

6 Proposed Condition and Changes to Conditions

6.1 Condition 1, Schedule 2

Under Section 127, it is proposed to change the wording in Condition 1, Schedule 2 of the resource consent documentation for resource consents 100899, 100900, 100901, 100902, 100903, 100904, 100905, 100906, 100908, 100909, 100910, and 111002. Condition 1(i) is quoted in full below with proposed amendments shown as underlined (for additions).

1(i) The activity shall be carried out in general accordance with the application for this resource consent and the document titled "New Zealand Steel – Assessment of Environmental Effects, Taharoa Ironsand Mine, July 2002", except where otherwise identified in subsequent conditions of this consent, and the document "New Zealand Steel – Taharoa Ironsand Mine Assessment of Environmental Effects – Addendum, December 2012". Where there are differences, the 2012 document shall prevail.

6.2 Condition 1, Schedule 1

Under Section 127, it is proposed to change the wording in Condition 1, Schedule 1 of the resource consent documentation for resource consents 122562, 122563, 122564, 122565, 122566, 122567, and 122568. Condition 1(i) is quoted in full below with proposed amendments shown as underlined (for additions).

1(i) The activity shall be carried out in general accordance with the application for this resource consent and the Tonkin and Taylor Ltd document titled "New Zealand Steel – Taharoa Mooring Relocation and Pipeline Extension and Replacement and Assessment of Effects on the Environment, March 2011" (including 17 March 2011 amendment), except where otherwise identified in subsequent conditions of this consent, and the document "New Zealand Steel – Taharoa Ironsand Mine Assessment of Environmental Effects – Addendum, December 2012". Where there are differences, the 2012 document shall prevail.

6.3 Condition 3, Consent 100906

Under Section 127, it is proposed to change the wording of Condition 3 of Consent 100906, to allow the continuation of mining operations during shiploading activities. Condition 3 is quoted in full below with proposed amendments shown as underlined (for additions).

3. This consent shall not be exercised during the exercise of consent 100905, except that any water not used for shiploading may be used for the purpose of iron sand mining operations up to a maximum of 75,000m³ per day.

6.4 Proposed Conditions for Groundwater Permit

The following conditions are proposed for the groundwater permit.

Activity Authorised: To divert groundwater and mine tailings water from an ironsand mining operation.

- 1. The exercise of this consent shall be undertaken in general accordance with the application for this resource consent and any documentation supporting the application, unless identified in the resource consent conditions below.**

- 2. The Waikato Regional Council may within the January to June six month period following three years from the date of commencement of this consent and every three years after, serve notice on the consent holder under Section 128 (1) of the Resource Management Act 1991, of its intention to review the conditions of this groundwater resource consent for the following purposes:**
 - (i) To review the effectiveness of the conditions of this resource consent in avoiding or mitigating any adverse effects on the environment from the exercise of this resource consent and if necessary to avoid, remedy or mitigate such effects by way of further or amended conditions; or**
 - (ii) If necessary and appropriate, to require the holder of this resource consent to adopt the best practicable option to remove or reduce adverse effects on the surrounding environment due to the groundwater take and diversion or**
 - (iii) To review the adequacy of and the necessity for monitoring undertaken by the consent holder in light of previous monitoring and/or changes in site operations; and**
 - (iv) To take account of any changes to the Waikato Regional Council Plans or Policies.**

Such review shall be commenced only after consultation between the Waikato Regional Council and the consent holder.

Note 1: Actual and reasonable costs associated with any review of the conditions of this resource consent will be recovered from the consent holder in accordance with the provisions of Section 36 of the Resource Management Act 1991.

- 3. The consent holder shall pay to the Waikato Regional Council any administrative charge fixed in accordance with Section 36 of the Resource Management Act 1991, or any charge prescribed in accordance with regulations made under Section 360 of the Resource Management Act 1991.**

7 Conclusion

This Assessment of Environmental Effects has been prepared as part of an application for resource consent under Section 88 of the RMA and a variation of consent under Section 127.

Overall the proposal requires consent as a **Discretionary Activity** under the Waikato Regional Plan.

Based on the assessment above, it is concluded that any potential effects are unlikely to be significant, and can be managed in accordance with the existing consents requirements and management practices on site.

The proposal has also been assessed against the relevant objectives, policies and assessment criteria in the Waikato Regional Plan and is considered to be consistent with these.



Appendix A

Summary of Resource Consents

Appendix A – Summary of Resource Consents for the Taharoa Minesite

Resource Consent	Permit Number	Year of Issue	Type	Activity
Coastal permit	122566 (replaces 100899)	2011	Discharge to water	Discharge up to 75,000m ³ per day of ship loading water, including freshwater and fine sediment to water in the Coastal Marina Area at Taharoa during ship loading operations.
Coastal permit	122567 (replaces 100900)	2011	Discharge to water	Discharge up to 32,600m ³ per day of stormwater and process wastewater to water in the Coastal Marine Area at Taharoa.
Coastal permit	100901	2006	Bed - disturbance	Operate, maintain and replace existing mooring in the Coastal Marine Area for the purpose of ship loading
Land use	100902	2006	Land disturbance	Undertake iron sand mining operations and associated land disturbance activities including construction of dredge ponds, access roads, iron sand stockpiles and ancillary buildings.
Water permit	100903	2006	Dam	To dam and divert the Wainui Stream for the purpose of creating a water supply reservoir for iron sand mining operations
Water permit	100904	2006	Diversion	Place a rock weir in the bed of the Wainui Stream and to divert water through a fish pass channel located adjacent to the Wainui Stream
Water permit	100905	2006	Surface water take	Take up to 27,200m ³ of water per day from a water supply reservoir created by the damming of the Wainui Stream, for the purpose of iron sand mining operations.
Water permit	100906	2006	Surface water take	Take up to 75,000m ³ of water per day from a water supply reservoir created by the damming of the Wainui Stream, for the purpose of loading iron sand onto ships.
Discharge permit	100908	2006	Discharge to water	Discharge up to 2,100m ³ of settled stormwater and washdown water per day into the Wainui Stream from the area containing the administration building, stores compound and workshops.
Discharge permit	100909	2006	Discharge to land	To discharge process water into the ground as a result of iron sand mining operations.
Discharge permit	100910	2006	Discharge to water	To discharge mine overburden onto land for the purpose of rehabilitating mined areas.
Coastal permit	111002	2006	Bed – disturbance	Operate, maintain and replace existing pipeline in the Coastal Marine Area for the purpose of ship loading

Resource Consent	Permit Number	Year of Issue	Type	Activity
Land use consent	122568	2011	Land – disturbance	To undertake soil disturbance in a high risk erosion area associated with the replacement of an existing pipeline (No 2) at Taharoa
Coastal permit	122562	2011	Structure, use and occupation	To construct, maintain and use a 500m extension to pipeline No 2 in the CMA at Taharoa, including associated occupation and disturbance.
Coastal permit	122563	2011	Structure, use and occupation	To replace/construct, maintain and use existing pipeline No 2 in the CMA at Taharoa, including associated occupation, disturbance and vehicle use.
Coastal permit	122564	2011	Structure, use and occupation	To place and use a mooring buoy and associated structure in the CMA at Taharoa, including future reconstruction/replacement and associated occupation and disturbance.
Coastal permit	122565	2011	Use and occupation	The use and occupation of the CMA at Taharoa by existing pipeline No 1.

Appendix B

Statutory Planning Assessment

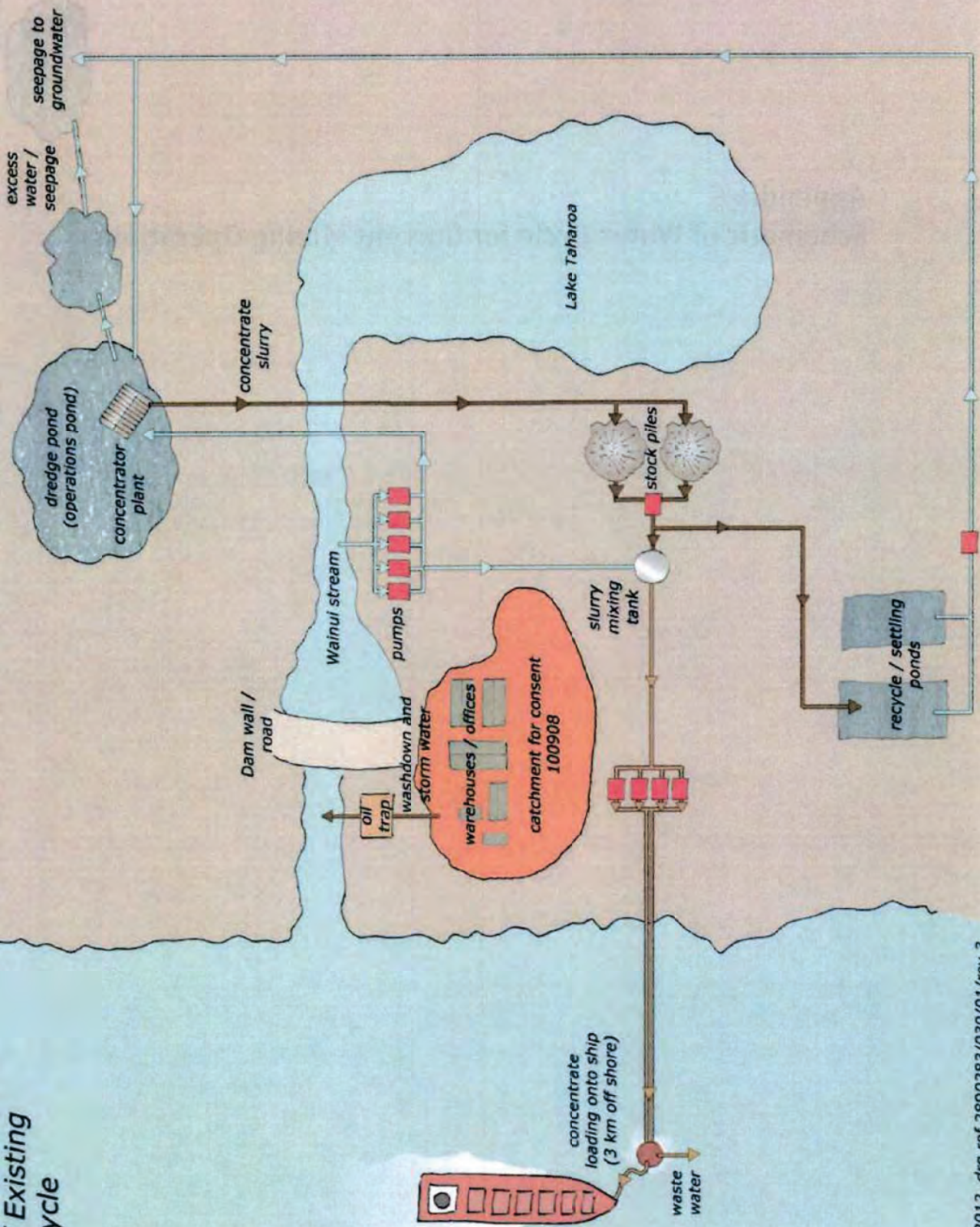
Appendix B – Statutory Planning Assessment

Proposed Activity and Resultant Change in Effects	Existing Resource Consent	Resource Management Act 1991	Waikato Regional Plan	Waikato Regional Coastal Plan
Divert and take groundwater associated with the new tailings storage area.	No existing consent - New application for resource consent to take groundwater required.	The taking/diversion of groundwater requires a resource consent under s14(3)(a), as the take is not expressly allowed by a rule in a regional plan or proposed regional plan.	The proposed groundwater take is considered a discretionary activity under Section 3.3.3 Policy 10(g)(i) and Rule 3.3.4.24(4).	NA
Discharge of iron sand slurry water into the Coastal Marine Area during ship loading operations up to the consented limit of 75,000m ³ per day. No change in the consented envelope of effects will occur as a result of the proposed change of conditions.	Coastal discharge permit 122566 (replaced discharge permit 100899)	The activity is covered under s15(1) of the RMA as it is authorised by an existing resource consent.	NA	NA
Discharge stormwater and process wastewater up to the consented maximum of 32,600m ³ per day into the Coastal Marine Area. No change in the consented envelope of effects will occur as a result of the proposed change of conditions.	Coastal discharge permit 122567 (replaced discharge permit 100900).	The activity is covered under s15(1) of the RMA as it is authorised by an existing resource consent.	NA	NA
The proposed augmentation of the wet mining operations with dry mining operations is an activity that remains classified under the broad description of "iron sand mining operations and associated land disturbance activities". Mining will remain within the consented parameters of the consent conditions, including the extent and coverage of the mining operations. No change in the consented envelope of effects will occur as a result of the proposed change of conditions.	Land Disturbance Permit 100902.	The activity is covered under s9 of the RMA as it is authorised by an existing resource consent.	NA	NA
The proposed activity will recycle and reuse existing operational water. Water take from the Wainui stream for operational purposes will remain within the consented limit of 27,200m ³ per day. No change in the consented envelope of effects will occur as a result of the proposed change of conditions.	Water Take Permit 100905	The activity is covered under s14 of the RMA as it is authorised by an existing resource consent.	NA	NA
The proposed activity will recycle and reuse existing operational water. Water takes from the Wainui stream for ship loading will remain within the consented limit of 27,200m ³ per day. No change in the consented envelope of effects will occur as a result of the proposed change of conditions.	Water Take Permit 100906	The activity is covered under s14 of the RMA as it is authorised by an existing resource consent.	NA	NA
The proposed activity will not discharge more than 2,100m ³ per day of settled stormwater and washdown water into the Wainui stream, and all stormwater from the workshops and administration compound will continue to pass through an oil trap.	Discharge to Water Permit 100908	The activity is covered under s15(1)(a) of the RMA as it is authorised by an existing resource consent.	NA	NA

Proposed Activity and Resultant Change in Effects	Existing Resource Consent	Resource Management Act 1991	Waikato Regional Plan	Waikato Regional Coastal Plan
No change in the consented envelope of effects will occur as a result of the proposed change of conditions.				
The proposed activity will continue to discharge process water into the ground as a result of iron sand mining operations. All process water will be directed into either settling ponds or soakage areas, which will be maintained in accordance with the conditions of the consent. No change in the consented envelope of effects will occur as a result of the proposed change of conditions.	Discharge to Land Permit 100909	The activity is covered under s15(1)(a) of the RMA as it is authorised by an existing resource consent.	NA	NA
The proposed activity will continue to place a large amount of overburden onto land (over 5,000m ³) for temporary stockpiling until mined areas are ready to be rehabilitated. No change in the consented envelope of effects will occur as a result of the proposed change of conditions.	Discharge to land permit 100910	S15(1) states that no person may discharge any contaminants onto or into land in circumstances which may result in that contaminant entering water; unless the discharge is expressly allowed by a rule in a regional plan and proposed regional plan, a resource consent or by regulations.	NA	NA

Appendix C
Schematic of Water Cycle for Current Mining Operations

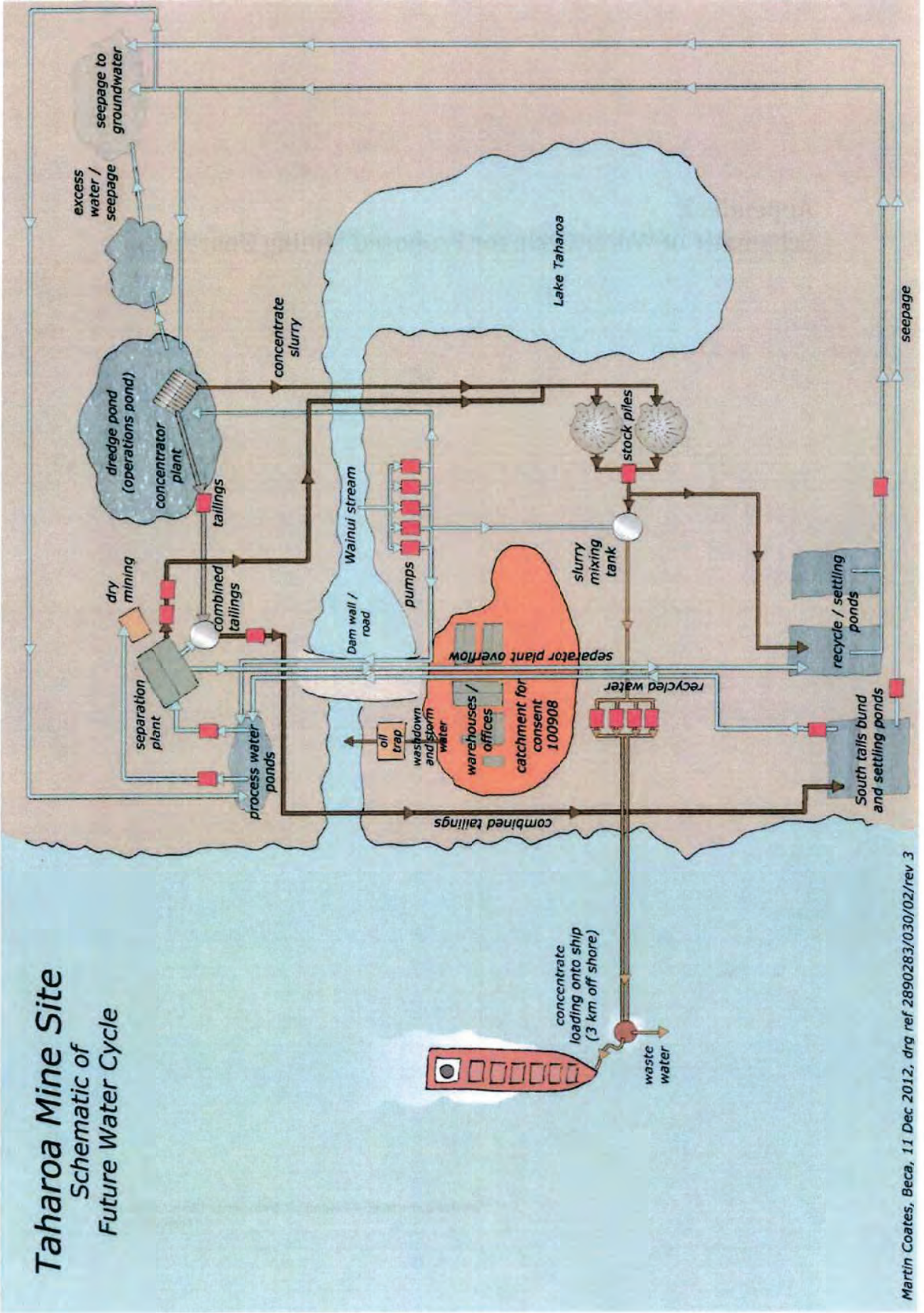
Taharoa Mine Site Schematic of Existing Water Cycle



Appendix D
Preliminary Layout of Proposed Mining Operations

Appendix E
Schematic of Water Cycle for Proposed Mining Operations

Taharoa Mine Site Schematic of Future Water Cycle



Appendix F
Public Consultation Presentation Material and List of
Attendees



**NEW ZEALAND
STEEL**

TAHAROA PROJECT STAGE 2



December 2012

Rev 3



Introduction

Dougal Francis

Mining Manager

Murray Lye

Project Director

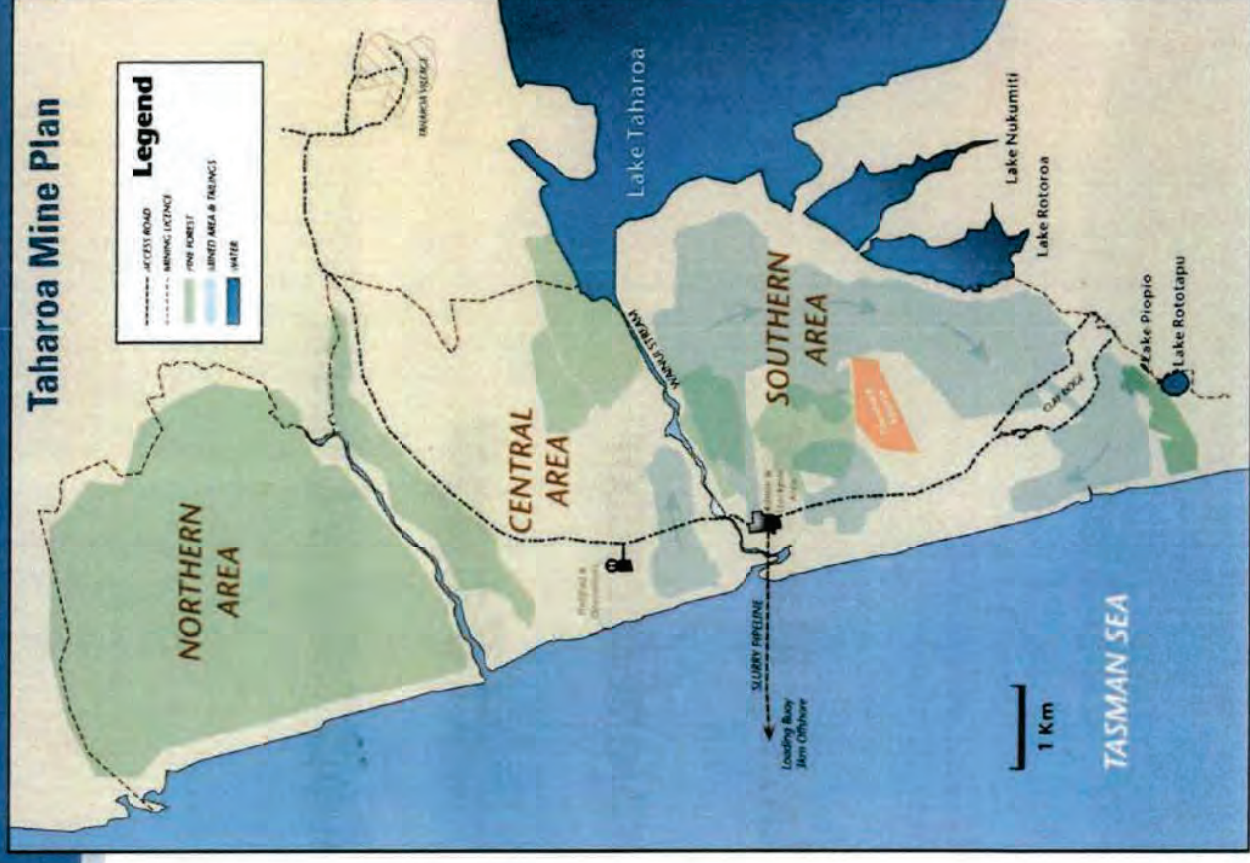
Theo Annandale

Project Manager

Plus members of the Project team and Taharoa Minesite

Background – Taharoa Mine

- Mining commenced at Taharoa in 1972.
- NZ Steel holds a lease from Taharoa C Block Incorporated to mine iron sand deposits.
- Area of approximately 1300 hectares. Area is divided into three main zones; the Northern, Central and Southern.
- Focus now in the **Central zone**, north of the Wainui stream.
- Changes to **mining technique** to address different sand formations.
- **Stage 1** successfully completed to extend ship loading pipes.



What is the Stage 2 Project?

- **Increasing iron sand volume and improving efficiency in water management**
- **Flexibility** of mining methods
- Maintaining good environmental performance
 - **Water recycling**
 - **Water recovery**
- Managing environmental effects to stay **within consented limits** and parameters

Taharoa



Wet mining pond - concentrator plant and suction unit, connected via the flexible hose, at Taharoa.

The Wainui stream, which supplies freshwater to the mine operations.



Taharoa



Dozer Trap working at Taharoa circa 1977.

Aerial photo of concentrate stockpiles and mine site.



