportunities for employment and education. <p><i>Policy</i></p> <ul style="list-style-type: none"> TH-P10. Ensure that resource use, activities, and development within the rohe demonstrate a direct community benefit for the communities near their activities. 	<p>TIL owns and maintains 75 houses in Taharoa Village – this is the vast majority of houses in the village. Almost all of the village residents derive their income from the Mine. Every family in the village has a member working at the Mine as an employee or contractor. A number of residents in the Village are also service providers to the Mine e.g. they are contractors to the Mine, drive the local bus (which TIL funds), or undertake maintenance on village infrastructure and housing (which is owned and funded by TIL).</p> <p>Other significant benefits to the local community include:</p> <ul style="list-style-type: none"> (a) The provision of critical infrastructure including the village water and wastewater and other services including the community hall and two sports facilities a; (b) Subsidised freight services for the village store; (c) Access to the Mine's petrol and diesel supplies for the local community; and (d) Education payment for travel and boarding for employee's high-school aged children.