

20 May 2026

**By Email: substantive@fasttrack.govt.nz**

Expert Panel  
Central and Southern Blocks Mining Project  
Private Bag 63002  
Wellington 6140

Tēnā koutou

**The Proprietors of Taharoa C Block Incorporated's comments on the Central and Southern Blocks Mining Project (FTAA-2512-1153)**

1. This letter is provided on behalf of the Committee of Management of the Proprietors of Taharoa C Block Incorporated (**Taharoa C**). The Committee administers Taharoa C Block (**whenua**), being the Māori freehold land on which the Taharoa Ironsands Mine (the **Mine**) is located.
2. Taharoa Ironsands Limited (**TIL**) holds a mining lease over the whenua. The lease provides the basis for TIL's mining activities on the whenua, including the proposed Central and Southern Blocks Mining Project (the **Project**).
3. The Committee of Management are the kaiwhakahaere of the whenua and manage the whenua on behalf of approximately 2,200 shareholders. The voice of Taharoa C as landowner is critical to TIL's application for the Central and Southern Blocks Mining Project (the **Application**) for the following reasons:
  - (a) Taharoa C and its shareholders hold mana motuhake over the whenua and must be consulted directly on the Application and on activities affecting its whenua.
  - (b) The relationship of Taharoa C with the whenua will endure well beyond the life of any mining project. Taharoa C bring both historical knowledge and an intergenerational perspective that are essential to informed decision-making.
  - (c) Through direct participation, Taharoa C can help shape conditions that reflect its own values and priorities, rather than external benchmarks alone.
  - (d) Taharoa C has worked alongside this mining operation for decades and have observed its development, including the establishment of the village, the growth of the mining operation, and the benefits it has brought.
  - (e) Taharoa C has also directly observed the use of the whenua, the management of environmental effects of the mining operation, and its economic benefits.
  - (f) The benefits generated by the mining operation stand as evidence that the decisions made by prior generations of owners were sound and beneficial.

- (g) Taharoa C are uniquely placed to provide informed views on the mining operation, its implementation, and the economic and social value it has delivered.
4. TIL has made commitments to Taharoa C that the mining operation will be undertaken using best practice methods, there will be no unnecessary damage or waste to the whenua in undertaking the activities, that the whenua will be returned in a good state and condition, all possible precautions will be undertaken to prevent damage to historical places and areas, and ongoing consultation will be undertaken prior to interfering with any stream or creek on the whenua with a view to safeguarding fishing and associated rights.
  5. Taharoa C has held an active commercial relationship with the mining operations for more than 50 years. Under its current ownership and management, TIL has proven to be a credible and skilled operator of the Mine. The relationship has proven to be stable and economically successful. We welcome continuing the relationship.
  6. The Mine has formed part of the historical and current use of the land and is expected to remain part of its foreseeable future use. For more than 50 years, the Mine has enabled Taharoa C to build an economic base to support its people. It has delivered enduring socio-economic benefits to the Taharoa community, including significant income for shareholders of Taharoa C and local employment opportunities.
  7. Taharoa C supports TIL and the Central and Southern Blocks Mining Project. It welcomes the opportunity to ensure that its voice is heard at every stage of the Application.

Nāku noa,nā



Hoturoa Barclay-Kerr  
Chairperson on behalf of the Committee of Management of the Proprietors of Taharoa C Block Incorporated

## APPENDIX

1. This letter provides the Panel with an understanding of:
  - (a) Taharoa C's historical background and ownership interests;
  - (b) The mining operation with Taharoa Ironsands Limited (**TIL**);
  - (c) Taharoa C's comments on the effects of the Central and Southern Blocks Mining Project (the **Project**); and
  - (d) Taharoa C's overall support for the Project.