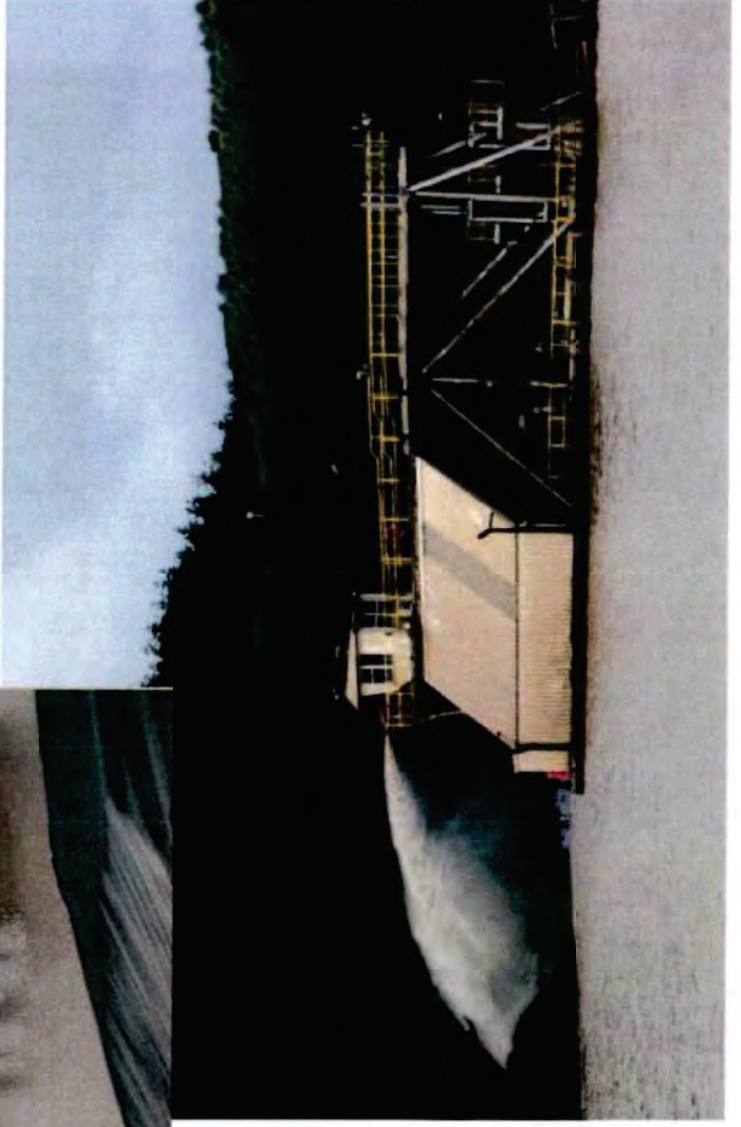
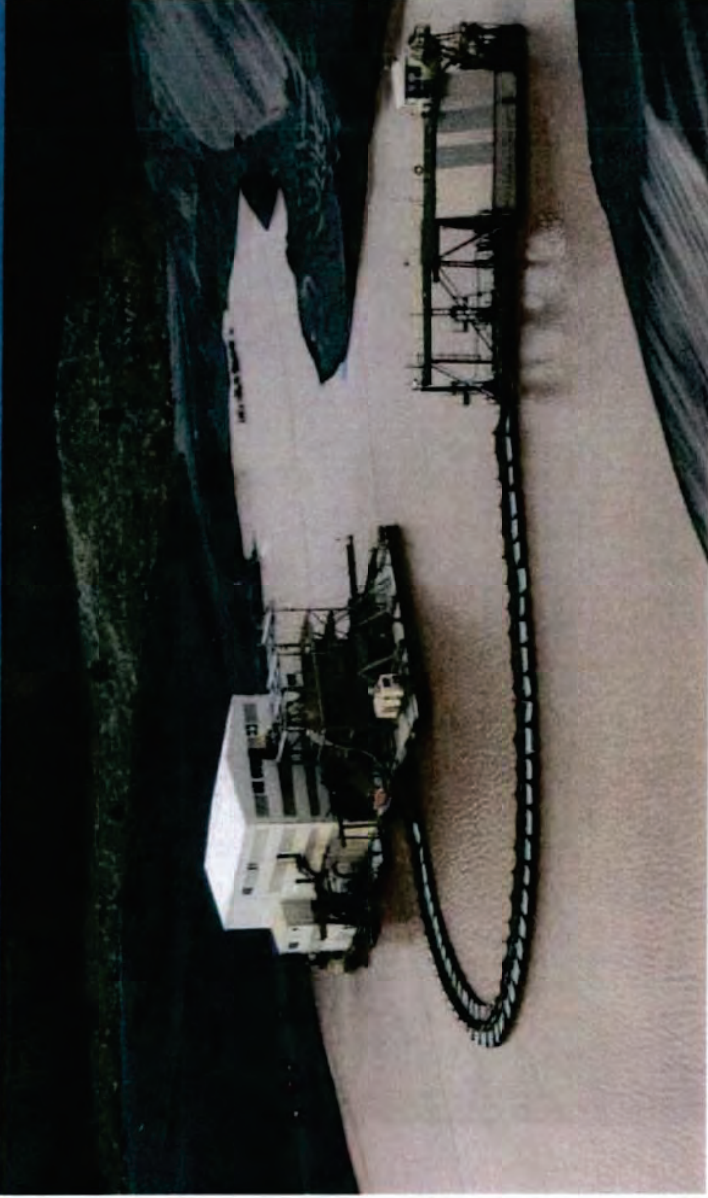
Council process

- NZ Steel currently holds **12 resource consents** granted in 2006 by Waikato Regional Council that authorise ironsand extraction operations.
- It is proposed to seek a change to those consents to provide for the increased ironsand concentrate extraction volumes.
- A supplementary report is being prepared to support the application.

Project Programme

- **December/January** – lodge application and Council processing time
- **From March 2013** – progressive implementation of additional dry mining and new spiral separation plants (modular plant and multiple buried feeders)
- **October 2013** – 2nd ship commences trade

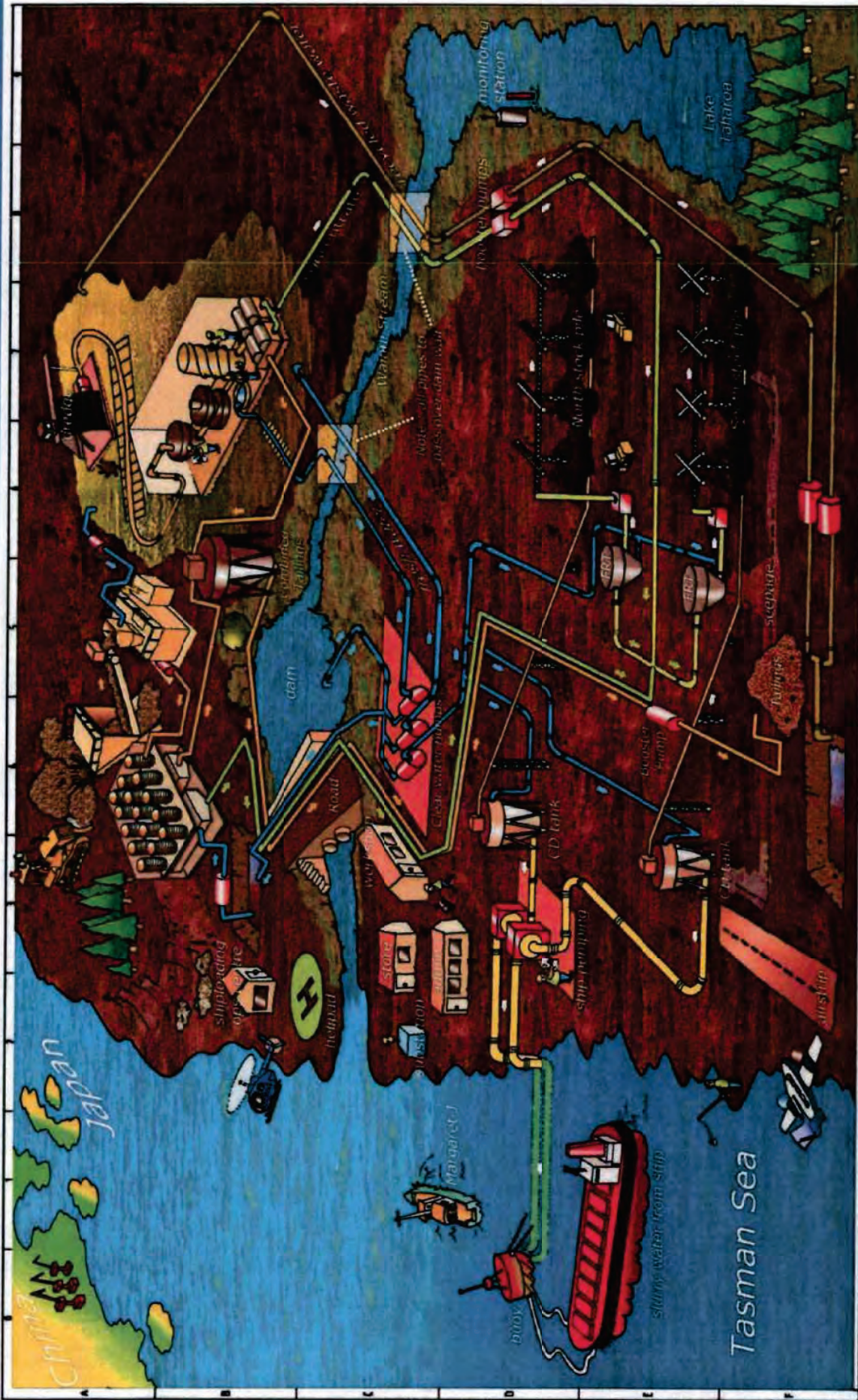
Current Mining Process



Current Mining Process

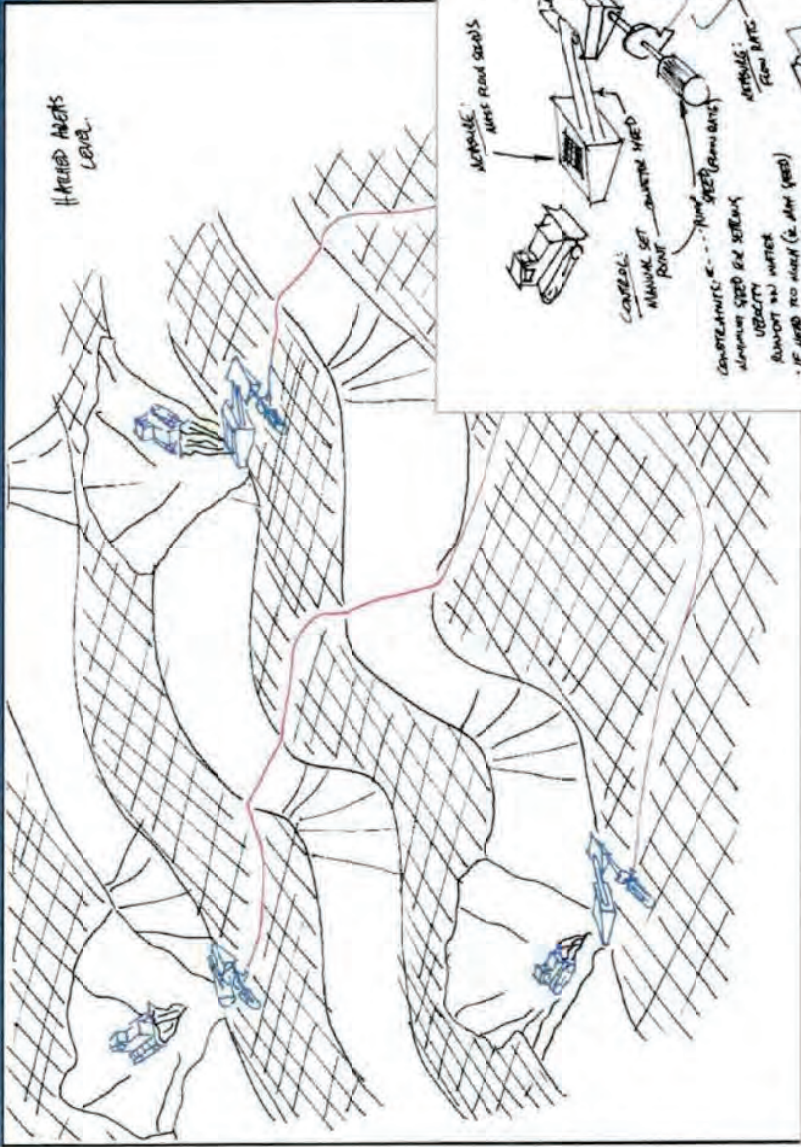


Proposed changed operations

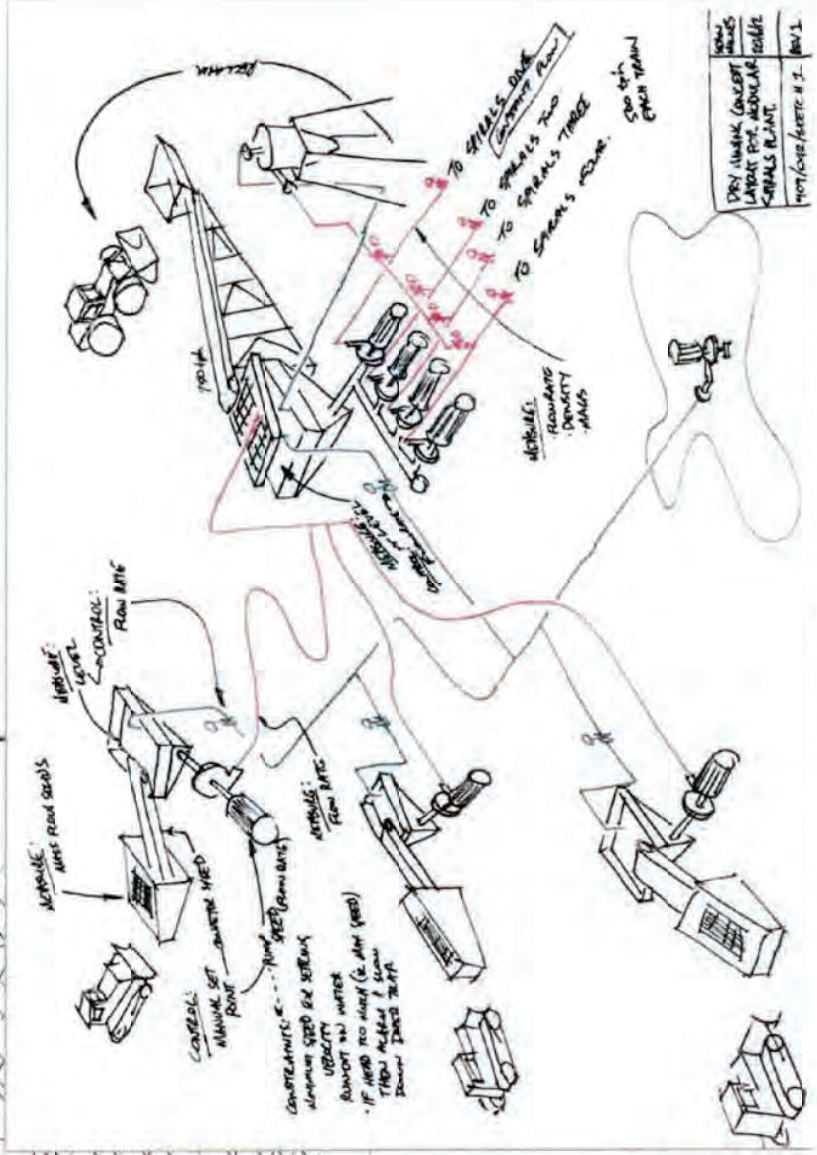


<p>Not to scale - Indicative only</p> <p>CAD DRAWING, NO HUMAN BEINGS PERMITTED</p>		<p>DATE: 16 October 2017</p> <p>PROJECT: Taharua Mining Operation</p> <p>CONTRACTOR: [Company Name]</p> <p>DESIGNER: [Company Name]</p> <p>SCALE: 1:1000</p>
<p>Proposed future Taharua mining operation - process flow diagram</p>		<p>DATE: 16 October 2017</p> <p>PROJECT: Taharua Mining Operation</p> <p>CONTRACTOR: [Company Name]</p> <p>DESIGNER: [Company Name]</p> <p>SCALE: 1:1000</p>

Changes to Mining Process

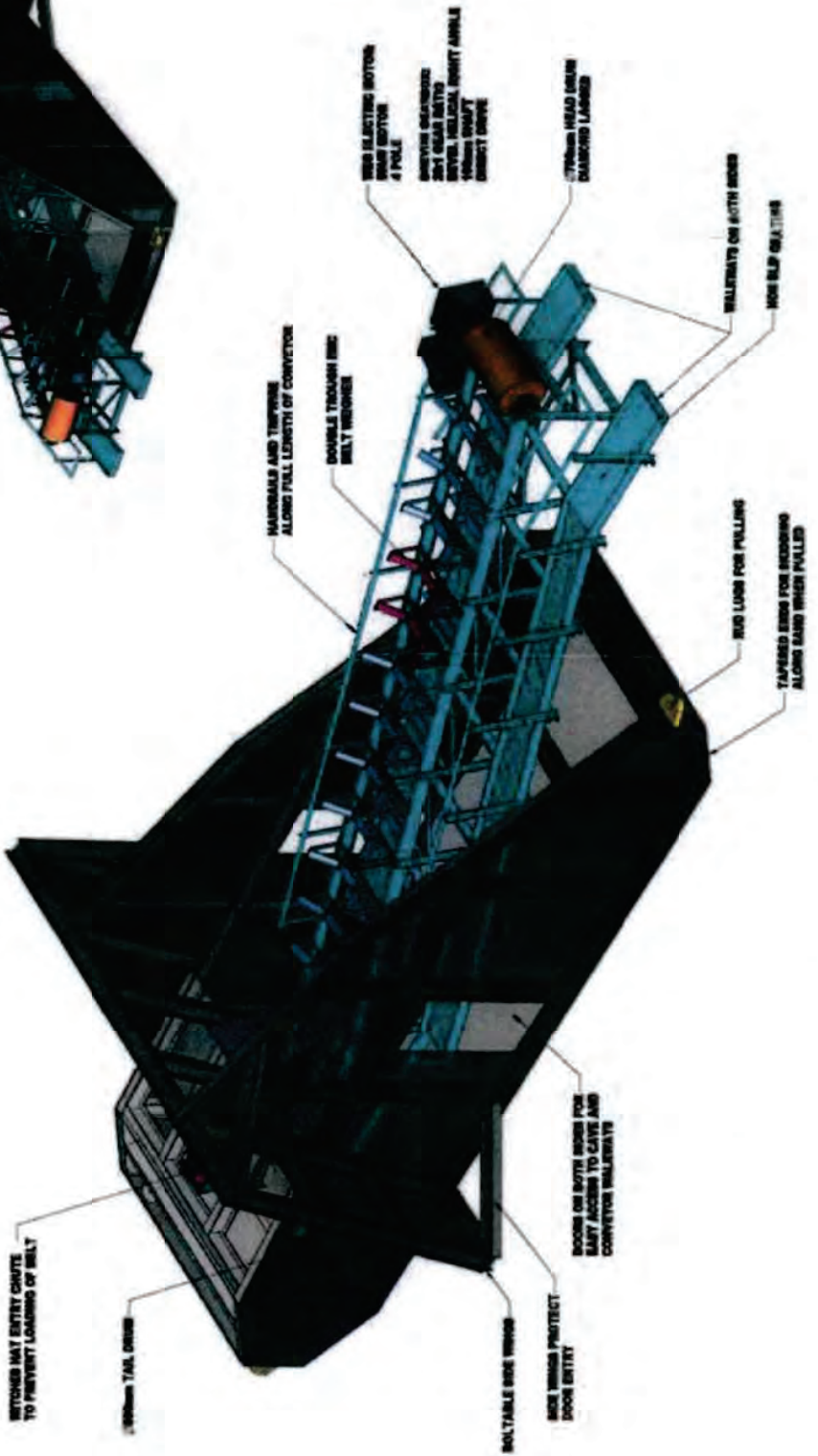
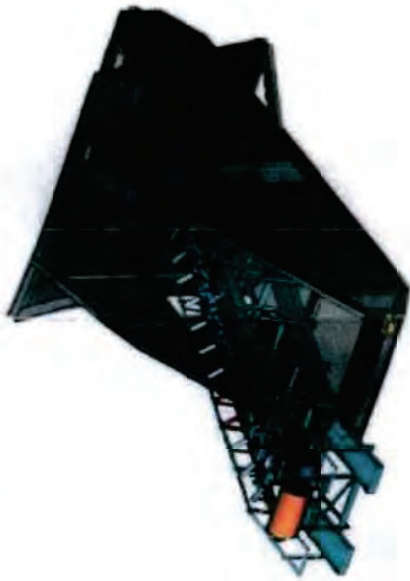


Bulldozers push sand to 'buried feeders' the sand is then slurried and pumped to the processing plant.

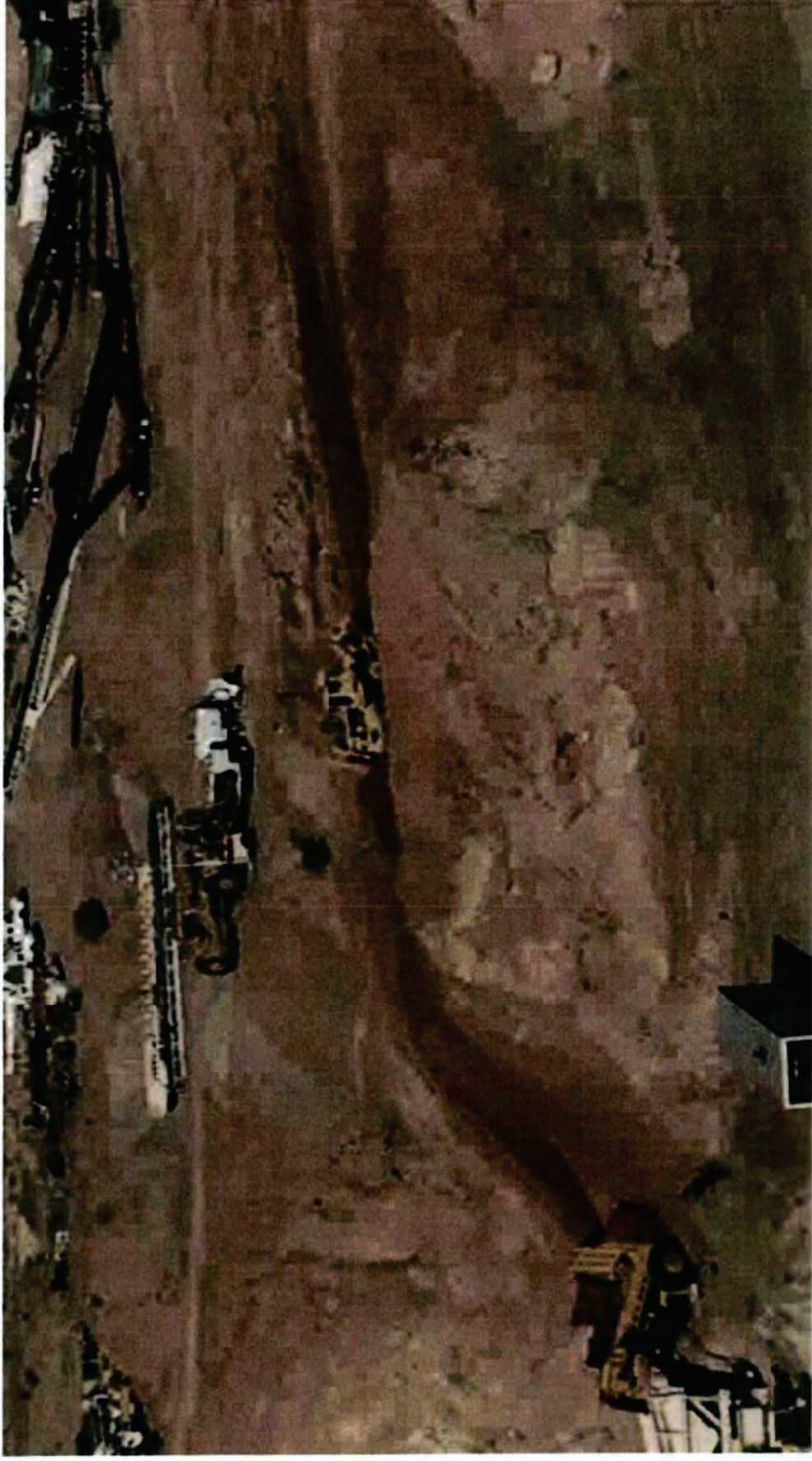


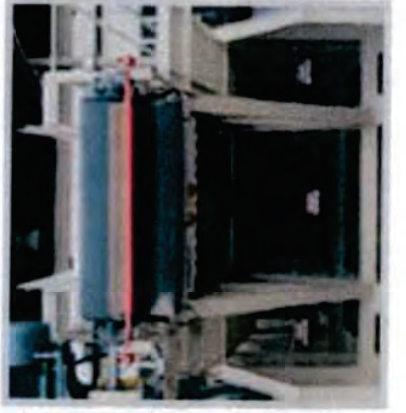
At the land based processing plant the slurry is screened then put through 'spiral' gravity separators to produce concentrate and tailings.

Dozer trap

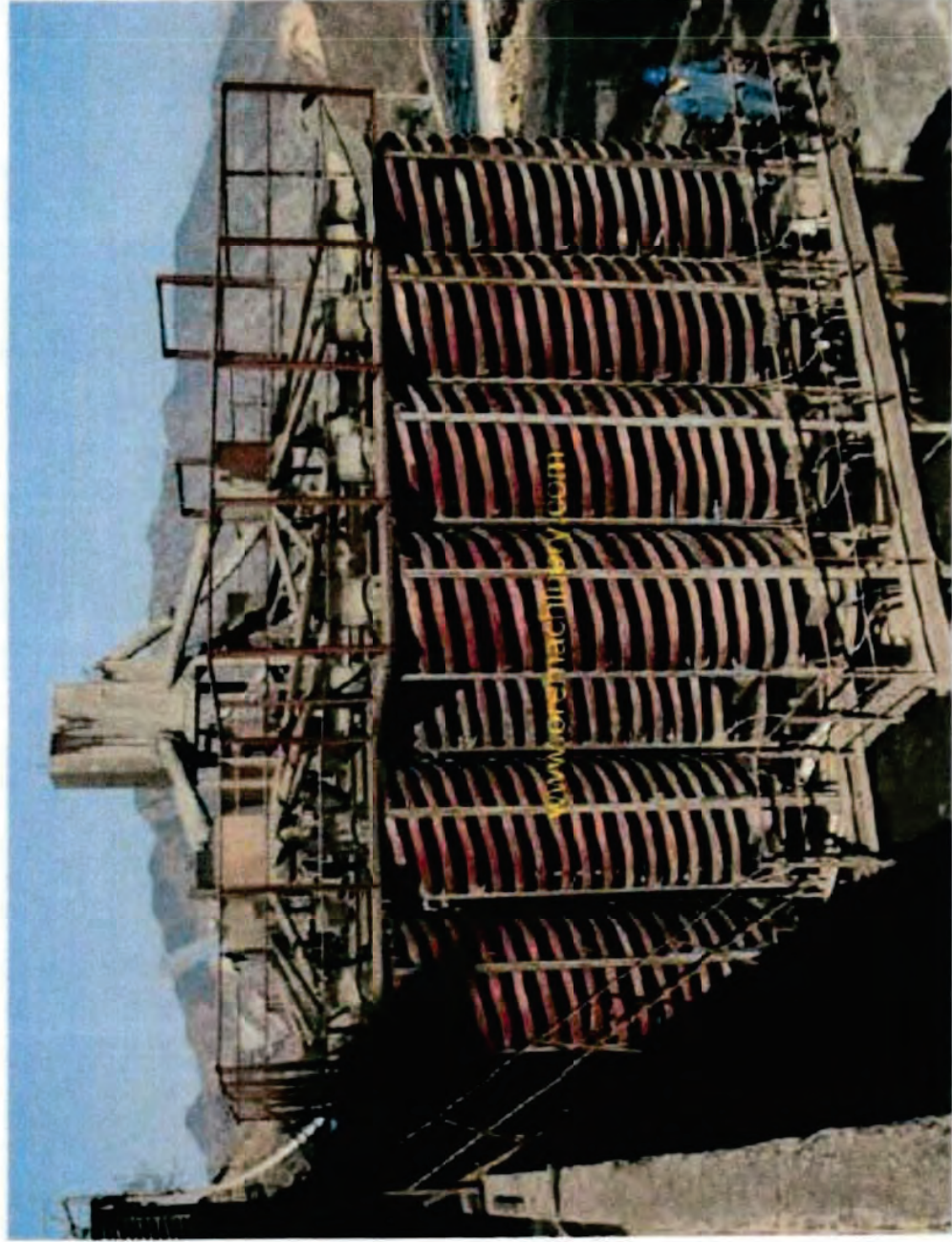


Video clip of a 'buried feeder' in Operation

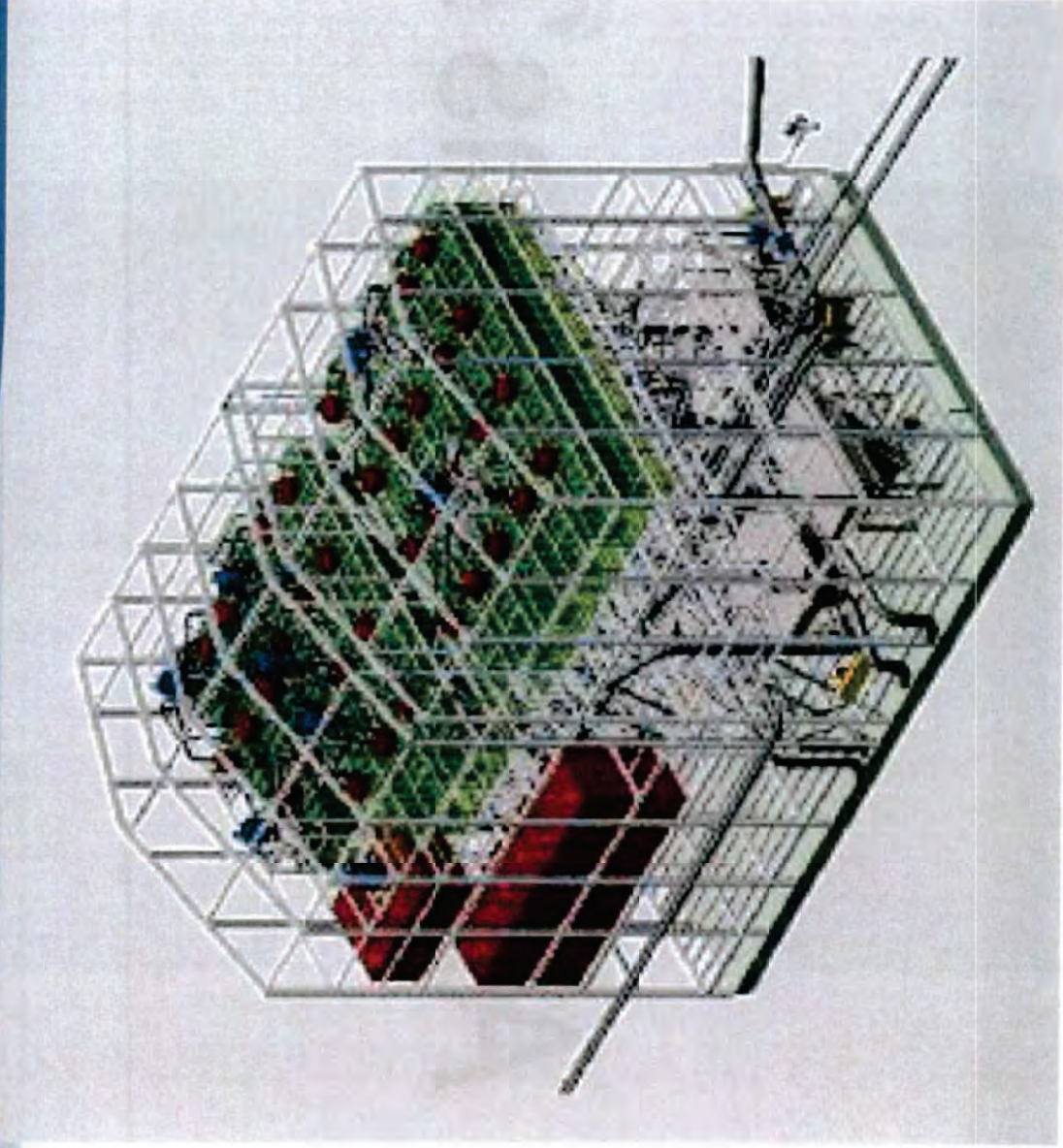




Typical Spiral Separation Plant



Spiral Separation Plant





Any questions?

Attendees **14th December 2012 Community Briefing**

Murray Lye	NZ Steel Project Director
Dougal Francis	NZ Steel Mining Manager
Theo Annandale	NZ Steel Project Manager
Rob Howell	NZ Steel Engineering Manager
Sean Milnes	NZ Steel Package Leader
Grant Blackie	Environment Waikato
Jorge Rodriguez	Environment Waikato

Appendix G

Hydrological Simulation Model Report



Taharoa Expansion Phase 2

Water Simulation Model

WATER SIMULATION MODEL

ADDENDUM: UPDATED FOR REVISED PLANT

For

TAHAROA EXPANSION PHASE 2



Taharoa Expansion Phase 2 Water Simulation Model

C	3.12.12	Addendum	P Wong	J Reed		
B	22.6.12	Final	P Wong	J Glynn	P Wong	
A	15.6.12	Draft	P Wong	J Glynn	P Wong	
Rev	Date	Description	Preparer	Reviewer	Approver	
			Signature	Signature	Signature	Signature



Taharoa Expansion Phase 2 Water Simulation Model

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1 Introduction

This report describes the results of simulation modelling that has been undertaken for the proposed Taharoa Expansion Phase 2 project referred to by the project as 'Stage 3'. This Stage 3 design includes new water circuits and a large Settling Pond at the tailings dam to be used as water storage.

The model has been used to explore potential modes of operation to identify how water use is affected and whether usage remains within consented limits. The key requirements of the existing consents are:

- For a maximum of 27,200 m³/d to be drawn from Lake Taharoa during mining operations;
- For a maximum of 75,000 m³/d for ship loading operations, subject to a maximum of 3,000,000 m³/a; and
- A minimum water level at Lake Taharoa of 8.53 m RL.

As part of the new operations, New Zealand Steel are applying for variation to the consent conditions to remove the restriction on using water only for mining or ship loading operations. The consent would be subject to the same conditions, .i.e. a maximum of 27,200 m³/d during mining operations increasing to 75,000 m³/d during ship loading. This report investigates this scenario, together with assessing the sensitivity of the water balance to various assumptions.

2 Model Objective

The objective of the simulation model is to assess the water usage of the Stage 3 plant. The model will be used to run sensitivity tests for certain operating parameters and this will provide information to the Compliance Management Plan.

3 Model Changes and Inputs

The model was originally prepared for the purpose of investigating the water balance for the existing mine. The model has been updated according to the following information for the future Stage 3 plant configuration. All other parameters are unchanged from the original model described in Revision B of this report.

- Flow schematic detailing the new water circuits [Taha Process Configs.xlsx].
- Water balance detailing the flows through the water circuits [Taharoa Flows Spirals Rev1.xlsx, Rev 2.0, 2 August 2012].
- Volumes of new Settling Ponds and Process Water Ponds [Taharoa Ponds.xlsx].
- Shipping rate of 16 ships/a.

4 Scenarios

The following scenario runs were used to investigate both the baseline water balance and the sensitivity to different assumptions.

- **Baseline:**
The revised plant as described in Section 3 for the water balance.

- **Scenario 1:**
The baseline water balance assumes a water loss from tailings of 20%, although this could be greater in practice.

This scenario will involve the baseline being rerun with water losses of 50%.

- **Scenario 2:**
The model has been run to date with an average ROM grade of 23%. The lowest expected grade is 18%. If lower grade ROM feed is used, this will require more ROM to be processed in order to maintain concentrate production levels which will also require more water. This scenario is unlikely to occur in practice, as a range in ore grade will be mined during any one year.

This scenario involves decreasing the grade to 18% and increasing ROM feed to still produce 2,700,000 t/a.

- **Scenario 3:**
It is expected that tailings are currently disposed of in a 55% solids slurry. It may be possible to recover additional water by thickening to a material that is 75% solids, therefore recovering additional water.

This scenario will involve the baseline being rerun with final tailings being disposed at a solids concentration of 75%.

The basic parameters for each scenario that are not detailed in Section 3 are detailed in Table 1.

Table 1: Model parameters common to all scenarios.

Plant production	2,700,000 t/a
Ship loadings	16 /a
Sea state data:	2008
Minimum consented level	8.53 m RL
Lake inflow data	22 years (1972 - 1993)

4.1 Baseline Plant Operation

The baseline run establishes the model response for the expected operation of the plant. The specific parameters for this run are detailed in Table 2. In order to meet the requirements of the consent and continue mining whilst ship loading, additional water is required to supplement ship

loading. This is in the form of water recovered from the tailings and stored in the Settling Pond. The volumes required are also shown in Table 2.

Table 2: Baseline input parameters.

Tailings water loss	20%
Final tailings solids concentration	55%
ROM grade	23%
ROM feed	2,000 t/h
Settling Pond water used to supplement lake water during ship loadings	45,000 m ³ /ship

Model Results

Fresh water usage was approximately 25,000 m³/d for plant operation only and 75,000 m³/d when ship loading as well (Figure 1). It is not surprising that the plant is operating close to resource consents given that the plant has been designed to maximise production within existing constraints.

Annual ship loading fresh water use is approximately 2,450,000 m³/a due to the water being supplemented from the Settling Pond. While this is significantly below the consent of 3,000,000 m³/a, this usage is dictated by the daily limit of 75,000 m³/d.

In six of the twenty two years, lake level dropped below the minimum of 8.53m (Figure 2). During dry years, mitigation measures would be required (i.e. reduced production) so as to reduce water use as lake levels reduce.

Discussion

The water allowance for ship loading has been set at 206,000 m³/ship. For the expected 16 ships/a, this equates to 3,300,000 m³/a; more than the 3,000,000 m³/a that the existing resource consents allow for. The plant design has allowed for 30,000 m³/ship of water from the Settling Pond to be used to supplement fresh water during ship loading in order to stay within consent. This calculation appears to be based on the premise that ship loading and plant operation consents are separate activities subject only to their individual consents. However, as the limit of 75,000 m³/d would apply to both activities the volume of water required from the Settling Pond is in the order of 45,000 m³/ship (approx. 15,000 m³/d).

The Settling Pond is capable of being used as a buffer in this way but it will then require refilling between ship loads, most likely by only recycling a portion of the recovered tailings water back to the Process Ponds. This will cause the Processing Ponds to draw more lake water to compensate for this reduction in recycled tailings water.

The methodology is to draw as much water as is required from the Settling Pond to stay within 75,000 m³/d when ship loading. Following ship loading only as much water as is necessary will be returned to the Process Ponds to stay within 27,200 m³/d to enable the Settling Pond to be refilled as quickly as possible. Careful scheduling of ship loading, mining operations and pump operation will be required.

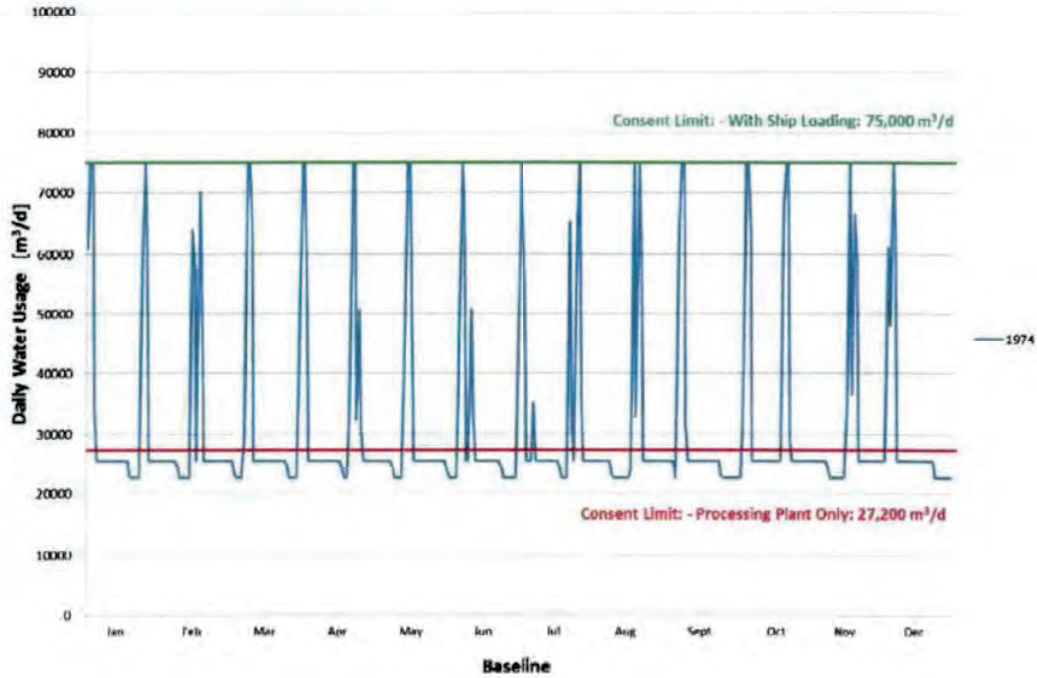


Figure 1: Baseline - daily lake water usage.

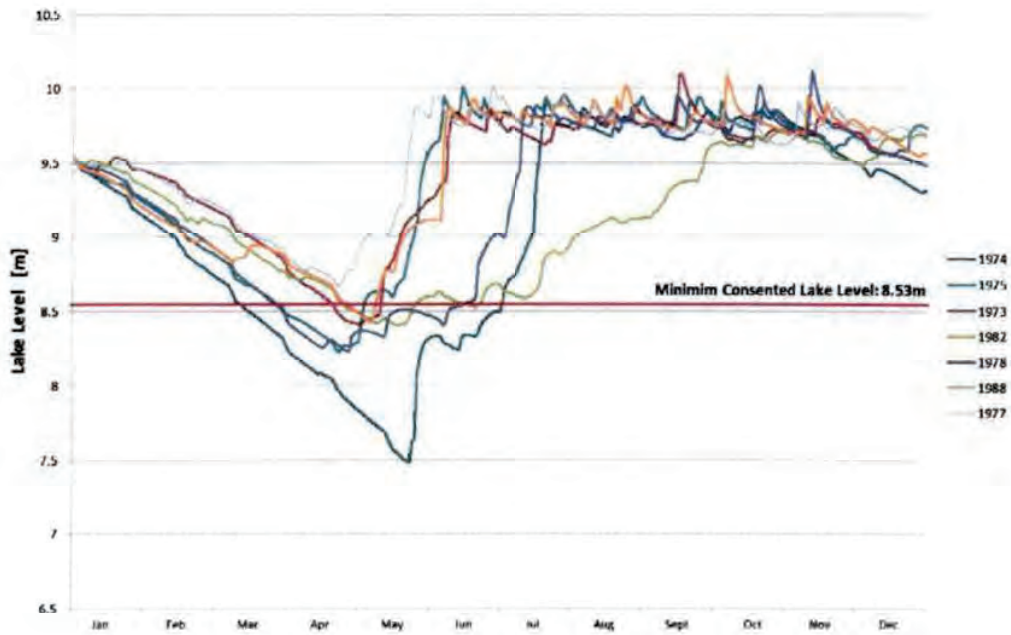


Figure 2: Baseline - lake level response.

4.2 Scenario 1: Tailings Dam Losses of 50%

It is possible that the water loss at the Tailings Dam will be greater than the 20% currently used in the plant design, up to possibly 50%. For this scenario, tailings losses were increased from 20% to 50%.

Table 3: Differences to the baseline simulations

Tailings water loss	50% (was 20%)
Final tailings solids concentration	55%
ROM grade	23%
ROM feed	2,000 t/h
Settling Pond water used to supplement lake water during ship loadings	45,000 m ³ /ship

Model Results

In this scenario there is less water available to return to the plant from the tailing settling pond. This results in a small increase in fresh water use with the subsequent increase in daily lake abstraction. Daily abstraction reaches 27,000 m³/d for mining operations and during ship loading exceeds 75,000 m³/d (as shown in Figure 3). In some scenarios, the Settling Pond was unable to refill in between ship loads causing higher fresh water usage during later ship loads (Figure 4).

Similar to the baseline simulations, in six of the twenty two years, lake level dropped below the minimum of 8.53m (Figure 5). As in the baseline scenario, mitigation measures would be required to manage operations during dry years.

Discussion

The increased losses reduces the volume of water recovered from tailings from 190 m³/h to 120 m³/h. This reduction is compensated by the Process Ponds drawing more fresh water from the lake to meet operational requirements.

In these runs, a little more than 75,000 m³/d is used during ship loading days and approximately 25-26,000 m³/d on other days. In some scenarios, the reduced recycled tailings water meant that the Settling Pond did not refill itself between ship loads and eventually ran dry towards the end of the simulations, as indicated by the increase in water usage to 95,000 m³/d for the last ship loads as lake water was required to compensate (Figure 4). This would reinforce the observation from Section 4.1 that the recycling of water from the Settling Pond is likely to need to be actively controlled to balance the need to refill within the available time and the need to recycle as much water as possible.

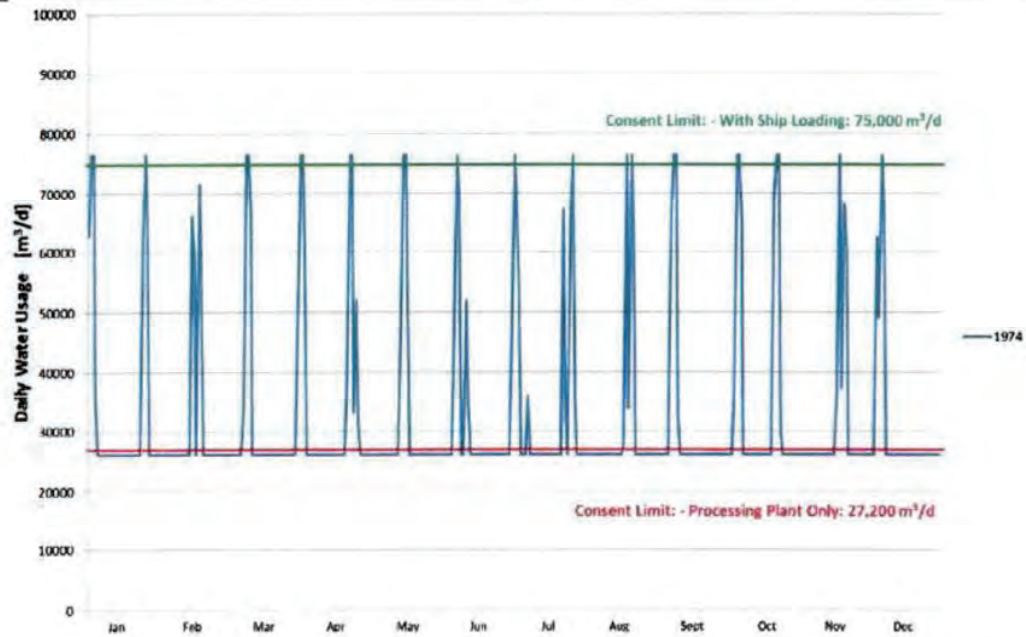


Figure 3: Scenario 1 - daily lake water usage.

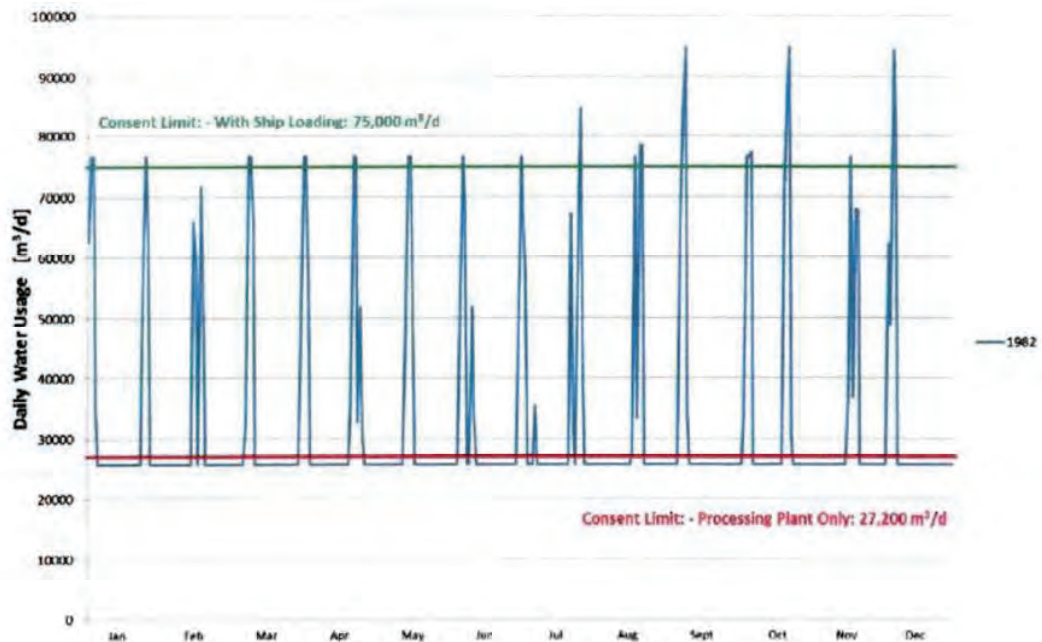


Figure 4: Scenario 1 - daily water usage without sufficient time to refill.

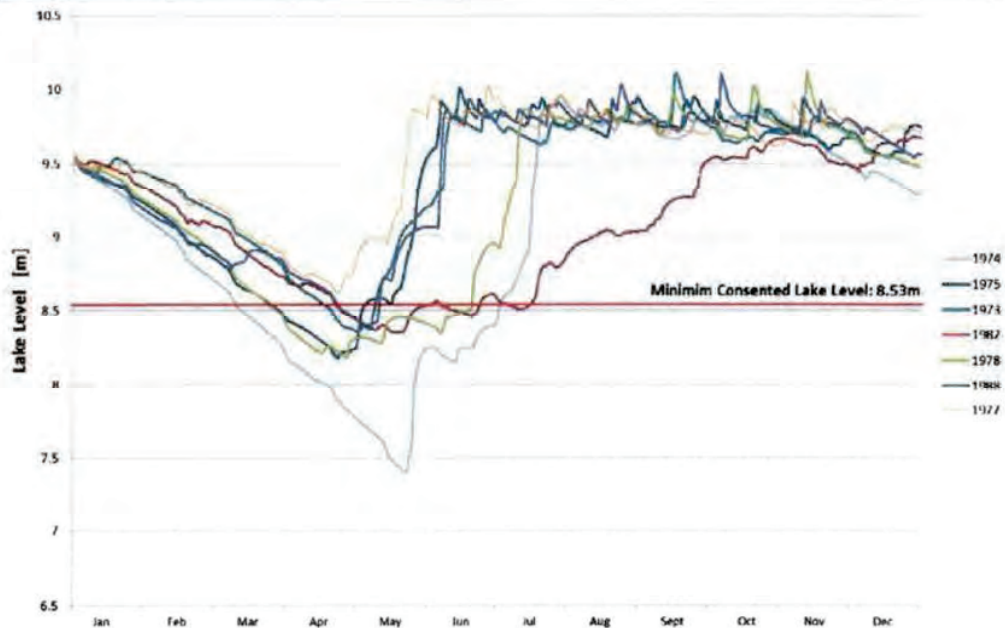


Figure 5: Scenario 1 - lake level response.

4.3 Scenario 2: ROM Grade Reduced to 18%

The lowest ROM grade expected to be processed is 18%. This compares to the average expected grade of 23%. In order to maintain 2,700,000 t/a of concentration, plant feed was raised from 2,000 t/h to 2,556 t/h.

Table 4: Scenario 3 input parameters

Tailings water loss	20%
Final tailings solids concentration	55%
ROM grade	18% (was 23%)
ROM feed	2,560 t/h (was 2,000 t/h)
Settling Pond water used to supplement lake water during ship loadings	30,000 m ³ /ship

Model Results

Daily water abstraction exceeds 30,000 m³/d and 90,000 m³/d (Figure 6) indicating that it is unlikely that operating at 18% while maintaining production will be viable.

In ten of the twenty two years, lake level dropped below the minimum of 8.53m (Figure 7). This gives an approximate 50% probability that mitigation will be required to protect against low lake level.

Discussion

The drop in grade to 18% decreases concentrate production to 2,100,000 t/a. To maintain the targeted 2,700,00 t/a, plant throughput was scaled up by 30% which increases water usage by 40%. This scenario used significantly more water than consents allow for, as would be expected given that the baseline was close to consent limits. Should 18% ore be processed through the plant, a reduced production rate will need to be accepted or blended as part of a range of grades.

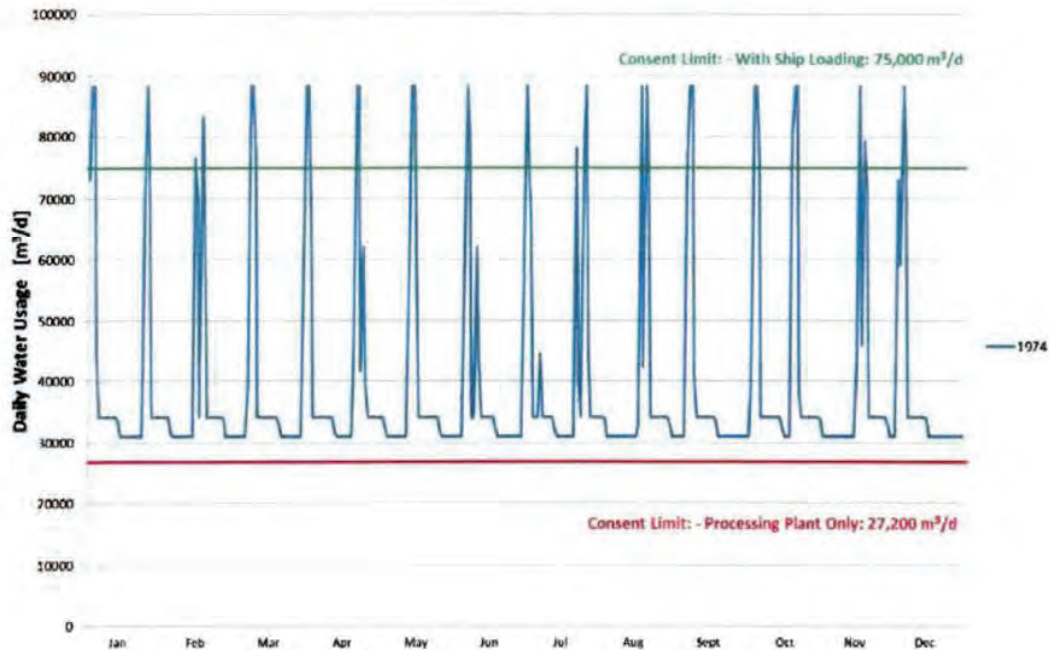


Figure 6: Scenario 2 - daily lake water usage.

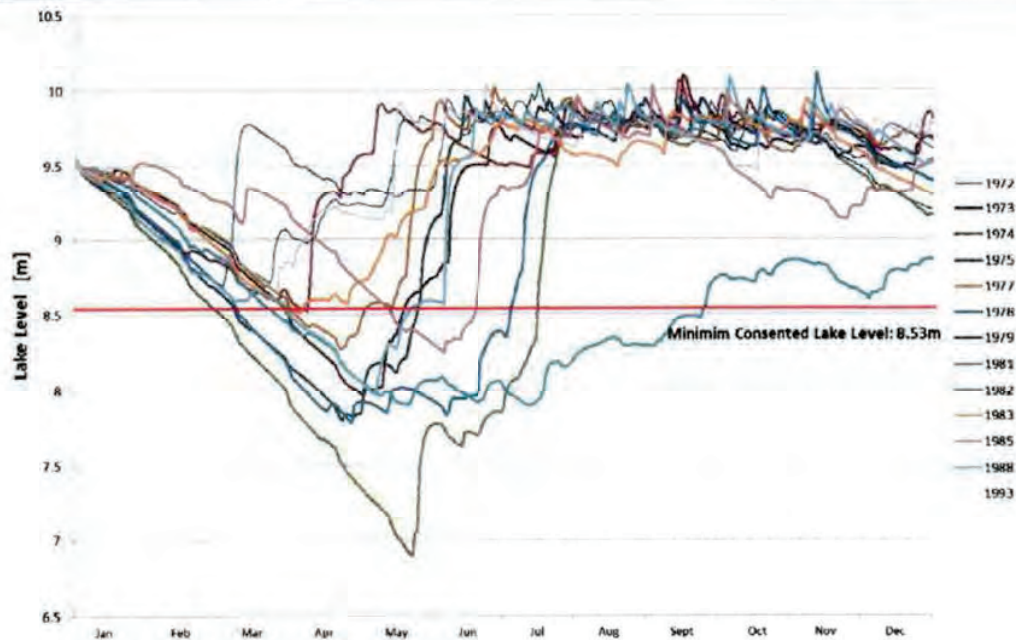


Figure 7: Scenario 2 - lake level response.

4.4 Scenario 3: Tailings Dam Water Recovery of 75%

Tailings are pumped to the Tailings Dam where water is recovered and sent to the Settling Pond for recycling back to the Process Ponds. The amount of water recovered depends on the losses incurred (the subject of Scenario 1) and the solids concentration that can be achieved in the final tailings. The base case concentration is 55% but it may be possible to increase this up to 75%, leading to more water being recovered.

Tailings water loss	20%
Final tailings solids concentration	75% (was 55%)
ROM grade	23%
ROM feed	2,000 t/h
Settling Pond water used to supplement lake water during ship loadings	30,000 m ³ /ship

Model Results

Daily lake water draw decreases to approx. 10,000 m³/d due to the increased water from the Settling Pond. Shiploading water remains at approx. 70,000 m³/d (Figure 8). This could be reduced if desired by increasing the amount of Settling Pond water that supplements ship loading.

In one of the twenty two years, lake level dropped below the minimum of 8.53m (Figure 9). This gives an approximate 5% probability that mitigation will be required to protect against low lake level.

Discussion

At 55%, the amount of water recovered from tailings is 190 m³/h. At 75% this increases to 690 m³/h. This increase of 500 m³/h is considerable given that the baseline freshwater draw is 939 m³/h. This will reduce lake water usage by approx. half. This may allow for further expansion of plant throughput.

Also of significance is that this amount of water being recovered from tailings is greater than the amount being drawn from the Settling Pond to supplement ship loading. When 30,000 m³ of Settling Pond water is being used, this equates to 430 m³/h. For 45,000 m³, this equates to 642 m³/h. As 690 m³/h is available with 75% tailings, water will always be recycled back to the Process Ponds even when water is being used for ship loading. This would allow for greater amounts of water to be supplemented from the Settling Pond as it is more easily refilled.

The magnitude of the benefits gained from a higher final tailings solids concentration suggests that efforts should be prioritised towards improving this area before others.

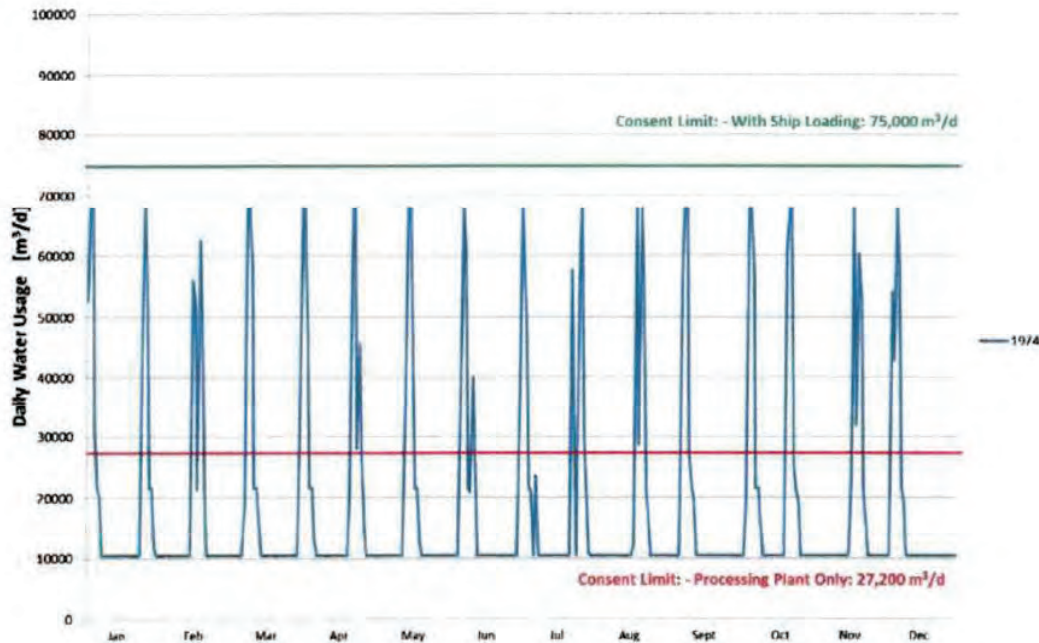


Figure 8: Scenario 3 - daily lake water usage.

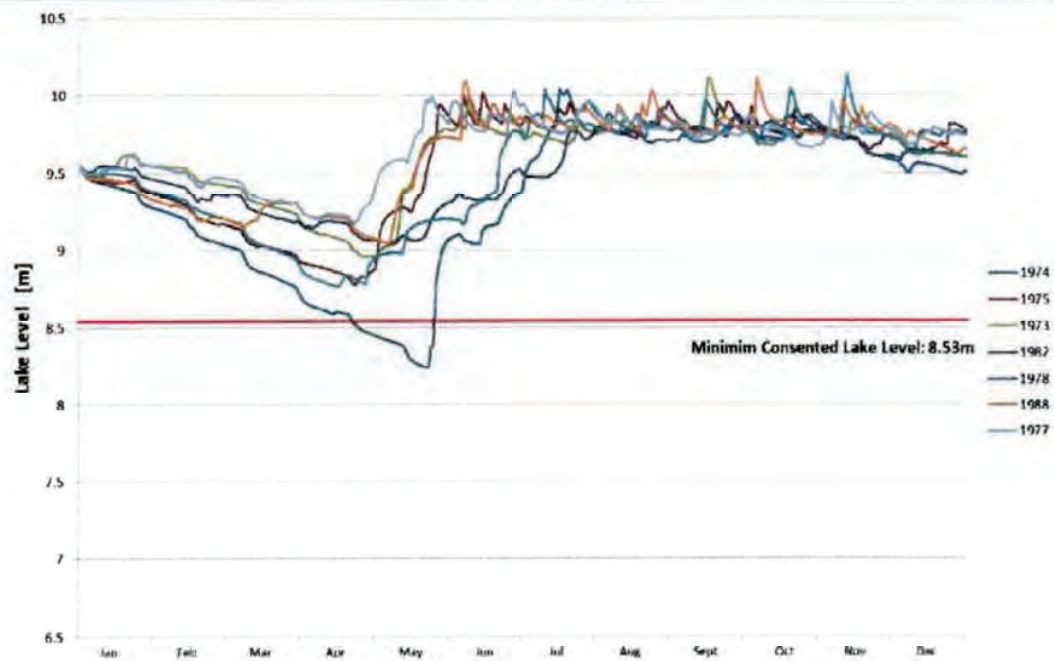


Figure 9: Scenario 3 - lake level response.

5 Conclusions

The scenario runs have examined several operating parameters which will have an effect on the water that the plant draws. Of these, the final tailings solids concentration has a large effect as detailed in Scenario 3 (Section 4.4). Maximising the amount of water recovered from the tailings disposal would bring significant benefits that would be worthwhile to progress.

Processing 18% ROM material while maintaining the production rate required to achieve 2,700,000 t/a will cause water usage to exceed consented limits. The plant can stay within limits if the production rate is lowered however, the situation would be improved significantly if the 75% tailings solids concentration of Scenario 3 can be achieved.

While Scenario 1 (increased tailings water losses of 50%) did not show a large effect, it indicated that the recycling of water to the Process Ponds and the refilling of the Settling Pond between ship loads will likely need to be managed to keep within consent limits and maintain the level in the Settling Pond.

Appendix H
Water Take records (ship loading and mining)
2007 to 2012

100906 Take Shiploading					
	Monthly total (m ³)	YTD	Daily Average during ship loading	Number of days ship loading	Max Take
Jul-07	88702	88,702	12672	7	46100
Aug-07	156391	245,093	31278	5	67603
Sep-07	0	245,093			
Oct-07	172110	417,203	43,028	4	69548
Nov-07	0	417,203			
Dec-07	147366	564,569	29473	5	62310
Jan-08	0	564,569			
Feb-08	146320	710,889	36580	4	76037
Mar-08	140593	851,482	28119	5	57019
Apr-08	7480	858,962	3740	2	4970
May-08	143189	1,002,151	47730	3	64176
Jun-08	145590	1,147,741	36398	4	61869
TOTAL	1,147,741	1,147,741	29891	Annual max 3,000,000 m ³	

100905 Take Mining			
	Monthly Total (m ³)	YTD	Daily Average less ship loading days
Jul-07	268369	268,369	11182
Aug-07	307921	576,290	11843
Sep-07	297961	874,251	9932
Oct-07	185620	1,059,871	6875
Nov-07	247048	1,306,919	8235
Dec-07	253286	1,560,205	9742
Jan-08	235906	1,796,111	7610
Feb-08	301187	2,097,298	12549
Mar-08	289356	2,386,654	11129
Apr-08	247563	2,634,217	8842
May-08	111785	2,746,002	3992
Jun-08	55097	2,924,643	2119
TOTAL	2801099	2,924,643	8671

Annual max 9,928,000 m³ (27,200m³ per day)

100906 Take Shiploading					
	Monthly total (m ³)	YTD	Daily Average during ship loading	Number of days ship loading	Max Take
Jul-08	0	0	0		
Aug-08	137069	137069	34267	4	66295
Sep-08	137697	274766	27539	5	54170
Oct-08	0	274766			
Nov-08	9648	284414	4824	2	5275
Dec-08	139882	424296	46627	3	61529
Jan-09	138561	562857	34640	4	62638
Feb-09	0	562857			
Mar-09	151581	714438	37895	4	65314
Apr-09	0	714438			
May-09	0	714438			
Jun-09	161255	875693	32251	5	66651
TOTAL	875693	875693	24227		Annual max 3,000,000 m ³

100905 Take Mining					
	Monthly Total (m3)	YTD	Daily Average less ship loading days		
Jul-08	217169	217169	7005		
Aug-08	110905	328074	4108		
Sep-08	91814	419888	3673		
Oct-08	236273	656161	7622		
Nov-08	172067	828228	6145		
Dec-08	92765	920993	3313		
Jan-09	106267	1027260	3936		
Feb-09	148352	1175612	5298		
Mar-09	228873	1404485	8477		
Apr-09	187263	1591748	6242		
May-09	185903	1777651	5997		
Jun-09	111238	1888889	4450		
TOTAL	1888889	1888889	5522		
Annual max 9,928,000 m3 (27,200m3 per day)					
100906 Take Shiploading					
	Monthly total (m3)	YTD	Daily Average during ship loading	Number of days ship loading	Max Take
Jul-09	2,728	2,728	1,364	2	2,115
Aug-09	146,449	149,177	48,816	3	67,762
Sep-09	143,355	292,532	35,839	4	65,304
Oct-09	2,595	295,127	2,595	1	2,595
Nov-09	131,101	426,228	43,700	3	72,712
Dec-09	158,397	584,625	39,599	4	60,329
Jan-10	0	584,625			
Feb-10	138,304	722,929	27,661	5	60,237
Mar-10	171,214	894,143		Not recorded	
Apr-10	0	894,143		0	
May-10	134,236	1,028,379	44,745	3	68,547
Jun-10	118,105	1,146,484	39,368	3	52,750
TOTAL	1,146,484	1,146,484	31,521		Annual max 3,000,000 m3
100905 Take Mining					
	Monthly Total (m3)	YTD	Daily Average less ship loading days		
Jul-09	180,159	180,159	6212		
Aug-09	156,401	336,560	5586		
Sep-09	108,267	444,827	4164		
Oct-09	152,400	597,227	5080		
Nov-09	197,969	795,196	7332		
Dec-09	305,447	1,100,643	11313		
Jan-10	230,455	1,331,098	7434		
Feb-10	346,015	1,677,113	15044		
Mar-10	107,075	1,784,188			
Apr-10	216,290	2,000,478	7210		
May-10	145,200	2,145,678	5186		
Jun-10	127,308	2,272,986	4715		
TOTAL	2,272,986	2,272,986	7207		
Annual max 9,928,000 m3 (27,200m3 per day)					

100906 Take Shiploading					
	Monthly total (m3)	YTD	Daily Average during ship loading	Number of days ship loading	Max Take
Jul-10	0	0		0	
Aug-10	111,531	111,531	37,177	3	41,600
Sep-10	143,355	254,886	47,785	3	65,304
Oct-10	94,481	349,368	31,494	3	39,145
Nov-10	118,511	467,879	39,504	3	52,655
Dec-10	113,849	581,727	37,950	3	50,451
Jan-11	0	581,727		0	
Feb-11	117,875	699,602	39,292	3	50,322
Mar-11	0	699,602		0	
Apr-11	120,503	820,105	40,168	3	52,163
May-11	122,845	942,951	20,474	6	24,194
Jun-11	0	942,951		0	
TOTAL	942951	942951	32649	Annual max 3,000,000 m3	
100905 Take Mining					
	Monthly Total (m3)	YTD	Daily Average less ship loading days		
Jul-10	111,370	111,370	3,593		
Aug-10	101,067	212,437	3,610		
Sep-10	108,267	320,704	4,010		
Oct-10	98,795	419,498	3,528		
Nov-10	176,701	596,199	6,544		
Dec-10	90,398	686,597	3,229		
Jan-11	118,387	804,984	3,819		
Feb-11	124,821	929,805	4,993		
Mar-11	183,577	1,113,382	5,922		
Apr-11	146,874	1,260,256	5,440		
May-11	131,619	1,391,875	5,265		
Jun-11	220,722	1,612,597	7,357		
TOTAL	1,612,597	1,612,597	4,776		
Annual max 9,928,000 m3 (27,200m3 per day)					
100906 Take Shiploading					
	Monthly total (m3)	YTD	Daily Average during ship loading	Number of days ship loading	Max Take
Jul-11	118,128	118,128	39,376	3	44,590
Aug-11	0			0	
Sep-11	127,548	245,676	42,516	3	57,420
Oct-11	0			0	
Nov-11	122,251	367,927	40,750	3	53,087
Dec-11	147,349	515,276	49,116	3	64,131
Jan-12	0			0	
Feb-12	0			0	
Mar-12	144,156	659,431	48,052	3	61,484
Apr-12	0			0	
May-12	348,358	1,007,789	58,060	6	72,292
Jun-12	193,873	1,201,662	48,468	4	65,583
TOTAL	1,201,662	1,201,662	46,620	Annual max 3,000,000 m3	

100905 Take Mining			
	Monthly Total (m3)	YTD	Daily Average less ship loading days
Jul-11	119,667	119,667	4,274
Aug-11	81,319	200,986	2,623
Sep-11	126,389	327,375	4,681
Oct-11	74,354	401,729	2,399
Nov-11	129,795	531,524	4,807
Dec-11	139,027	670,551	4,965
Jan-12	137,963	808,514	4,450
Feb-12	202,389	1,010,903	6,979
Mar-12	170,583	1,181,487	6,092
Apr-12	115,202	1,296,689	3,840
May-12	95,565	1,392,254	3,823
Jun-12	51,744	1,443,998	1,990
TOTAL	1,443,998	1,443,998	4,244
Annual max 9,928,000 m3 (27,200m3 per day)			



*** REPRINT ***



Waikato Regional Council
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Phone: (07) 859 0999
Fax: (07) 859 0998
www.waikato.govt.nz
GST #: 52-061-121

Date: January 11, 2013
Receipt: RC3694324
Amount Received: \$500.00

DEBTOR HOLDING ACCOUNT
Waikato Regional Council

MURRAY LYE-PROJECT DIRECTOR, NZ
STEEL LTD, CONSENT FOR
GROUNDWATER TAKE

Payment received with thanks

Attachment 5: Correspondence with Waikato Regional Council

27th March 2024

Mark Row
Team Leader- Technical Consents Support
Waikato Regional Council
160 Ward Street,
Hamilton

Dear Mark,

We are sending this letter due to concerns that we have in regard to current mining operations being undertaken by Taharoa Ironsands Limited at the Central and Southern Block located on land legally described as Taharoa C Block in Tahaaroa. **Image 1** shows the location of our dwelling from the Central Block.

Resource consents associated with mining operations lapsed in December 2020. The Waikato Regional Council has used their discretion under Section 124(2)(e) RMA to allow TIL to continue to operate under the existing consents until such time as a new consent is granted/ declined and all appeals are determined.

When the Waikato Regional Council considered TIL's request to allow them to continue to operate under 124(2)(e) RMA it seems that effects on us were not adequately considered. We were never consulted in regard to this S124 request.

Continued Mining operations under S124(2)(e)

The current resource consent application (APP142035) was lodged with WRC in July 2020. The direct effects on us during the three year period (since consent lapse date) within which TIL have been permitted to continue operating have been significant.

As can be seen in the attached photos, operations have impacted on a natural buffer which has, up until recently, protected us from experiencing the most significant effects of the mining operations at the Central Block. **Photo 1** shows the location of the current works in proximity to the Wetini whaanau dwelling and ancillary buildings. As can be seen in **photo 2**, at the consent expiry date in 2020 works had commenced at this hill however this natural buffer had not been significantly impacted on. When comparing the landscape with that which now exists (**photo 3**), it is clear to see that the changes within this period have been significant. More recently, mining of this hill has begun to occur at an alarming rate (**photo 4**). The changes to the landscape in the course of one week are significant. With the removal of a portion of this hill we now have an open view into the mine site.

The buffer is located to the south-west of our dwelling being the direction of the prevailing winds. As of late last year when the impact on this buffer became more significant we have begun to experience clay dust within our dwelling. **Photo 5** shows generation of dust from the site as viewed from Wetini whaanau homestead. This is visible on surfaces including

benches, on the ventilation within the kitchen, toilet cistern and on the roof which washes into our water tank and potable water supply. We have lodged complaints in regard to instances where this occurred on 7th February, 8th March and 18th March (REQ206397, REQ207531 and REQ207976). To date we have received no response from WRC in regard to these complaints.

In addition to impacts on air quality, the removal of this buffer and close proximity of existing mining activities has increased the level of noise received at our dwelling. When staying in Tahaaroa recently on 5th March, both myself and my father experienced a sleepless night due to the location of works which were taking place on the top of what remains of this hill. We understand that noise effects fall within the jurisdiction of the Waitomo District Council and we have lodged a noise complaint with WDC in regard to this matter. The Waikato Regional Council has however allowed TIL to continue to operate under S124 of the RMA including undertaking works in close proximity to our boundary which have significantly impacted this buffer. This is the reason for the increased noise effects on us. When allowing TIL to continue operating there needs to be certainty that these works can and will be undertaken in accordance with the requirements of the Waitomo District Plan. We are concerned at the absence of an acoustic report and/ or noise management plan to confirm the current mining activities within the Central and Southern Block are being undertaken in accordance with the requirements of the Waitomo District Plan.

We recently met with TIL in regard to the resource consent application for the Northern Block (Pit 1).

While the intention of the meeting was to discuss the Northern Block, at this meeting, we expressed the following concerns in regard to activities at the Central and Southern Block;

- *Air quality- Clay dust is now being received inside our dwelling due to the impact of works on the hill;*
- *Noise- Machinery operating on the top of the hill was very loud and resulted in a disturbed night of sleep;*
- *We are concerned at the absence of remediation in terms of effects on the wider environment and we believe this has exacerbated effects on us particularly in regard to air quality effects.*

TIL advised that they intend to continue mining the hill within the current location moving towards the coastline with works being undertaken 30m from the Mitiwai Stream. We are unclear of the setback proposed from any wetlands. These works would result in the removal of this natural buffer. While Mr Martin confirmed they intend to reinstate this buffer following mining we have seen no evidence to confirm this is feasible/ possible.

TIL have confirmed it is their intention in the next 12-18 months to mine the hill located immediately behind the Kana residence. Mining of this hill would have a significant impact on our whaanau and whenua. We are deeply concerned that mining of this hill would result in our house becoming uninhabitable.

We are concerned at the impact that these operations have had to date on us and the likelihood that these effects will only increase as TIL continues to remove this natural buffer.

With the hearing being postponed until August and need for all appeals to be determined prior to issuing of a decision it could be some time before a decision is made to either grant or decline the consent.

In the meantime mitigation that we had intended to request at the hearing for the Central and Southern Block resource consent application now to be held in August i.e. minimum setbacks are likely to become irrelevant. Once this hill is removed the potential effects on us and our ability to connect to our ancestral land would be irreversible and have the potential to be devastating for our whaanau.

Remediation within the Central and Southern Blocks

In preparing for the hearing which was due to be held in February we have become aware of numerous breaches of the current conditions of consent in regard to remediation at the site. These breaches have been ongoing and have been reported in both the Annual Reports prepared by TIL (2017-2018, 2018-2019, 2019-2020, 2020-2021) and WRC Monitoring reports.

This absence of remediation has exacerbated the effects of the mining works on ourselves, other mana whenua adjoining the mine site and located within Tahaaroa village and the wider environment particularly in regard to air quality effects.

WRC's obligations under the Resource Management Act 1991

In considering an application under S124 of the RMA to enable a consent holder to continue to operate after their consent has expired, the WRC has an obligation to ensure that any decision promotes the purposes and principles of the RMA 1991. Of particular relevance to the ongoing mining activities are *Section 6(e), 7(a) and 8 RMA 1991* as included below.

6. Matters of National Importance

In achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall recognise and provide for the following matters of national importance:

6(e) the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga:

7. Other matters

In achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall have particular regard to—

(a) Kaitiakitanga

8. Treaty of Waitangi

In achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and

physical resources, shall take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).

The significant delays with the processing of the current resource consent application lodged in 2020 has meant that the effects we are now experiencing and those on the wider environment were not addressed as part of these now expired resource consent applications. In addition, we are concerned at breaches of conditions of existing consents (remediation) and a failure to effectively manage the effects of mining operations within the constraints of the Waikato Regional Plan (Air quality) and Waitomo District Plan (Noise).

We were never consulted in regard to the Central and Southern Blocks nor were we consulted in regard to the decision to enable TIL to continue operating under S124.

We are deeply concerned about impacts on the whenua that we are the kaitiaki for, our ability to connect to our ancestral land and those on the wider environment that could result from WRC continuing to enable TIL to operate under S124 of the RMA when the consents expired in 2020.

We request the cessation of mining activities in the current location (impacting on this natural buffer) until such time as:

- Rehabilitation activities are completed (as requested in the letter sent by Ngahuia Herangi on behalf of a number of parties including the Roy Wetini Whaanau Trust) as required under consent 100909;
- The three complaints we have laid (on 7th February, 8th March and 18th March 2024) in regard to the presence of clay dust within our dwelling are investigated by WRC and TIL puts in place measures to prevent this from reoccurring;
- Furthermore, TIL should be required to produce evidence (an acoustic report or monitoring data) to demonstrate existing and proposed activities within the Central Block being allowed by WRC under S124 will achieve compliance with Rule 20.5.1 of the Waitomo District Plan.

Ngaa mihi nui,



 (on behalf of the Roy Wetini Whaanau Trust)

Photo 1: Current operations in relation to Wetini dwelling

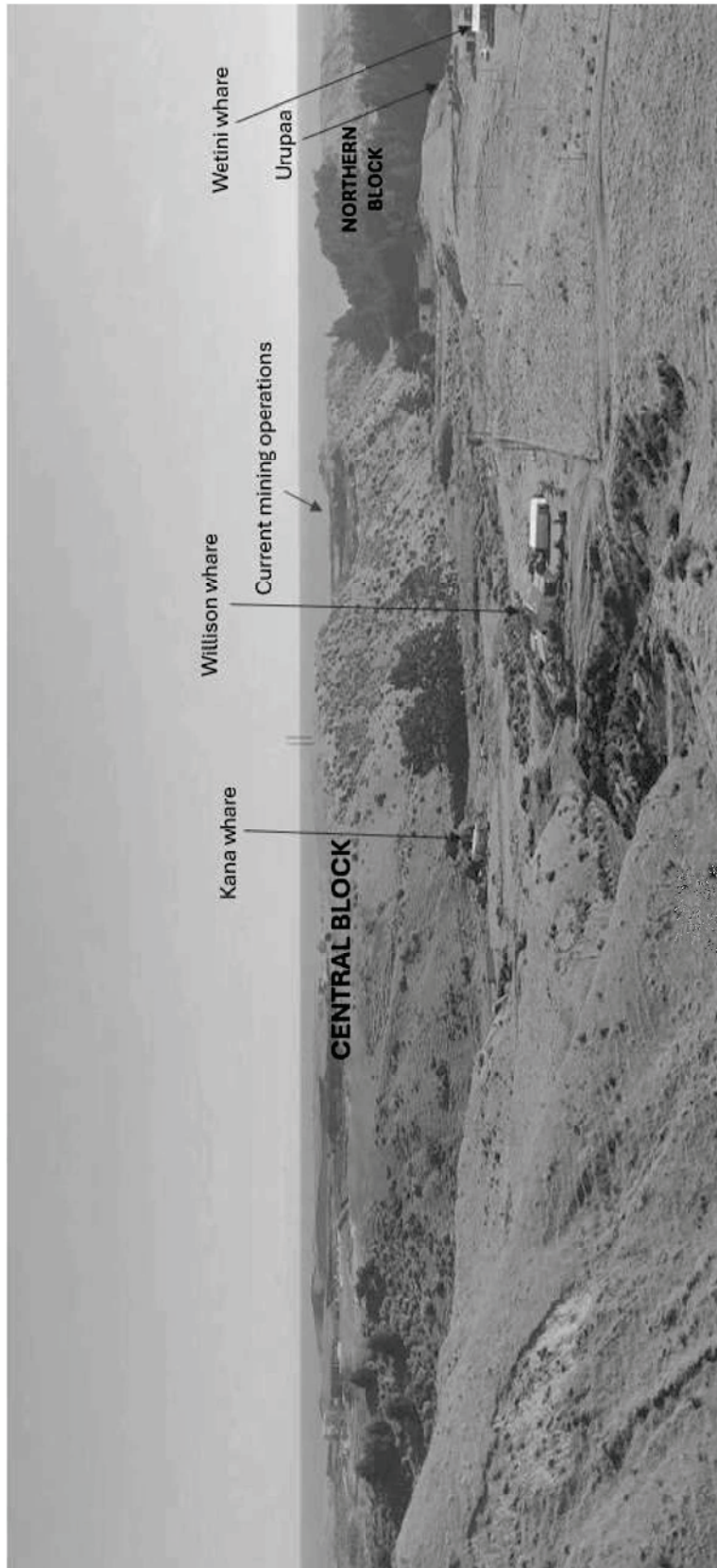




Photo 2: 7 October 2020



Photo 3: 13 March 2024

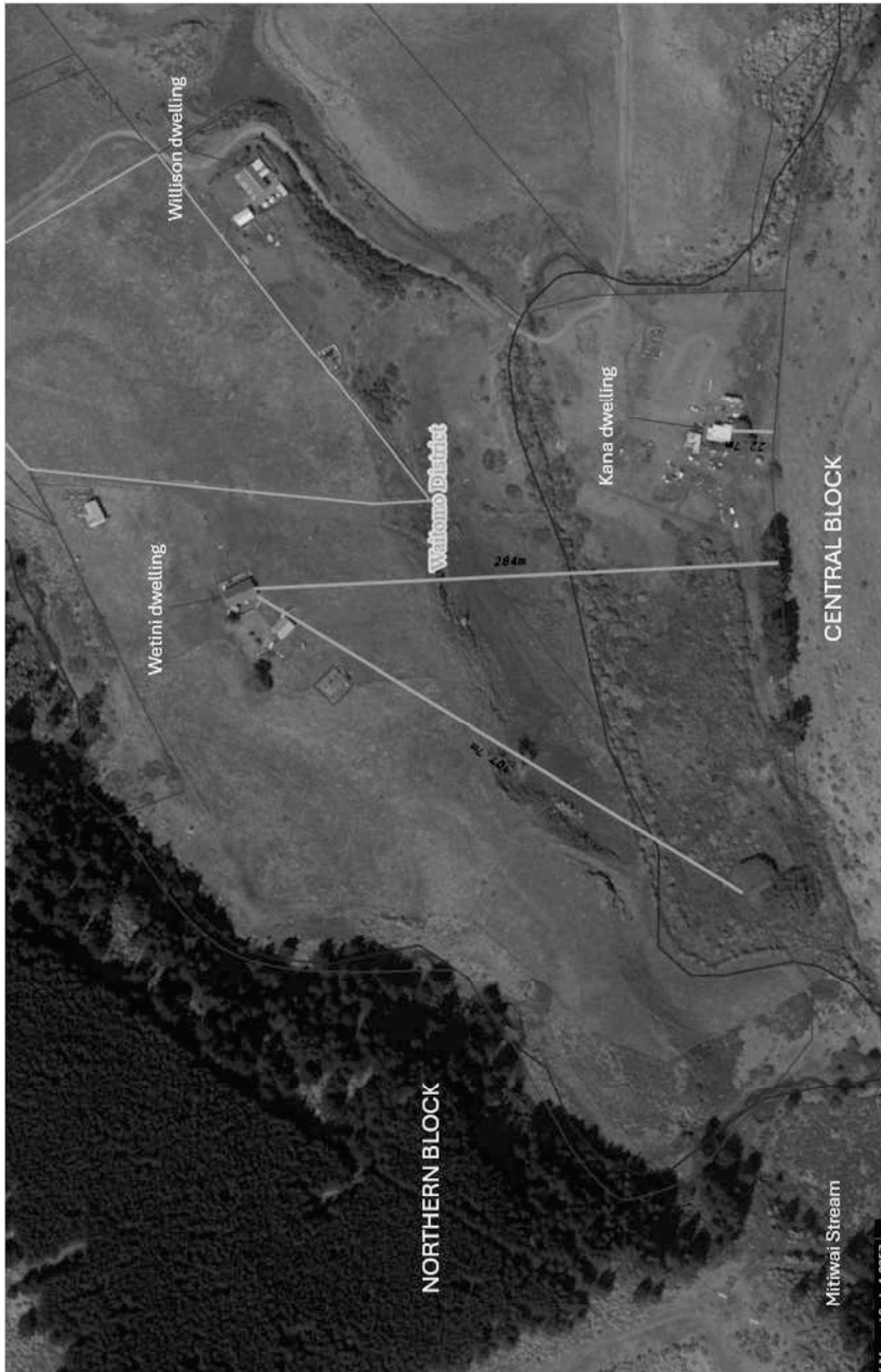


Photo 4: 17th March 2024- View to the Central Block from Wetini whaanau land (photo taken next to shed with red roof)



Photo 5 17th March- View to the Central Block from Wetini whaanau land (photo taken next to shed with red roof)

Image 1: Plan showing proximity of dwellings to Central Block



13th June 2024

[REDACTED]
Roy Wetini Whanau Trust
Email: Teina Wetini <twetini@yahoo.co.nz>



Private Bag 3038
Waikato Mail Centre
Hamilton 3240, NZ

waikatoregion.govt.nz
0800 800 401

Kia ora [REDACTED]

Taharoa Ironsands Operations and Applications

This letter is in reply to your letter dated 27th March on various matters relating to the Taharoa Ironsands Ltd (TIL) operations at Taharoa.

Continued Mining operations under S124

As noted in your letter the consents that authorise mining operations at the Central and Southern Blocks have expired. However, the Company is authorised to continue with their operations within these blocks as Council has exercised its discretion to allow the Company to continue to operate under s124 of the RMA. This provides for an applicant to continue to operate under the existing consents until a decision has been made on the current application. The application is scheduled to be heard at a hearing commencing 5th August 2024.

In your letter you state that Council did not consult with the Whanau Trust when exercising its discretion nor consider the effects on the Whanau Trust from the continued activities. Section 124 does not provide nor require Council to consider the effects on any party when exercising this discretion. Nor does it require Council to consult with any party. The purpose of s124 is to provide for an application process, for existing activities, to conclude whilst enabling the activities to continue until such time that a decision is made on the application. This section of the RMA allows for delays in the process including any appeals and provides for a fair process for all parties associated with replacing consents for existing operations.

Air Discharges from the Existing Operations

The issues you raise associated with the current operations and the effects on your residential property are still being looked into by WRC. However, in response to the complaints WRC staff have undertaken the following:

- WRC staff undertook a site visit to the mine site on 2 May 2024.
- Following the site visit communications from the Company are that new dust monitors are to be installed to better understand the off site effects of dust coming from the site. We understand that the location of these monitors are to be located to address the dust issues you raise within your letter and emails. We have been told that the Company has been communicating with you with respect to the dust monitors – if this is not the case please let Ed Prince know and we can follow this matter up.
- The Company has supplied a dust plan for the site which details additional measures proposed on site. WRC is currently in the process of reviewing this plan.

- WRC understand that the Company is planning to undertake on-site rehabilitation within the Central and Southern Blocks with approximately 15 hectares of planting to occur on coconut matting over the next month or so.
- WRC is continuing to look at methods to increase the Company's compliance level with the rehabilitation within these blocks.
- WRC were advised during the site visit that the current footprint for the buffer was as far as it would extend to. WRC has not received confirmation from the Company that the buffer will be remediated back to any other height other than what it is at now.

Northern Block Application (Pit 1)

Thank you for raising your concerns with respect to the Northern Block Application by TIL. The applicant has now responded back to the further information request as part of this process. The next step in this process is a notification decision.

Overall, WRC is looking into and addressing the following matters that you have raised:

- Measures to enable further rehabilitation within the site in a quick and effective manner;
- Final height of the buffer as part of the rehabilitation process; and
- Air discharge complaints.

Additionally, I note that the latest site compliance report assessment by WRC assessed the site as being in significant non-compliance. The report has requested a number of actions by the Company by the end of June. These reports may go some way towards addressing the issues raised in your letter.

Lastly, whilst I note that this outcome may not be what you are seeking these are the matters that WRC can and are currently addressing in response to your letter and complaints received.

Nāku noa
Nā



Sheryl Roa
Principal Advisor – Consents
Resource Use

Sheryl Roa,
Waikato Regional Council,
160 Ward Street,
Hamilton

13th January 2025

Kia ora Sheryl,

I am writing in response to your email received on 8th January informing the Roy Wetini Whaanau Trust that the Northern Block Pit 1 application was granted to Taharoa Ironsands Ltd on 24th December 2024 on a non-notified basis. We are extremely disappointed at both the decision made by WRC to process the application on a non-notified basis and with the decision itself.

The decision includes an incorrect map which includes both our whenua (that part containing our dwelling) and the urupaa within the mining lease area. I have on more than one occasion sent a map showing the correct boundaries to WRC and requested that this is updated. It is deeply offensive that this map has again been included not only in the application but in the Council decision. Please correct this error.

An absence of meaningful consultation has been undertaken by TIL and the decision by WRC to process the application on a non-notified basis has excluded the Roy Wetini Whaanau Trust and other affected parties from providing input into the process. While we met with TIL on 6th March, we subsequently sent the attached letter to TIL (forwarded to you on 27th March 2024) requesting further information which we have not received a response to. As a result, our concerns have not been addressed within the decision. We note that at the meeting with TIL we were advised the consent term would be for a period of 12-months which differs significantly from the 5-year term granted.

In regard to the direct effects of Northern Block- Pit 1 application on the Roy Wetini Whaanau Trust, we are particularly concerned in regard to the cumulative dust and air quality effects of the northern block- pit 1 on ourselves, our whenua and those living within the vicinity of the mine site.

We sent a letter to the Waikato Regional Council on 27th March 2024 expressing our concerns in regard to the increasing effects of current mining operations on us due to the mining of the ridgeline which separates us from the mining activities at the Central and Southern Block (see attached). You sent a reply dated 13th June which confirmed among other things that WRC had undertaken a site visit with TIL and that *"We were advised during the site visit that the current footprint for the buffer was as far as it would extend to."*

As you can see within **photos 1 and 2**, this has not been the case. Despite this confirmation from WRC mining works have continued to this ridgeline and the footprint of the works has increased significantly. The works are in close proximity to the Mitiwai Stream and wetlands below.

As a result of this mining and due to the absence of visible rehabilitation works across the site air quality and amenity effects as experienced by us have continued to increase. We are extremely disappointed that the Regional Council has granted consent for TIL to expand

operations to the northern block when the adverse effects generated by existing activities at the central and southern blocks have not been resolved.



Photo 1- Mining works in relation to Wetini whenua and dwelling
13 March 2024



Photo 2- Mining works in relation to Wetini whenua and dwelling
6 January 2025

At our most recent visit to Tahaaroa on clay dust was once again present inside our home and on arrival the mine site appeared to have a haze over it which was in fact clay dust (see photos below).

This was present not only at the location of the active mine site but across the entire site and towards Tahaaroa village. Dust was irritating our eyes when outside and we were forced to bring our children inside that afternoon. We will be contacting the monitoring department to report these issues.



Photos 3 and 4- Views from Wetini whaanau land towards Central Block and Tahaaroa Village
31 Dec 2024

Part 4 of the decision on the Northern Block- Pit 1 states:

“I note that there is the potential for Pit 1 to remain open once the ironsand is mined out to allow/wait for further development within the Northern Block. If this occurs then full and final rehabilitation of Pit 1 may be delayed.”

Under the consent, Pit 1 could remain open for the term of the consent being 5 years. This is unacceptable to us. Insufficient mitigation measures have been included within conditions of consent which focus on monitoring of dust levels as opposed to requiring staged rehabilitation to prevent the air quality issues from arising. These measures do not sufficiently address our concerns in regard to the cumulative effects of dust/ air quality and amenity effects.

No consideration has been given to impacts on the landscape, our amenity/ our ability to continue to connect to our ancestral lands.

In terms of addressing wider effects, the decision on the Northern Block- Pit 1 appears to disregard the recent decision on the resource consent application for the Central and Southern Blocks. This decision was made on the basis of expert evidence, submitter (including mana whenua) concerns.

In particular:

- In regard to Part 2 matters this decision found that Section 6(e), 7(a) and 8 were not adequately addressed within the Central and Southern Block resource consent application. In particular *“The lack of meaningful, early and focused engagement with Ngaati Mahuta members outside of Taharoa C has a direct impact on their ability to act as kaitiaki regards the Mitiwai Stream, Wainui Stream, Lake Tahaaroa and the wider cultural landscape and in respect to areas of waahi tapu.”* This decision concluded that *“by confining the Treaty relationship to the landowner and limiting opportunities for appropriate engagement of Mana Whenua, the principles of the Treaty of Waitangi are not adequately taken into account.”*

No meaningful engagement has been undertaken with us by TIL. By not identifying mana whenua adjoining the mine site, marae or hapuu as affected parties WRC appear to have disregarded this decision and excluded mana whenua from this process.

- The decision on the Central and Southern Blocks confirms “*a strengthened and structured framework is necessary to mitigate cultural effects of the consent including providing for such matters as kaitiakitanga and maatauranga Maaori.*” This appears to have been disregarded in the decision on the Northern Block- Pit 1 whereby no such framework has been included within the decision.
- Conditions imposed to mitigate effects on waterbodies and wetlands (based on expert advice) including (but not limited to) a 100m setback from the Mitiwai Stream appear to have been disregarded with only a 30m setback imposed.
- The decision on the Central and Southern Blocks highlights the importance of rehabilitation in managing air quality effects and conditions of consent are included to mitigate these effects. The conditions imposed on the Northern Block- Pit 1 appear to disregard this decision and conditions do not sufficiently mitigate our concerns regarding the cumulative dust/ air quality effects.

It is difficult to understand from reading the report how WRC have arrived at the conclusion that the effects on the Roy Wetini Whaanau Trust will be less than minor. If you can please send through the notification decision this may provide greater clarity on how this decision was reached.

I understand that we have 28 working days from the date of decision should we wish to seek a judicial review. As this decision was issued on 24th December 2024, I understand we are on the second working day since the decision was issued. If you can please check in the Council system and confirm this is correct that would be appreciated.

Nгаа mihi,



[REDACTED] on behalf of the Roy Wetini Whaanau Trust)

18th December 2025

Waikato Regional Council
ATTN: Mark Row
Team Leader- Technical Consents Support
Waikato Regional Council
By Email: [REDACTED]

Complaint by Roy Wetini Whaanau Trust- Taharoa Ironsands Limited

Dear Mark,

We are sending this letter due to our continuing concerns regarding current mining operations being undertaken by Taharoa Ironsands Limited at the Central and Southern Blocks.

Wetini whaanau land adjoins the Central and Northern Blocks of the mine site. We have expressed concerns previously in letters sent to Waikato Regional Council on 27th March 2024 and 13th January 2025 about the significant effects being experienced due to the close proximity of the works and impact on a ridgeline that previously protected us from the most significant effects from the mine. Of particular concern are impacts on air quality, presence of clay dust inside our dwelling, amenity and our ability to continue to connect to our ancestral lands.

While consents have expired, WRC has used their discretion to allow TIL to continue operating under S124(2) RMA. TIL's appeal to the current decision remains on hold and TIL have lodged a fast-track application under the FTAA. TIL have recently requested that the appeal remain on hold until 2027.

We have significant concerns at the continued reliance on these outdated resource consents which contain inadequate protections to mitigate effects of the mining activities being undertaken. In addition, we are concerned that activities on the site are of a significantly different nature and scale to those which consent was granted for and that WRC have not been adequately monitoring or enforcing those conditions of consent that are in place.

Up until recently it was our understanding based on resource consent documentation lodged by TIL and correspondence with WRC that the relevant conditions of consent for mining operations were those attached to consents 100902, 100903, 100905, 100906, 100908, 100909, 100910, 111002, 122562, 122563, 122564, 122565, 122566, 122567, 122568 issued in 2006. We have recently become aware of a S127 application lodged in December 2012 and consents granted on 21st March 2013. The application sought to change the mining method from wet mining to a combination of dry and wet mining. It is the effects of dry mining that have resulted in significant effects on us and therefore the 2013 is relevant in managing the effects of this activity.

The RWWT is concerned that WRC have not been referencing or enforcing the most up to date consent documents and conditions. After reviewing this consent documentation including the application, full decision (including notification decision) it is clear that the character, intensity and scale of the operations that have been undertaken to date are significantly different to those described in both the AEE dated 2002 and 2013. The effects generated by activities to date are significantly greater than the current (expired) consents allow.

Condition 1(i) of Schedule Two- General Conditions imposed by the 2013 consent requires that:

The activity shall be carried out in general accordance with the application for this resource consent and the document titled "New Zealand Steel- Assessment of Environmental Effects, Taharoa Ironsand Mine, July 2002" and the application for variation of conditions titled "New Zealand Steel- Taharoa Ironsand Mine Assessment of Environmental Effects- Addendum, 9 January 2013" except where otherwise identified in subsequent conditions of this consent."

The 2013 resource consent application was processed on a non-notified basis with no affected parties identified. The effects of mining up to external boundaries were not addressed as this activity was not proposed.

It was proposed that:

"...the surrounding pine trees will act as an almost continuous buffer between the open mine areas and neighbouring properties."

"The proposed dry mining operation will create greater exposed areas than the wet mining operation. However, given the location of the site which is remote from neighbouring properties, and the rehabilitation management of the site, this is not considered to be a significant effect."

"In addition, the site will continue to be managed in accordance with the Landscape and Site Rehabilitation Management Plan.¹"

Photo 1 (attached) shows the northern part of the Central Block which adjoins Wetini and Kana whaanau whenua and the ridgeline four months after this consent was granted. The pine trees referred to within the consent remained at this time. The location of pine trees within the wider Central Block is shown in **image 1** (attached).

As you can see in **photo 2** taken on 6th January 2025 and **photo 3** (drone photo) taken in August 2024, these pine trees have since been removed, and land beneath the trees mined. Contrary to the description contained within the resource consent application, mining activities are now taking place in close proximity to neighbouring properties.

The aerial photos below from 2013 and 2024 (**image 1 and 2**) confirm that the entire buffer of pine trees contained within the Central Block and referred to in the resource consent application has now been removed.

The removal of this buffer and mining works that have occurred have significantly increased the off-site-effects of the activity. The effects of these works have been exacerbated by TIL's failure to undertake progressive rehabilitation in accordance with conditions of consent. This was confirmed by WRC during the resource consent process where an audit of monitoring records showed that between 2017-2023 only 7.06ha of rehabilitation had been undertaken of the required 70ha². Progressive rehabilitation as described in the AEE and required by conditions of consent has not been undertaken in accordance with the site rehabilitation plan. Ongoing operations at the Central mine site have not been carried out in general accordance with activities described within the 2002 or 2013 AEE.

² Section 42A Report Addendum, Mark Chrisp, dated 19 July 2024

It is clear to us from reading the 2013 application and consent that those works that have had the most significant impact on us and which we have raised numerous times with WRC should never have occurred. Had the pine tree buffer and setbacks been retained as was relied upon as mitigation within the 2013 application, we would not be experiencing the same level of impacts from mining operations.

It is clear that the conditions attached to these consents are outdated and insufficient to manage the effects of the mining operations. It is important however that while operating under these consents, those conditions that are in place including the general accordance condition are enforced by the Waikato Regional Council. It is our opinion that this has not been done.

We request that WRC action the following without delay:

- (a) Provide confirmation that it is the 2013 consent conditions that TIL is currently operating under for works within the Central and Southern Blocks;
- (b) Provide a written response to the concerns raised within this letter.

If you would have any questions or would like to discuss the concerns we have raised within this letter, please contact me on 021 0233 6992.

Nгаа mihi,

A handwritten signature in black ink, appearing to read 'M. Moore', is enclosed within a grey rectangular box.


 (on behalf of the Roy Wetini Whaanau Trust).



Photo 1: Wetini dwelling and landscape- 2013



Photo 2: Wetini dwelling and landscape- 6th January 2025



Photo 3: August 2024 (drone photo)



Photo 4: 30 November 2025

26 February 2026

Roy Wetini Whanau Trust

Via email

Private Bag 3038
Waikato Mail Centre
Hamilton 3240
New Zealand

waikatoregion.govt.nz
0800 800 401

Dear

Re: Complaint by Roy Wetini Whaanau Trust- Taharoa Ironsands Limited

Your letter dated 18th December 2025 sent to Patrick Lynch, has been passed on to me to respond to as your queries relate to the consenting and monitoring aspects of the Taharoa Ironsands site which falls within my area of responsibilities.

Your letter requests the following:

- (a) Confirmation that it is the 2013 consent conditions that Taharoa Ironsands Limited (TIL) is currently operating under for works within the Central and Southern Blocks; and
- (b) A written response to the concerns raised within your letter.

With respect to your first point, the site is operating under the consents that were granted in 2006 and 2011. Since 2011 there have been four consent variations to this suite of consents. The table below sets out each process associated with the consents that currently authorise the Central and Southern Block operations.

Application Title	Date Granted	Application No.	Process
Central and Southern application	2006	N/A	Consents required under the RMA
New coastal permits relating to the pipeline	2011	N/A	New coastal permits granted
Variation to multiple permits and new groundwater take consent	2013	N/A	Variations made to existing consents and new groundwater take consent
Variation to water permits	2016	APP136508	Variations made to water permits
Variation to permits to accommodate the Eastern Block extension	2018	APP138954	New consents and variations made to existing consents
Variation to permits to accommodate the Te Mania Block extension	2022	APP144534	New consents and variations made to existing consents

To answer your question, it is the 2022 consent variation process that incorporates the latest changes to the existing consents that authorise the Central and Southern Block operations. However, the main changes to the Central and Southern Block operations occurred during the 2013 consent process.

We understand that your concerns relate to the 2013 consent variation process and whether these changes to the conditions have been assessed by WRC and whether these have been complied with. WRC staff note that the wording of those conditions remain as per the 2013 process with subsequent variations not altering those specific conditions. Therefore, we can confirm that the changes made to conditions 1, 8 and 9 in Schedule 2, and condition 1 in Schedule 1 all made in 2013, is the correct wording of those conditions that Taharoa Ironsands Limited (TIL) is currently authorised to operate under for works within the Central and Southern Blocks.

A review of the 2013 Variation wording changes and the 2024/25 Compliance Report has identified that reference to the application for variation of conditions titled *"New Zealand Steel — Taharoa Ironsand Mine Assessment of Environmental Effects — Addendum, 9 January 2013"* within Condition 1 of Schedule 2 was erroneously left out. As was reference to an update within six months of the variation being granted in 2013 for condition 8 and 9 of Schedule 2. The change to Condition 1 Schedule 1 is correctly referenced in the Compliance Report.

It is acknowledged that some of the changes made to the consent conditions in 2013 were not updated to the Waikato Regional Council database correctly. It is this administrative error that resulted in the incorrect wording being incorporated into the latest compliance monitoring report. The database has now been corrected. WRC does not consider that this resulted in any errors with respect to the monitoring of these conditions given the conditions relating to updated documents have all been superseded by more recent updated documents. The issues with the general conditions (Condition 1 of each Schedule) raised within your letter are addressed below.

WRC staff understand that the other issues raised within your letter revolve around the new dry mining technique authorised via the 2013 variation process and whether the subsequent removal of pine trees and a ridgeline along with the rehabilitation form part of the scope that allow the Southern and Central Block operations to operate.

1. The removal of the pine trees along the Southern and Central Block boundary that occurred sometime after 2017;
2. The removal of the ridgeline that occurred sometime after 2017; and
3. Insufficient rehabilitation of the site since 2017.

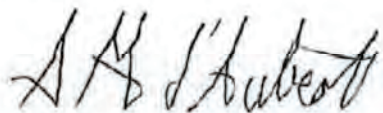
The consent conditions that authorise the Southern and Central Block operations and specifically Condition 1 to the Schedules provides for some flexibility within the overall scope of an application. WRC considers that the air discharge issues have been clarified and addressed through the 2024 re-consenting process via the requirement for a 200 metre setback of the operations from external neighbouring boundaries and other consent conditions requiring additional rehabilitation.

It is acknowledged that the re-consenting process remains subject to an appeal process and now a Fast Track application. Due to the operation of s124 of the RMA, at present TIL is entitled to operate under its existing consents. However, WRC considers that these matters have been or will be sufficiently addressed via those upcoming processes.

Whilst the requirement for a catch up on the specified rehabilitation has also been included in the consent conditions (that are subject to appeal) WRC monitoring staff have confirmed that all of the outstanding rehabilitation has been completed and in place as of mid 2025. It is noted that the plants are still in their infancy such that the improvements expected are some years away from having a material impact.

I trust that this letter addresses all the matters raised in your letter. Feel free to contact me if you require any further information or discussion.

Yours faithfully

A handwritten signature in black ink, appearing to read 'A M d'Aubert', written in a cursive style.

Ana Maria d'Aubert
Manager – Regional Consents
Resource Use Directorate

2nd April 2026

Waikato Regional Council
ATTN: Ana Maria d'Aubert
Manager- Regional Consents
Waikato Regional Council

By Email: [REDACTED]

Complaint by Roy Wetini Whaanau Trust- Taharoa Ironsands Limited

Dear Ana Maria,

Thank you for your response to the concerns raised in our letter dated 18th December 2025 received on 26th February 2026.

It is helpful to have confirmation that WRC is working to the most recent conditions of consent relevant for mining activities at the Central and Southern Block included in the S127 consent issued in 2013. We understand that incorrect reference to the 2004 consent by WRC at times is due to a failure to update the WRC database which has now been corrected.

Changes to the nature and location of mining activities at the Central Block

In regard to our concerns relating to past and ongoing mining activities and specifically:

- *The removal of pine trees within the northern and eastern parts of the site.*
- *The location of mining activities in close proximity to external boundaries.*
- *Impacts on the ridgeline adjoining our whaanau whenua.*

Our understanding from your response regarding enforcement of Condition 1(i) of Schedule Two-General Conditions is that:

- WRC is familiar with the contents of the AEE dated July 2002 and addendum dated January 2013 including the activities and mitigation measures described.
- WRC is aware that the consent holder has and continues to undertake works which are not as described within this AEE.

Specifically:

- *The consent holder has removed the pine trees which were to act as a continuous buffer between the open mine areas and neighbouring properties.*
- *Contrary to the description within the resource consent application which describes mining operations as being "remote from neighbouring properties", mining activities have and continue to be undertaken in close proximity to neighbouring properties. This includes mining of land beneath the (now removed) pine tree buffer and land located between the removed buffer and external boundaries (including a significant portion of the ridgeline adjoining Wetini whaanau land).*

- WRC is aware of these discrepancies and has allowed the consent holder to undertake these works on the basis that Condition 1 provides for *"some flexibility within the overall scope of an application."*

We understand that the wording of Condition 1 (general accordance condition) allows for some flexibility, however, where the consent holder sought to change the nature and location of mining activities in a way that resulted in the removal of mitigation measures included to reduce off-site effects, we would have expected WRC to require the consent holder to submit a S127 application (change to conditions) with an updated AEE to address the actual and potential effects of proposed changes on the environment including consideration of affected parties.

As this process was not followed, at no time have the effects of these significant changes to the mining activities been considered or addressed. We remain concerned at the consent holder's failure to undertake works in accordance with the AEE as required by the general accordance condition and WRC's failure to enforce this condition of consent.

Air Discharge Effects

You have confirmed WRC's position that air discharge issues have been clarified and addressed through the 2024 re-consenting process via the requirement for a 200m setback of the operations from external boundaries.

The Roy Wetini Whaanau Trust is fully supportive of the 2024 decision and conditions contained within this consent including setbacks from external boundaries and agrees that conditions of this consent would significantly mitigate effects of mining works including those on air-quality.

However, as you have mentioned, this consent is subject to an appeal, and TIL have in addition progressed a Fast track application. While WRC are enabling TIL to continue operating under S124(2)(e) RMA air discharge issues remain a concern to us particularly given the nature and location of the works with these being undertaken in closer proximity to external boundaries than permitted by the existing (expired) consents and within the setbacks imposed by the 2024 consent. The effects of these works on air quality for those adjoining and beyond (including Tahaaroa village) have been exacerbated due to TIL's failure to undertake progressive rehabilitation in line with conditions of consent.

Rehabilitation

In regard to breaches of conditions of consent relating to rehabilitation, you have confirmed that 'catch up' rehabilitation has been completed and was in place as of mid-2025. As detailed in the S42A Addendum referred to in our letter, this catch-up rehabilitation covers an area of 70ha².

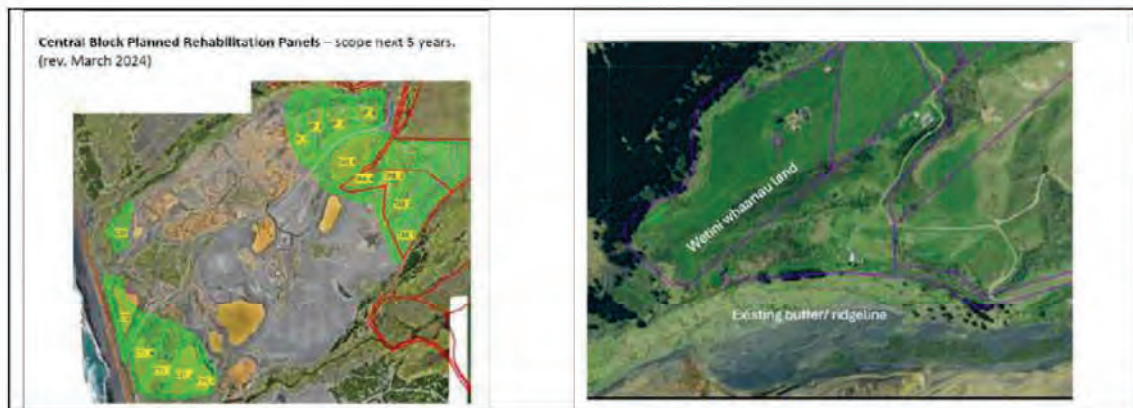
While we overlook much of the Central mine site from our whenua, we have not seen any signs of rehabilitation to date. Moreover, when we drove through the mine site to the lake for a waananga recently, there were no visible signs of rehabilitation. If you could please confirm the total area and location of the planting on a plan and date that this was last inspected by WRC that would be appreciated.

Site Rehabilitation Plan

On 18th February, I sent a further email to Jack Blunden and Patrick Lynch expressing concerns regarding the Site Rehabilitation Plan which was submitted to WRC by TIL in July 2024 which I have not received a response to.

As described in this email, the site Rehabilitation Plan is significantly different to that lodged previously by the consent holder and results in the following significant changes:

- *The SRP accepted by WRC removes the consent holder's commitment to rehabilitate 10-15ha annually.*
- *The SRP describes activities that would breach Condition 1(i) of Schedule Two as the activity is not in general accordance with the AEE dated July 2002 or January 2013.*
- *Details contained within the SRP are vague, non-committal and provide little detail as to what ongoing and final rehabilitation works are proposed by TIL. Insufficient details are provided to confirm that progressive rehabilitation is proposed/ will be undertaken in line with the existing consent.*
- *Section 9.0 (Approximate timeframes for rehabilitation) describes rehabilitation of land outside of the consent area (TA09 Puketapu and Wetini (Eastern) Blocks). Mining of this land is undertaken under a separate consent (RM200031) and rehabilitation of this land does not address the effects of mining activities within the Central and Southern Blocks.*
- *The SRP shows mining of a significant portion of a ridgeline (shown as IP1-4 in the below plan). We have highlighted the importance of retention of this ridgeline numerous times as a submitter during the resource consent process and in correspondence to WRC. Mining of this ridgeline would breach the general accordance condition. We consider that the effects of mining this ridgeline on ourselves and other adjoining landowners would be devastating including effects on our amenity, dust effects and our ability to continue to connect to our ancestral land.*



We would appreciate a response from WRC regarding our concerns in relation to the Site Rehabilitation Plan and further details requested regarding rehabilitation referred to in your letter.

At this stage, and for the reasons outlined in this letter, trustees remain to have concerns about ongoing mining activities within the Central and Southern Blocks. Depending on WRC's position and any further information received, it may be beneficial to meet either online or in person to discuss further.

Ngaa mihi,

(on behalf of the Roy Wetini Whaanau Trust).

13th April 2026

Waikato Regional Council
ATTN: Ana Maria d'Aubert
Manager- Regional Consents
Waikato Regional Council

By Email: [REDACTED]

Complaint by Roy Wetini Whaanau Trust- Taharoa Ironsands Limited

Dear Ana Maria,

Further to our previous letters dated 13th April 2026 and 18th December 2025, our most recent visit to Tahaaroa has left us with significant additional concerns in regard to effects of ongoing mining activities at the Central Block.

We were advised by a reliable source that TIL is preparing to mine the ridgeline behind the Kana whare and that this is intended to occur in the next month. The following evidence supports this:

- *The power poles previously located on the western side of the remaining ridgeline providing power to the Northern Block have been removed to allow for mining of the ridgeline.*
- *A new track has been cut behind the Kana dwelling to enable relocation of power poles/ lines.*
- *A survey peg has been placed within our shared fence line with TIL which we were informed will be the location of the new power pole/s.*



Photo 1: New track cut out for the powerline relocation



Photo 2: Survey peg for powerline relocation



Photo 3: Ridgeline as of 5th April 2026



Photo 4: Saltation that has occurred from mining of Central Block ridgeline

Some of the impacts of mining the western part of this ridgeline are visible within photos 3 and 4. These effects were described within our previous letter. Photo 4 shows the saltation which has occurred within the western part of the ridgeline with sand moving down what remains of ridgeline towards the stream and wetlands below.

While the Kana dwelling located at the base of this ridgeline will bear the brunt of much of the effects of mining of the remaining ridgeline, as expressed previously we are extremely concerned about the impact on our whenua, our amenity and our ability to continue to connect to our ancestral lands. In addition to the central block, we adjoin the northern block and therefore we are impacted by cumulative effects of all adjoining works (including Pit 1 to the west of us).

We are concerned that mining of this ridgeline will result in those dwellings to the north becoming uninhabitable. We ask that the Waikato Regional Council **urgently** contact Taharoa Ironsands Limited to advise them that mining of this ridgeline would result in a breach of existing conditions of consent.

It is our expectation that should TIL proceed with mining of this ridgeline, WRC will proceed with enforcement action. Should WRC fail to do so the Roy Wetini Whaanau Trust will hold WRC liable for any impacts on ourselves and our whenua.

Ngaa mihi,

[REDACTED] (on behalf of the Roy Wetini Whaanau Trust).

Attachment 6: Fast-track Application Correspondence with TIL



Taharoa Ironsands Ltd

21 May 2025

BY EMAIL: [REDACTED]

[REDACTED] and Whānau
[REDACTED]

Dear [REDACTED] Wetini Whānau

Taharoa Ironsands Limited – Fast-track Approvals Act 2024 applications

1. As you know, Taharoa Ironsands Limited (**TIL**) owns and operates the Taharoa Ironsand Mine which has been in operation since 1973.
2. The Mine is divided into blocks known as the Northern, Central and Southern Block which are all located on Taharoa C Block, as well as the Eastern Blocks and the Te Mania Extension which are located on adjoining land.
3. TIL needs to replace its resource consents relating to the Central and Southern Blocks to continue operating the existing Mine and to enable expansion of the Mine in the future. TIL sought to do so by making an application in 2020 under the standard resource consenting process under the Resource Management Act 1991 (**RMA**). The consenting process under the RMA was lengthy and TIL was not satisfied with the decision, which led it to appeal the decision to the Environment Court on 12 December 2024.
4. Since the appeal was filed, the Fast-track Approvals Act 2024 (**FTAA**) has been enacted. The FTAA establishes a fast-track environmental approvals regime for projects of national and regional significance in New Zealand.
5. The reconsenting of the Central and Southern Blocks of the Mine has been recognised by the Government as having regional and national significance and has been directly referred to utilise the Fast-Track approval process. The FTAA therefore provides an alternative, and suitable, consenting pathway for TIL to apply for the resource consenting process for the Central and Southern Blocks. New mining of the Northern Block has also been directly referred by the Government to utilise the Fast-track process on account of its regional and national significance.
6. We are now preparing our substantive applications for both projects which will be considered under the FTAA. We are intending to file the applications with the Environmental Protection Agency in June/July 2025. Enviser is managing the preparation of the applications on behalf of TIL with input from a range of technical consultants, including Grant Eccles (planner) of Tonkin & Taylor Limited. Tonkin & Taylor has provided a high-level summary of what will be sought in each application in **Appendix A**.
7. We have previously engaged with you in respect of our application under the RMA for the Central and Southern Blocks, and you participated in the hearing of that application. TIL understands your view in respect of the Mine and the consenting of the Central and Southern Blocks from that process. However, we are writing to provide you with an opportunity to provide further written feedback on the FTAA applications, while they are being prepared.

8. If you would like to provide written feedback, please let us know using the following email address: [REDACTED] We would appreciate that written feedback is provided by 10 June 2025.

Yours faithfully



Wayne Coffey
Managing Director and CEO of Taharoa Ironsands Limited

Appendix A

Taharoa Ironsands Mine – Project summary for pre-application consultation

- Northern Block Mining Project
- Central and Southern Block Mining Project

1 Overview

Taharoa Ironsands Limited (TIL) operate an ironsand mine at Taharoa, on the West Coast of the North Island, approximately 8 km south of Kawhia Harbour. The Taharoa Mine has been in operation since 1973 (owned by New Zealand Steel until 2017). The mine site covers an area of approximately 1,300 hectares, primarily on Māori land legally described as the Taharoa C Block and the part of the coastal marine area (CMA) legally defined as Port Taharoa (**mine**).

For the purposes of mining activity, Taharoa C Block is divided into blocks. As shown on the attached plan:

- (a) the area of the site to the north of the Mitiwai Stream is known as the Northern Block.
- (b) the area of the site between the Mitiwai Stream and the Wainui Stream is known as the Central Block; and
- (c) the area of the site to the south of the Wainui Stream is known as the Southern Block.

The Central and Southern Blocks are currently operated under a suite of resource consents granted in 2006.¹ Mining activity has not historically occurred in the Northern Block.

TIL is now preparing applications for the necessary resource consents, wildlife permits and archaeological authorities under the Fast-track Approvals Act 2024 (FTAA) to authorise:

- the extraction of sand (and associated activities) on the Northern Block (known as the Northern Block Mining Project); and
- the continuation of sand extraction (and associated activities which support the entire mine, including its export operation) on the Central and Southern Blocks and in the CMA (known as the Central and Southern Block Mining Project).

The following describes the proposed mining and associated works which are subject to the applications, details the resource consents and approvals sought and provides a high-level summary of the potential effects on the environment of each project at this stage. As the applications are currently being prepared, this information is based on the work completed as of 01 May 2025, and is subject to change.

¹ TIL also hold separate resource consents for mining of (i) the “Eastern Block” granted in 2018 (mining now completed and rehabilitation underway), and (ii) the “Te Mania Extension” adjoining the Eastern Block granted in 2022 (mining yet to commence), and (iii) a small area in the Northern Block known as “Pit 1” granted in late 2024 (mining currently in progress). Mining at these locations relies on the water take resource consents and the coastal permits granted for the Central and Southern Blocks.

2 Description of proposed works

TIL propose to mine ironsand throughout the Northern, Central and Southern Blocks excluding areas where mining restrictions will apply. The areas where mining activity will not take place are within 100 m of Mean High Water Springs, 30 m of perennial water bodies (Mitiwai Stream, Wainui Stream and Lake Taharoa), and within already identified urupa and archaeological re-interment areas on the mine. Other mining exclusion areas may be identified as part of the completion of technical assessments that are currently underway. Any additional mining exclusion areas that are identified by the technical assessments will be included in the substantive FTAA applications.

Whilst the process to extract, process and export the ironsand can and does vary depending on the nature of the deposit being mined at the time, it follows the same broad steps. These activities, which are sought to be authorised as part of the Central and Southern Block Project, include:

1. **Vegetation, topsoil and overburden removal, including harvesting of trees with commercial value (pines).** Useful native species are removed prior to stripping of topsoil for use in the eco-sourced nursery on site. Topsoil is stockpiled on-site for use in future rehabilitation activities.
2. **Extraction and processing of Ironsand.** Raw Ironsand is extracted using various methods and equipment depending on ground conditions. In upper layers, standard earthmoving machinery such as excavators, bulldozers, and trucks are used to collect the ironsand and deposit it into a Dry Mining Unit (DMU). The DMU mixes the ironsand with water to form a slurry, which is then pumped to a treatment plant for titanomagnetite extraction.
3. During this process, groundwater and surface water may enter the active excavation area. To maintain dry working conditions, this water may be pumped out as required. However, as mining progresses to deeper layers, maintaining a dry pit may become impractical. In such cases, a cutter-suction dredge is used in a water-filled pond. The dredge floats on the water and uses a submerged dredge head to cut, fluidise, and pump the Ironsand slurry through a pipeline to the treatment plant. The dredge is capable of operating at depths of 8 to 15 meters below the pond surface. In some instances, a long-reach excavator may also be used to extract material from within the pond.
4. **Processing.** The extracted ironsand is transported to a centralised processing plant where it is concentrated and processed. The ironsand is refined using screening and gravity separation. The ironsand is mixed into a slurry and pumped through a seabed pipeline to a bulk carrier ship moored at the Port of Taharoa. The export pipelines run from the processing and storage facility located on land to a Single Buoy Mooring (SBM), located approximately 3.5 km offshore.
5. **Ship loading and dewatering.** Bulk carrier ships moor at the SBM to receive the ironsand in slurry form from the export pipelines. Each ship contains dewatering equipment and the resulting freshwater, containing residual fine suspended material (inert, inorganic geological material) that is removed from the ironsand slurry, is discharged from the ship to the sea. The discharge forms a buoyant plume that floats on the seawater surface before dispersal and dilution. Ship loading operations are currently undertaken approximately 20 times per year and will increase in frequency in future as production increases up to a projected maximum of 35 times per year. Each ship loading activity takes approximately 90 hours (of pumping time) however weather conditions have an influence on loading timeframes.

6. **Tailings disposal and rehabilitation of mined areas.** The tailings (ferrous and non-ferrous sand, silts and clays) which are separated from the exportable product are pumped as a slurry to tailings disposal areas. The discharged slurry dewatered by gravity, with the drainage water collected and directed into a settlement pond or ponds. Once the tailings have dewatered, mechanical plant (excavators and dozers) redistribute the material to form the grade and levels required by the rehabilitation plan for that area. Following this the land may be stabilised, top soiled and replanted.

To operate the mine, the process requires the abstraction of water from the Wainui Stream via a constructed dam incorporating a fish pass, and the discharge of stormwater to the Wainui Stream and the discharge of process water to settling ponds. Excess stormwater and process water is discharged to the CMA via the ship loading pipelines.

The activities sought to be authorised as part of the Northern Block Mining Project include (but are not limited to):

- (a) vegetation, topsoil and overburden removal, and excavation and processing of ironsand above and below the water table (as above);
- (b) the transportation of that product via temporary pipelines to the established processing plant on the Central and Southern Block;
- (c) processing (as above);
- (d) discharge of process water to land; and
- (e) tailing disposal and rehabilitation of mined areas (as above).

The Northern Block Mining Project will rely on / be supported by the processing infrastructure located on the Central and Southern Blocks. It will also rely on / be supported by the consents being sought for the Central and Southern Block to take and use water from the Wainui Stream, discharge of stormwater to the Wainui Stream and the CMA, discharge of process water to the CMA and transport of processed product from the processing facility through the ship-loading pipelines to the CMA. No changes are being proposed to the existing water take limits and discharge limits to facilitate mining of the Northern Block.

3 Approvals sought

3.1 Resource Management Act 1991

A summary of the resource consents that are required for the Northern, Central and Southern Blocks is set out below.

3.1.1 Resource consents required for the Northern Block

National Environmental Standard for Freshwater 2020 – consents to clear vegetation and undertake earthworks within and within 10m of a natural inland wetland. Consents are also required to take, use, dam, or divert water within and within 100 m of a natural inland wetland and to discharge water within and within 100 m of a natural inland wetland.

National Environmental Standard for Commercial Forestry 2017 – consent to harvest pine trees within Class 8e land.

Operative Waikato Regional Plan – consents for soil disturbance and vegetation clearance activities, diversion and taking of groundwater and surface of water associated with mining above and below the water table, discharge of a contaminant to land or water (process water and placement of tailings) and for overburden disposal to land.

Additionally, resource consent is required under the Operative Waitomo District Plan for the potential disturbance of archaeological sites recorded in the Plan - this consent applies to the Northern Block only given that mining has occurred since the early 1970's on the Central and Southern Blocks.

3.1.2 Resource consents required for the Central and Southern Blocks

The resource consents set out above are also required for the Central and Southern Blocks.² In addition, the following resource consents are required for the Central and Southern Blocks Project:

Operative Waikato Regional Plan – consents for the damming, diversion and taking of surface water and groundwater, for stream bed disturbance, and for the discharge of stormwater to surface water.

Operative and Proposed Waikato Regional Coastal Plans – consents for the use and occupation of the Coastal Marine Area by the export pipelines and the SBM, for discharges to and depositions in the CMA from shiploading activities, and for the discharge of stormwater from the export pipelines.

3.2 Wildlife Act 1953

A wildlife permit will be required to manage lizards if they are identified prior to vegetation removal or ground disturbance works.

3.3 Heritage New Zealand Pouhere Taonga Act 2014

Archaeological authorities will be sought due to the potential for currently undiscovered archaeological features to be disturbed by mining activities (excluding urupa and archaeological areas reserved from mining which will not be disturbed).

4 Benefits of the Projects

The continuation of the mining activity on the Taharoa C Block that will be facilitated by the approvals sought under the FTAA will generate significant regional and national benefits. The Central and Southern Block Mining Project and Northern Block Project will directly contribute billions to the New Zealand economy (through employment, income for landowners, business for regional supplies and the payment of taxes).

The mine provides significant employment opportunities for the community, particularly local Māori. Over 82% of income earned by local Ngāti Mahuta comes from employment at the mine. TIL has a core workforce of 170-80 people but employs upwards of 300 staff and contractors.

TIL relies on locally sourced goods and services including the supply of electricity and services from surrounding areas including Kawhia, Te Kuiti, Otorohanga, Te Awamutu and Hamilton. TIL also relies on specialist sub-contractor support including the maintenance and management of specialised mine machinery and equipment. The support TIL relies on (and will continue to rely on) from

² Excluding the resource consent required for archaeological site disturbance.

surrounding centres for the Northern Block Project and Central and Southern Block Mining Project will inject billions into the local economy over the life of the consents sought for the Project.

The mine also provides essential benefits to the local Taharoa Village which was established around the mine and exists today because of the substantial financial contribution the mine makes every year.

5 Summary of potential adverse effects on the environment

The following high-level summary of effects on the environment is based on technical assessments previously completed in relation to mining of the Central and Southern blocks. These assessments are currently being updated, and additional assessments are being completed for mining of the Northern Block. A full assessment of effects supported by technical assessments will be included in the applications for the Northern and Central/Southern Blocks respectively.

5.1 Effects common to the Northern, Central and Southern Blocks

5.1.1 Effects on terrestrial ecology (including bats, birds, lizards)

Disturbance from mining activities has the potential to have adverse effects on wetland and grassland bird species. The loss of existing grassland due to the mining activity may also result in potential injury or death of various threatened native skink present in low numbers in the grassland. The overall level of effect on terrestrial ecology has been assessed as being **low** with the provision of an over-arching Environmental Management Plan (EMP), including an Avifauna Management Plan, Bat Management Plan and a Lizard Management Plan, and imposition of appropriate conditions such as a requirement for there to be a 30 m planting buffer around all natural water bodies. Subject to the imposition of conditions, the overall level of effects on terrestrial ecology has been assessed as **minor**.

5.1.2 Effects of mining below the water table

When mining activity interacts with groundwater there may be the potential for adverse effects on surface freshwater bodies if there is a hydraulic connection between the groundwater and surface water. This connection will be carefully monitored. Any adverse effects on the primary freshwater bodies on the site (the Mitiwai Stream and the Wainui Stream) can be avoided and mitigated through consent conditions including for example, requirements to maintain a minimum flow within the streams.

5.1.3 Effects of discharge to land

The discharge of tailings and surplus process water to land has the potential to cause adverse effects on landform, groundwater and nearby waterways. The tailings material is re-formed as close as practicable to the original landform. The discharge of surplus process water does not result in contamination of groundwater due to the natural filtering provided by the sandy ground conditions. Overall, the adverse effects of discharges to land have been assessed as **less than minor**.

5.1.4 Land disturbance effects

The mining operation is located in a high-risk erosion area and the mining and stockpiling of ironsand has the potential to result in adverse effects on land stability. Given that the mine has a good operational history with no erosion issues requiring mitigation, a rehabilitation process and

revegetation plan is followed for disturbed areas, and perennial waterbody mining setbacks are imposed, any adverse effects can be considered **negligible**.

5.1.5 Archaeological effects

Taharoa C Block is and has always been Māori land which means that there is elevated potential for accidental discovery of koi iwi and other taonga in the dune environment of the area. Ngāti Mahuta derived tikanga and protocols apply when discoveries of koiwi and taonga occur in the Taharoa dune environment as a result of mining activity, and that tikanga/protocol is reflected in existing and proposed consent conditions. Defined urupā are located within the dune system where accidentally discovered koiwi are interred with appropriate tikanga being observed. A buffer in which no mining occurs is observed around each urupā.

All of these measures and practices will continue and mitigate the potential adverse effects in relation to archaeology to **less than minor** levels.

5.1.6 Cultural effects

In considering cultural effects, it is important to note the cultural benefits the ongoing operation of the mine has for Ngati Mahuta as tangata whenua. These benefits include employment benefits, royalties, and support for the local community. Ngati Mahuta, through the Taharoa C Block Incorporation, 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 Ngati Mahuta whanau. The local employment opportunity generated by the mine has allowed the local community to retain members of the community who may have otherwise moved away to seek employment elsewhere and lost their connection to the land.

TIL understand the views of the respective Taharoa Marae and Te Runanga in relation to the potential cultural effects of the Central and Southern Block Project. In summary, at a high-level:

The damming of the Wainui Stream has the potential to have adverse effects on the health of Lake Taharoa and its indigenous fishery, 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 the presence of indigenous fish species in the stream and lake upstream of the dam continues.

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. 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 of vegetation). In that regard, TIL has developed and is implementing an overall Site Rehabilitation Plan and updated Conceptual Site Closure Plan in place to be implemented in the event that the mine closes in the future.

TIL propose to consult with the respective Taharoa 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 monthly monitoring records to communicate data to mana whenua and the community.

5.1.7 Air Quality Effects

The mine is located in an isolated location subject to extreme westerly winds. In this environment, there is potential for wind-blown sand from the mine site to generate adverse effects on adjoining and adjacent sites to the mine, including in Taharoa Village. TIL implement a range of avoidance and mitigation techniques to control such emissions including the erection of fencing to trap sand particles, placing ground cover (for example, coconut matting) on exposed areas, using mobile and automated fixed watering systems on internal site roads, enforcing vehicle speed limits, and progressively rehabilitating mined out areas. These measures mean that the mine site can operate in accordance with the relevant permitted activity rule of the Waikato Regional Plan with regards to air quality. TIL proposes to implement a Dust Management Plan to manage the implementation of these dust prevention mechanisms. Although there remains the potential for off-site discharges of dust due to the coastal environment, these discharges are highly unlikely to result in adverse effects to human health. Acoustic Effects

The mining activities have the potential to have adverse noise effects on key sensitive receptors on sites adjoining the Northern Block (1891 Taharoa Road, 1891A Taharoa Road, Te Kōraha Marae and 25 Rotopuhoe Road). However, these receptors are located several hundred metres from where mining will occur on the Northern Block and given this separation distance, it is expected that the works will be able to be managed to comply with the Waitomo District Plan daytime and nighttime noise limits. As a result, any potential adverse effects from noise from mining on the Northern Block on sensitive receivers is expected to be **less than minor**.

Mining on the Central and Southern Blocks has been continuous since the 1970s and benefits from existing use rights with respect to noise levels and associated acoustic effects. Notwithstanding this, noise levels are expected to be compliant with District Plan noise limits. TIL will continue to adopt the best practicable option to ensure that the emission of noise from these blocks does not exceed a reasonable level for any nearby sensitive receptors.

5.2 Effects relating to the Central and Southern Blocks only

5.2.1 Effects of damming Wainui Stream

Authorisation of the dam in the Wainui Stream will result in a similar water regime to what is currently present. Fish passage will be provided for via the monitoring and maintenance of a fish pass which achieves the intended purpose of allowing grey mullet and other targeted species to be able to navigate upstream to Lake Taharoa. The downstream migration of juvenile native fish can be adequately addressed through consent conditions which include the retention of a minimum flow within the fish pass and downstream of the dam, as well as monitoring of fish pass performance. As a result, the effects of the dam on fish passage has been assessed as **negligible**.

5.2.2 Effects on water quantity

Water is extracted from the impounded section of the Wainui Stream for mining and shiploading processes. Separate water take consents are held for the mining and shiploading takes and the consents cannot be exercised at the same time. The mine is currently operating within the historically consented limits for water abstraction and no further water quantity is required for the continued operation of the mine. The Wainui Stream catchment is not over-allocated and there are

no permits held by any other party to take water from the stream. As a result, adverse water quantity effects are avoided.

5.2.3 Effects of water take on marginal wetlands

The proposed water takes have the potential to have adverse effects on marginal wetlands around the edges of Lake Taharoa. Noting that the wetlands have acclimated to the lake levels that have been experienced since the installation of the dam in the Wainui Stream in the early 1970's, the magnitude of these effects has been assessed as **low** given that the water takes will be operated in a similar manner to what has been historically occurred at the mine. Importantly, TIL is proposing to retain existing conditions that require water takes to cease if the lake levels reach a certain minimum point. Conditions will also be proposed that require ongoing monitoring of the lake margin wetlands and management responses to be implemented if the lake level remains low for an extended period and the wetlands show signs of stress (other than that caused by natural seasonal conditions).

5.2.4 Effects on benthic fauna

The proposed ship-loading infrastructure including pipelines on the seabed and the tethering mechanism for the SBM will continue to occupy part of the seabed and impact on a small amount of available subtidal sandflat habitat. Given the small percentage of the available subtidal sandflat habitat this represents, this is assessed as having a low magnitude of effect on benthic ecology. The effects of constructing the pipeline have also been assessed as being **low**.

5.2.5 Effects on fish and seafood species

The discharge from the ship loading process has the potential to have adverse effects on existing habitat for fish and seafood species. Given the relatively infrequent and short-term nature of the discharge and the highly mobile nature of fish species the potential adverse effects are assessed as **negligible**. The presence of green lipped mussels in the area of the discharge indicates that ongoing ship loading discharges do not inhibit mussel colonisation and has a **negligible** effect on seafood resource species.

5.2.6 Effects on marine mammals

A number of marine mammal species can be present in the wider marine area around Port Taharoa such as Māui dolphins, common dolphins, southern right whales and Orca/killer whales. Given the low level of risk posed by the ship loading operation and the fact that it has been occurring in the vicinity since the early 1970's, the overall risk of adverse effects for marine mammals is assessed as **negligible**. Nevertheless, to recognise the sensitivity of the marine mammals that traverse the area, TIL propose conditions that require an underwater noise survey to be undertaken if 35 ship visits occur in a 12 month period, in order to inform best practice underwater noise measures.

5.2.7 Effects on coastal processes

TIL seeks to continue the ability to discharge up to 75,000m³ per day of ship loading water, including freshwater and fine sediment, up to a maximum of 7,500,000m³ per year. As a result of dilution and dispersion of the sediment plume provided by oceanic conditions, the effect of this discharge on coastal processes has been assessed as being **less than minor**.

5.2.8 Effects of discharges in the Coastal Marine Area (CMA)

The potential adverse effects of the sediment discharge from the ship-loading events have been addressed above. The discharge includes some trace levels of naturally occurring contaminants in the ironsand that is pumped in slurry form into the ship. Because of the extremely low levels of the naturally occurring contaminants, and the dilution provided by the sea water, the discharge will not result in any measurable toxicity effect on benthic fauna.

TIL is seeking consent to continue to discharge excess process water and stormwater to the CMA at a rate of 32,000m³/day. This discharge occurs infrequently and when there is no suitable alternative to provide for the discharge on land - primarily at times of prolonged heavy rainfall. The potential ecological effects from the process water/stormwater discharge are likely to be even less than those of the ship loading discharge which were assessed to be less than minor. Correspondingly, no further actions to avoid, remedy or mitigate potential effects from the process wastewater and stormwater discharges are required apart from monitoring of the discharge quality and composition.

5.2.9 Effects on navigation safety

The continued ship movements to and from the Port of Taharoa and the occupation of the CMA by ship loading infrastructure have the potential to have adverse effects on navigational safety of other users of the CMA. However, the use of this area for recreational watercraft and commercial vessels is infrequent and the movement of ironsand export ships has been established in the area since the early 1970's. No more than one ship can access the mooring buoy at one time. Furthermore, the Port of Taharoa is operated in compliance with the New Zealand Port and Harbour Marine Safety Code, the Harbourmaster previously had no objection to the continued activity and several improvements have been implemented since the granting of the now expired resource consents in 2002. For these reasons, potential adverse effects on navigation safety have been assessed as **less than minor**.

12th June 2025

Taharoa Ironsands Limited

Wayne Coffey: email: [REDACTED]

Roy Wetini Whaanau Trust Response to Consultation Document: Fast Track Applications for the Central, Southern and Northern Blocks

Teena koe Wayne,

We write in response to your consultation letter sent on behalf of TIL in regard to TIL's intention to lodge applications under the Fast Track Approvals Act for the Central, Southern and Northern Blocks.

Central and Southern Blocks

Regarding the Central and Southern Blocks, paragraph 7 of your letter, incorrectly states "*We have previously engaged with you in respect of our application under the RMA for the Central and Southern Blocks...*"

As you know, the Roy Wetini Whaanau Trust was not engaged or consulted regarding the resource consent applications for the Central and Southern Blocks. This application was lodged with the Waikato Regional Council in 2020. At the time of lodgement and up until 2023, this application also sought consent for mining of the Northern Block. Despite adjoining both the Northern and Southern blocks, we were notified of this application 3 years after lodgement in June 2023 at which time we contacted WRC seeking further information. It was not TIL that informed us of this application.

Since June 2023, we have since spent significant time and resources in regard to this resource consent process including numerous discussions, emails to WRC many of which were with the purpose of seeking further information, preparation and lodgement of a submission, reviewing numerous documents and statements of evidence, responding to requests from the hearings coordinator, attending hui, attendance at the hearing held in Te Kuiti and presenting evidence along with other submitters at Aaruka Marae.

The Roy Wetini Whaanau Trust detailed our concerns regarding the existing and proposed activities within our statements of evidence at the resource consent hearing for the Central and Southern Block. As you were not in attendance at the time we presented our statements I have attached these for your information (**Attachments 1 and 2**).

Based on the most recent and very brief outline of works and AEE for Fast Track applications we can confirm TIL has not addressed our concerns.

We strongly support the Commissioner's decision dated 21st November 2024 (**Attachment 3**) and were disappointed at TIL's decision to appeal and subsequently the request to place the appeal on hold in order to pursue applications via Fast track process. In our view, the conditions of consent would sufficiently mitigate the effects of the mining activities to a level that we are comfortable with. The attached letter sent to the Environment Court dated 26th February 2025 provides our view on TIL's decision to appeal/ pursue fast track process in greater detail (see **Attachment 4**).

We support the conditions contained within the decision issued in November and request that any Fast-Track application incorporate these conditions (see **Attachment 5**).

In particular, the following mitigation measures would address a number of our concerns in regard to mining activities at the Central and Southern Blocks:

- Setbacks as detailed within condition 2 including (but not limited to):

- 100m from the Mitiwai Stream;
 - 200m from any third-party properties adjoining the Consent Area;
 - 100m from all natural inland wetlands within the Consent Area.
- Incorporation of a structured framework to mitigate cultural effects of the consent including providing for kaitiakitanga and maatauranga Maaori.
 - Inclusion of conditions of consent that highlight the importance of rehabilitation in managing air quality effects which are a priority for us given our close proximity to the mine.
 - A requirement for the payment of a Bond.
 - Visibility on and mana whenua input into the Site Rehabilitation Plan and Conceptual Site Closure Plan.
 - Greater visibility to ensure TIL achieve ongoing compliance with consent conditions (particularly rehabilitation) through establishment of a website which can be accessed by mana whenua.

Please see the attached Statements of Evidence, the decision and conditions of consent for a full outline of our concerns and measures sought to address these concerns (**Attachments 1-5**).

Northern Block

In regard to activities within the Northern Block- TIL hold an existing consent for Northern Block- Pit 1 and seek to obtain consent via the Fast Track process to mine the remainder of the Northern Block.

Northern Block- Pit 1

The first time we met with yourself, and Greg Martin was with the intention of consulting on the Northern Block- Pit 1 application on 6th March 2024.

At this meeting we expressed our concerns in regard to generation of dust which we consistently find on surfaces inside our dwelling and noise from the activities at the Central Block as we had the previous night had a sleepless night due to excessive noise with mining of the ridgeline within the Central Block. When TIL failed to act on our concerns in regard to existing activities, we sent the attached letter to WRC and WDC on 27th March 2024 (**Attachment 6**).

Following the meeting, we sent you a letter (see **Attachment 7**) seeking further information so we could better understand the Northern Block- Pit 1 proposal. TIL did not respond to our request for further information.

Despite this, the WRC granted the consent for Northern Block- Pit 1 on a non-notified basis. The consent that was granted was significantly different than the details we were provided at the meeting held on 6th March. Of particular relevance, the consent term was extended from 12 months to 5 years.

We are extremely disappointed by the decision for a number of reasons and we expressed our concerns in a letter sent to the Waikato Regional Council on 13th January 2025 (**Attachment 8**).

While consents have been granted by the Waikato Regional Council and Waitomo District Council to mine within Northern Block- Pit 1, we note that no assessment was included to consider the cumulative effects of the works. It appears this is because the consents for the Central and Southern Blocks had not yet been granted.

We note that the high-level information included within the consultation document does not address cumulative effects. It is our expectation that any AEE submitted to support a Fast Track application would include a detailed assessment of cumulative effects which would include Northern Block- Pit 1, Central, Southern, Northern Block and where relevant Te Mania and Eastern Block works. As we are located between the Central and Northern Blocks and we adjoin Pit- 1, we would experience effects (particularly noise, dust and amenity) generated from all of these land parcels.

Northern Block- Fast Track application

Within the consultation document, details of proposed operations within the Northern Block and an assessment of the effects of the works are extremely brief. It appears that TIL propose to mine up to external boundaries and that this would include the ridgelines to the north of us (within the Northern Block) as well as to the south (Central Block).

Proposed conditions of consent have not been included and there is little detail in regard to any mitigation measures proposed. No technical documents have been supplied to support statements and conclusions made within the AEE.

As an example, it is concluded within the AEE that "...any potential adverse effects from noise from mining on the Northern Block on sensitive receivers is expected to be less than minor." This is based on receptors being located "several hundred metres from where mining will occur on the Northern Block". Our existing dwelling is located only 65 metres from the external boundary adjoining the Northern Block. It appears that TIL do not propose a setback from external boundaries. Based on this we cannot see how adverse effects from noise are expected to be less than minor.

No acoustic report has been included to confirm the anticipated noise level received by sensitive receptors from activities within the Northern Block nor has an assessment been included that considers the cumulative noise effects of the Northern Block, Northern Block- Pit 1, Central and Southern Blocks.

I have attached the high-level acoustic report provided to support the Northern Block-Pit 1 application (see **Attachment 9**). We note that while we are one of, if not the closest sensitive receptor, for some reason our dwelling was not included within this assessment and noise effects on us were not considered. Despite this, the high-level assessment confirms that the noise from Pit-1 alone would match (but not exceed) the night-time noise limit received at the nearest sensitive receptor (not including the Wetini dwelling). These works are located a significantly greater distance from sensitive receptors than those within the wider Northern and Central Blocks (the nearest dwelling is just over 20m from the Central Block). Based on this assessment logic would suggest that it would not be possible to achieve compliance with noise standards at night-time particularly with no setback proposed and when considering cumulative noise effects.

It is our expectation that an acoustic report that addresses noise effects from the Northern Block as well as cumulative noise effects from the entire mine lease area would be included within any Fast Track application.

Land disturbance effects are summarised in two sentences under 5.1.4. You have stated that "*Given the mine has a good operational history with no erosion issues requiring mitigation, a rehabilitation process and revegetation plan is followed for disturbed areas, and perennial waterbody mining setbacks are imposed, any adverse effects can be considered negligible.*"

This assessment does not align with the facts. It became very clear throughout the hearings process for the Central and Southern Blocks that TIL does in fact have a very poor compliance history particularly in regard to rehabilitation. This was confirmed by the Waikato Regional Council's monitoring officer and is apparent from the absence of vegetated areas and significant dust issues ourselves, and others have experienced.

Within the time TIL has been the consent holder they have not demonstrated that they are able to successfully rehabilitate the site following mining. There is no evidence of successful rehabilitation within the Central or Southern Blocks. We have expressed our concerns in regard to rehabilitation and resultant amenity and dust effects within our statement of evidence for the Central and Southern Blocks and in a letter sent to WRC (see **Attachment 6**). These concerns remain.

TIL intend to mine up to 30m from the Mitiwai Stream. No technical documents have been provided that would support a 30m setback which is contrary to recommendations of experts as part of the resource

consent and hearings process and inconsistent with the 100m setback required under conditions of consent contained within **Attachment 5**. We would not support a setback of less than 100m from the Mitiwai Stream. Similarly, we would not support a setback of less than 100m from all natural inland wetlands within the Consent Area inclusive of the Northern Block.

Cultural Effects have not been adequately considered within the consultation document for the Northern Block Fast Track application. Of specific relevance to us, in neglecting to listen to the concerns the Roy Wetini Whaanau Trust have raised previously in regard to rehabilitation, dust, noise and by ignoring our request for an adequate setback from external boundaries, TIL have failed to consider our relationship with our culture, traditions and ancestral lands, water, sites, waahi tapu and other taonga. Furthermore, the proposal does not include an adequate assessment of effects on the Mitiwai Stream which, as you know is a culturally significant awa.

Overall, the cursory Assessment of Effects for the Northern Block is insufficient in addressing the concerns we have raised previously in regard to mining activities at the Central and Southern Blocks. We do not intend to repeat all of these concerns, which are detailed within **Attachments 1 and 2**.

These concerns are applicable to the Northern Block also with the added concern of cumulative effects arising from works within the Central and Northern Blocks (inclusive of Pit 1). We are deeply concerned that in time, our dwelling will become uninhabitable severing our ties to our ancestral lands and the whaanau urupaa that we are kaitiaki for.


You have confirmed in your letter that "*TIL understands your view in respect of the Mine and the consenting of the Central and Southern Blocks from that process.*" While it is possible that you understand our view, TIL have not undertaken or proposed to undertake any actions that would address any of our concerns.

In response to your letter, we can confirm that the Roy Wetini Whaanau Trust would support a Fast Track application for the Central and Southern Blocks if the application incorporates those conditions of consent contained within **Attachment 5**.

Based on the limited information provided to us on the Northern Block we would have no option but to oppose any Fast Track application for the Northern Block due to the significant potential for adverse effects on ourselves, the land we are kaitiaki for and te taiao.

Naa,



 (on behalf of the Roy Wetini Whaanau Trust)

30.07.25

Taharoa Ironsands Limited

Wayne Coffey: email [REDACTED]

Teena koe Wayne,

We are writing to express our disappointment following our attendance at the meeting held with TIL on Wednesday 16th June at Waitomo Hotel. As you know, my father [REDACTED] and I drove a 4.5 hour round trip from New Plymouth for this meeting.

In your email received on 24th June you had confirmed receipt of our feedback on TIL's Fast track consultation document and extended an invitation to meet to discuss this application or answer any questions. It was our expectation that this was a consultation hui on TIL's Fast track applications for the Central and Southern and Northern Blocks.

The trustees of the Roy Wetini Whaanau Trust have read meeting minutes (attached) and discussed this hui and we can confirm that we **do not** in any way consider this meeting to constitute consultation on either the Central and Southern or Northern Fast track applications for the following reasons:

- *TIL did not refer to the feedback that we had provided on the Central and Southern or Northern Fast track consultation documents at any stage during the meeting;*
- *TIL would not confirm how the concerns that we had raised during the hearings process and in our response to the 'consultation document' for the Fast-track application would be addressed within the Fast track application/s.*
- *We were provided with no further information in regard to the proposed conditions of consent nor were we given a response to our request for TIL to include conditions of consent that would address our concerns.*
- *TIL would not confirm key details including whether a setback is proposed from external boundaries. Ms [REDACTED] confirmed that the Central and Southern Block application would be substantially the same as the original resource consent application. When we asked for confirmation that no setback is proposed from external boundaries (as per the resource*

consent application and plan included in the consultation document), we were not provided with a response.

- While one person from the 'consents team' [REDACTED] was present for the second part of this hui, when we directed a question to him (how have the concerns of the Roy Wetini Whaanau Trust been addressed in the Fast track application?), you instructed Mr [REDACTED] not to respond to this question.
- We were instructed not to ask Mr [REDACTED] any further questions during the meeting and therefore while one technical expert was present, this was of no value to us.
- We have not been provided with sufficient details to provide meaningful feedback on the application. During the meeting, we requested conditions of consent/ the full application as soon as possible so that we can provide meaningful feedback. Ms [REDACTED] confirmed that there will be limited time between this information being ready and TIL lodging the Central and Southern Fast track application and that we will instead have an opportunity to submit feedback through the Fast track process.

We left more confused than when we entered the meeting. The only new information we were provided with from this hui can be summarised below:

- TIL will be lodging two Fast track applications with Central and Southern to be prepared and filed first and Northern Block to be prepared and filed second.
- The Central and Southern Block applications are to be filed as soon as possible. The appeal is on hold until 31st July, however TIL requires more time to prepare the fast-track application and are looking to lodge within 1-2 months. Applications are currently being prepared.
- The Central and Southern application will be substantially the same as the resource application (no specific details provided/ consent conditions or confirmation of any setbacks from external boundaries).
- TIL have confirmed that while they have no objection to sending through further details of the Fast track application including conditions of consent and technical documents, there is unlikely to be a gap between this information being ready for the Central and Southern Block application and lodgement. Any feedback we have will need to be submitted through the formal Fast track process.

This limited information could have been provided to us in an email. In our opinion, there is consistency with TIL's approach to 'consultation' with the RWWT. In our experience this is nothing more than a box ticking exercise as opposed to meaningful engagement with a genuine intention to address our concerns where possible.

While we remain open to attending a consultation hui in regard to TIL's Fast-track applications, trustees have unanimously agreed that this is only to proceed under the following conditions:

- *The purpose of the hui is for TIL to undertake meaningful engagement with the RWWT on the Fast-track applications;*
- *An agenda is pre-circulated and agreed upon beforehand to ensure both parties are clear on what will be discussed/ information available at this hui;*
- *Necessary experts are present at the hui, permitted to speak and to respond to questions from trustees.*
- *A minimum of two trustees from the RWWT are to be present at all times for the duration of discussions.*
- *Given the considerable time spent in attending the meeting on 16th July, which was attended at our own expense, any consultation hui is to be held either in New Plymouth (location to be determined) or on zoom.*
- *This meeting is to be recorded for trustee records.*

One final matter that we would like to address is regarding the private discussion you had requested with one of the two trustees present [REDACTED] at the conclusion of the meeting. Mr [REDACTED] has relayed to the trustees that you had requested (and [REDACTED] had agreed at the time) that our trust provides TIL with a list of measures/ requests that would address our concerns. Trustees have considered this request and can confirm that we have already provided this to you in our letter dated 12th June 2025 (see attached). Within this letter we have outlined key mitigation measures that would address a number of our concerns which TIL are yet to respond to. We ask respectfully that in future you refrain from singling out individual trustees for private discussions. As this land is held in a whaanau trust, no decisions that affect the whenua/ trust can be made by an individual trustee. All decisions are made by the Roy Wetini Whaanau Trust.

We look forward to your response to our feedback and to future opportunities for meaningful engagement.

Naaku noa naa,



[REDACTED] (on behalf of the Roy Wetini Whaanau Trust)

Attachment 7: Attachment AB to WRC 42A Report Addendum- Central and Southern Resource Consent

Attachment AB

File Note

File No: 60 40 32A

Date file note created: 17 April 2024

Date(s) content of file note refers to: 17 April 2024

Author: [REDACTED]

Subject: File Note - Taharoa Ironsands Limited –Rehabilitation Review (2017 to 2023)

Introduction

Taharoa Ironsands Limited (TIL) are required to submit annual self-compliance reports as part of consent requirements which include reporting on rehabilitation undertaken over the prior 12 months as well rehabilitation planned for the upcoming 12 months for the Central/Southern blocks.

This file note summarises WRC's recently undertaken review of the planned rehabilitation vs rehabilitation completed since Taharoa Ironsands Limited acquired the site in 2017 and quantify the total area of rehabilitated land undertaken between 2017 to present (2024).

This assessment was undertaken to determine whether Taharoa Ironsands Limited have undertaken rehabilitation works in general accordance with the approved rehabilitation plan (WRC DOC# 3261348), which outlines that rehabilitation taken will be required at an approximate rate of 10-15 ha/yr.

Please see table 1. for a summary of rehabilitation undertaken compared to rehabilitation planned for each reporting period/FY.

Table 1. Summary of planned vs completed rehabilitation.

Reporting period	Rehabilitation Completed	Rehabilitation Planned	Minimum rehabilitation to be not undertaken to be in accordance with approved Rehabilitation Plan (rolling total)
2017/18	0 ha	0 ha	10 ha
2018/19	0 ha	25.6 ha - NW of central block (Area 1) 1.8 ha - Northern Road (Area 2)	20 ha
2019/20	0 ha	13.3 ha - TA10 and TA6	30 ha
2020/21	0 ha	0.1 ha - TA06	40 ha
2021/22	0.1 ha	Approx 1 ha - Gate/Monument	49.9 ha
2022/23	0.96 ha	6 ha - Monument area (already stabilised)	58.94 ha
2023/24	6 ha - monument (verified on site visit)	TBC (Annual report to be submitted to WRC in August 2024) WRC visited the site on the 2 nd of May and observed 7 ha of TA 06 has been coconut-matted in preparation for planting of these areas. To be assessed upon completion.	62.94 ha

Doc # 29011358

Signature: [REDACTED]
File note completed by [REDACTED]
Date file note completed: 16th July 2024

In Summary, TIL have not undertaken rehabilitation in accordance with the approved rehabilitation plan which states that 10 – 15 ha/year will require rehabilitation. Based on the rehabilitation information provided in annual self-compliance reports as well as site visits undertaken by WRC, TIL have only completed approximately 7.06 ha out of 70 ha rehabilitation required between 2017 and 2023.

Below WRC provide further commentary on rehabilitation during each reporting period based on the information held/received by the Council.

2017/18 - Self-Compliance Audit Report (WRC DOC# 12824085)

- Rehabilitation Completed: 0 Hectares
- Rehabilitation Planned: 0 Hectares

TIL stated in their annual self-compliance report for 2017/2018 that no areas of the mine were rehabilitated during this period, which was attributed to disturbance to all previously disturbed areas. TIL state this was consistent with the previous New Zealand Stee Mining (NZSM) mine plan, however, this was inconsistent with the approved Landscape and Rehabilitation Plan (2015).

A full review of the mine plan was currently being undertaken including rehabilitation. TIL confirmed that this review would consider temporary rehabilitation/stabilisation of areas that may be disturbed again, and it was anticipated that these areas would commence in 2019.

WRC Compliance Audit 2017/18

As a result of failing to undertake rehabilitation activities as per the Landscape and rehabilitation plan. WRC provided the following required action in the 2018 compliance audit report (WRC DOC# 12660236) to be undertaken by TIL during the 2018/2019 reporting period.

Schedule 2	11	It is noted that rehabilitation activities for the mine are not currently being undertaken as per the Landscape and Rehabilitation Plan. The significant area open and the lack of ongoing rehabilitation for the site is of concern. Please provide an updated rehabilitation plan showing the areas to be rehabilitated to year ending 30 June 2019. This plan shall be provided with the annual report by 1 September 2018.
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Despite the required actions outlined below, WRC assessed this condition as full compliance for the 2017/18 reporting period.

2018/2019: Self-Compliance Audit Report (WRC DOC# 14776384)

- Rehabilitation Completed: 0 Hectares
- Rehabilitation Planned: 25.6 Hectares (NW Central block - Area 1) and 1.8 Hectares (Northern Road – Area 2)

No rehabilitation works were undertaken during the 2018/2019 reporting period which was attributed to the same reasons as the prior reporting year. However, TIL provide a revised rehabilitation schedule in the annual compliance report which outlined the areas to be rehabilitated up to 2022, See the below screenshot from the 2018/2019 report.

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File note completed by [REDACTED]

Date file note completed: 16th July 2024

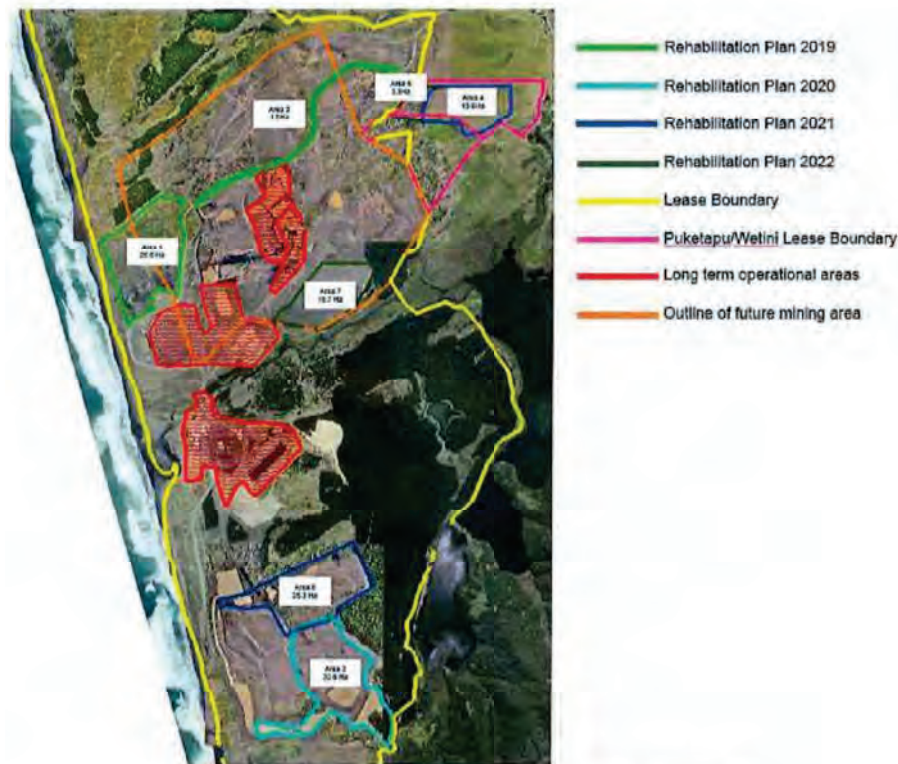


Figure 2. South and Central region, Proposed rehabilitation areas

Although Area 1 in figure 2. above states that 25.6 hectares will be rehabilitated, TIL's report confirmed that rehabilitation of 11 hectares with area 1 would commence as well as 1.8 hectares on the verges of the central access road (area 2). This planned rehabilitation works would have been in accordance with the mine landscape and rehabilitation plan for the 2019/2020 reporting period due to 12.8 hectares proposed to be rehabilitated. However, on cumulative basis the site would still be non-compliant due to a further 7.2 hectares requiring rehabilitation to account for the prior year.

WRC Audit 2018/19

TIL provided this update on proposed schedule of rehabilitation within the annual self-compliance audit report for 2018/2019, WRC noted this as a low priority (risk) non-compliance as this was not supplied to WRC by 1st of September 2018 and an updated landscape and rehabilitation plan had not yet been received. No rehabilitation had been undertaken prior to 30th June 2019 (WRC DOC# 14515464).

2019/2020 – Self Compliance Audit Report (WRC DOC# 16944046)

- Rehabilitation Completed: 0 Hectares
- Rehabilitation Planned: 13.3 hectares (TA10 and TA6)

No areas of the mine were rehabilitated during the 2019/2020 reporting period, despite TIL outlining that 12.8 hectares would be rehabilitated on site. TIL's reasoning for difficulties undertaking the rehabilitation works for this reporting period was due to the COVID-19 pandemic (lockdowns) preventing rehabilitation workers from accessing the site as they were not considered essential. However, it is noted that for the reporting period of 2019/2020, TIL had approximately 9 months where staff had full access to the site and no rehabilitation occurred. Availability of plants was also raised as an issue.

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File note completed by [REDACTED]
Date file note completed: 16th July 2024

To increase supply of plant species and assist revegetation of rehabilitated land, TIL proposed to establish a nursery on site. (This well-established on site at present)

TIL did not provide clarification on whether uncompleted rehabilitation would be rescheduled for the 2020/2021 reporting period. TIL reported that areas referred to as TA10 and TA6 had been identified for rehabilitation across the 2020 - 2022 programme equating to 13.3 hectares. (See figure 2. Extracted from the 2019/2020 TIL Compliance report)



Figure 2.01: TA10 Proposed rehabilitation area



Figure 2.02: TA10 Proposed rehabilitation area

WRC Audit 2019/2020


No assessment was undertaken on site rehabilitation progress during the reporting period of 2019/2020.


2020/2021 - Self Compliance Audit Report (WRC DOC# 25639548)

TIL confirmed the construction of the onsite nursery was commenced in August 2020, providing 3,000 m² of fenced off area to establish locally sourced native seedlings, prior to planting within rehabilitated areas.

No rehabilitation was undertaken during this reporting period and TIL were not undertaking rehabilitation works in accordance with the approved landscape and rehabilitation plan or updated planting schedule provided to WRC in 2018/19 reporting period. TIL provided no statement as to why rehabilitation targets were not achieved and whether these areas would be included in the upcoming programme for this reporting period.

TIL still proposed that 0.1 hectares of TA6 would be rehabilitated with 500 native plants for the upcoming reporting period. This area would be cordoned off by an electric fence to keep out livestock.

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Date file note completed: 16th July 2024

WRC Audit 2020/2021

WRC's assessment for this audit period was restricted to assessing the updates to management plans. TIL was undertaking updates of the Landscape and Rehabilitation Management Plan to include details of the plant nursery, revised planting schedule and availability of land for rehabilitation. WRC assessed relevant conditions as full compliance.

2021/2022 – Self Compliance Audit Report (WRC DOC# 25639073)

As stated by TIL, 0.1 hectares was proposed to be planted with native species from the on-site nursery. TIL confirmed that this work was completed during 2021/2022. This work was only partially successful due to the effects of wind-blown sand smothering smaller plants reducing survival rates.

Areas within the central access road margins adjacent to the site monument (see figure 3. below Extracted from TIL's report) was marked out for planting during the 2022 period. It was not stated the exact total area that would be completed.




Figure 3 Area planned for planting winter 2022

At this stage, since TIL have acquired the mine site, only 0.1 hectares of rehabilitation have been completed (partially), leaving a deficit of 49.9 ha of minimum required rehabilitation to comply with the landscape and rehabilitation plan.

(Note: No audit was undertaken by WRC during this reporting period due to staff changes)

2022/2023: TIL Self Compliance Report (WRC DOC# 27581223)

In January 2023, TIL confirmed that fencing off and planting was undertaken across 0.96 hectares adjacent to the monument which was proposed to be completed in the prior audit (see figure 3. Above). In addition, TIL stated that a further 6ha of planting would be undertaken within the monument area now that completion of fencing had been completed in July 2023 (See figure below extracted from the 2022/2023 report). Planting was scheduled to carried out August/September 2023.

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Figure 2. Proposed area for planting in August/September 2023, near the Taharoa Monument.

TIL also had begun to conduct trials for dust stabilisation controls such hydro-mulching unused tailings areas. An area of 1.75 hectares between TA09 and TA06 was used for the trial which was separated in four blocks to test four different seed ratios and fertiliser application. The trial was only partially successful, due the lack of substrate and nutrients availability significantly impacting survival/grass strike.

WRC Audit 2022/23

WRC’s assessment highlighted that an on-going issue on the site is timely and effective progressive rehabilitation is not occurring on site and assessed this as low risk non-compliance. WRC emphasised that to avoid potential adverse effects from unrehabilitated land a significant focus should be placed on progressive rehabilitation in accordance with the approved landscape and rehabilitation plan, and outlined the following actions required;

<p>Mining Operations: Taharoa – Schedule Two</p>	<p>Schedule Two 8</p>	<p>The consent holder should provide WRC with comprehensive rehabilitation plans outlining how the inactive/completed open areas will be rehabilitated in accordance with the procedures/outcomes in the Site Rehabilitation plan, by 31st August 2023.</p>
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In response to WRC’s required action, TIL provided a rehabilitation action plan for the upcoming audit period (WRC DOC# 27150942), detailing planned rehabilitation efforts for the 2023/24 audit period.

2023/24 Compliance Reporting period (Self-Compliance Report yet to be submitted)

WRC are yet to receive this year’s self-compliance audit report from TIL, due in August 2024, which will provide further information on rehabilitation completed and planned works for the upcoming 12 months. However, during site visits conducted by WRC during the 2023/24 reporting period, 6.96 hectares proposed to be planted TIL have been undertaken successfully. (See the screenshot below from Google Earth Pro, November 2023)

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Captured in Google Earth Pro (March 2024)

WRC Audit 2023/24

Since the last audit, rehabilitation has continued to not be undertaken in accordance with the approved Landscape and Rehabilitation Management Plan with approximately 7 ha only being completed in the current reporting period with a deficit of 23 ha over the past 3 years as well. WRC compliance with rehabilitation conditions as moderate non-compliance due to failure to comply with prior actions. WRC also issued the following actions to be complied with during the 2024/25 reporting period below;

Mining Operations: Taharua - Schedule Two	8	TIL must undertake 10 - 15 ha of rehabilitation/stabilisation over the next 12 months in accordance with the site rehabilitation plan and TIL must engage an appropriately qualified person in sand dune restoration/rehabilitation to supervise these works. TIL will provide details of the qualified persons experience and qualifications for these works.
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During WRC's visit to the site on the 2nd of May 2024, it was observed that 7 ha of TA 06 have been covered in coconut-matting in preparation for final closure and planting. The completion of these works will be assessed in the next audit period, and therefore have not been accounted for in the completed rehabilitation works to date. TIL will require to complete a further 3 ha minimum in the upcoming audit period to comply with minimum rehabilitation requirements. [Choose an item](#)

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 Date file note completed: 16th July 2024