### Historical Background and Ownership Interests

2. Taharoa C owns Taharoa C Block (**whenua**) located at Taharoa Road, Taharoa (SA34B/688). The whenua is Māori freehold land and is the location of the Mine, which is operated by TIL under a lease agreement with Taharoa C.
3. Ngāti Mahuta ki Tai (Ngāti Mahuta ki te Hauāuru) are mana whenua of the rohe in which the whenua is located. They have held mana whenua since approximately 1820. Taharoa C does not speak on behalf of mana whenua. The whenua at Taharoa has never been confiscated by the Crown – the Māori landowners have had uninterrupted ownership of the whenua since it was originally settled.
4. Prior to the establishment of Taharoa C, the whenua was held in 80 separate titles, owned by members of Ngāti Mahuta hapū. The status of the whenua has always been Māori freehold land and in 2009 this was confirmed by the Māori Land Court.
5. Taharoa C was established in 1972, the same year that ironsand mining (including the construction and use of the offshore pipeline and associated buoy) began at Taharoa. A large number of shareholders of Taharoa C are members of Ngāti Mahuta hapū and are descendants of the original owners of the whenua. Many of the shareholders of Taharoa C have established Whānau Trusts for their shares and other Māori freehold land interests. Some of those Whānau Trusts also own other land at Taharoa, adjoining and adjacent to the whenua.
6. Taharoa C provided its written approval for the Project as the owner of the whenua and it is attached to the Application as Appendix D.
7. Taharoa C has a fundamental responsibility to its shareholders and the protection, utilisation and development of the whenua on behalf of the shareholders. This responsibility includes the duty to uphold mana motuhake and kaitiakitanga in respect of the whenua and ensure it is utilised in a productive and sustainable manner.
8. As outlined in our cover letter, the Mine has formed part of the historical and current use of the whenua and is expected to remain part of its foreseeable future use. For more than 50 years, the Mine has enabled Taharoa C to build an economic base to support its people. It has delivered enduring socio-economic benefits to the Taharoa community, including significant income for Taharoa C. It has also provided local employment opportunities for the Taharoa community.

### **The Mining Operation**

9. TIL holds a lease of the whenua for mining purposes which provides implicit consent to TIL's Project. The lease ends in 2042 with a right to renew until 2062. Among other things, the lease provides that TIL will:
  - (a) at all times work and manage any mines by the most approved manner;
  - (b) not commit any unnecessary damage or waste in and about the whenua in carrying out activities;
  - (c) deliver the whenua back to Taharoa C in good state and condition;
  - (d) progressively (as mining operations are complete in parts and the whenua is no longer needed) contour each part of the whenua to easy grades to facilitate as far as practicable the establishment of revegetation using stabilisation species and plantation Forestry;
  - (e) take all possible precautions to prevent damage to historic places, burial grounds, relics, artefacts, fossils and antiquity. Upon discovery, TIL will notify Taharoa C of such a discovery and await instructions as to the disposal or protection of such material;
  - (f) as far as possible, draw upon the Taharoa population for its workforce; and
  - (g) consult with Taharoa C before interfering with any stream or creek on the whenua with a view to safeguarding fishing and associated rights as far as is practicable.
10. Taharoa C has consented to TIL using the whenua for mining purposes, and to it obtaining all necessary approvals to do so.

### **Benefits of the Mining Operation**

11. Since the inception of the Mine, Taharoa C has received substantial economic returns including payments of over \$150 million.
12. In 2016, the foreign owned New Zealand Steel Mining Limited announced that it intended to sell the Mine or otherwise close it. Bluescope, the Australian owners of NZSML at the time, publicly indicated they were not prepared to make the necessary investment for the Mine to continue operating. Just a few years earlier, Bluescope had also announced the sale of NZSML to another foreign buyer which collapsed publicly with court action ensuing. Through this period of uncertainty, the community felt vulnerable and unsettled, wary that the Mine would close. This threatened the economic collapse of the Taharoa community and its village. In an audacious move, the Mine was purchased by TIL which was partly owned by Taharoa Mining Investments Limited. The Mine needed to expand to a sustainable level, being enough production to at least support the long-term commitments to three dedicated Taharoa slurry vessels. Without that production the mining business would not be viable, and the Mine would close.
13. We understand that TIL has invested hundreds of millions of dollars into new capital equipment to make the business viable. In turn, Taharoa C has supported that investment because it greatly extends the working life of the Mine and of course earns royalties for future generations of Taharoa C shareholders.

14. The Mine has, in many ways, helped a number of shareholders to retain and remain on their ancestral land in Taharoa, strengthening their connection to that whenua.
15. As set out in TIL's Application, in 2025 TIL directly employed 240 people, approximately 70% of which are Ngāti Mahuta. This aligns with TIL's commitment under the lease to as far as possible draw on the population of Taharoa for its labour force. This is important to enable shareholders to continue to live and work in the district and maintain their connection with the whenua and wider Taharoa lands. Because of the ironsands, the whenua has notable commercial value and the Mine is the only significant commercial operation and employer in the district.
16. As set out in the Application, TIL provides support and benefits to the community. TIL has donated community facilities, including the community hall, school, shop, sports facilities and contributions to lawn maintenance of Taharoa mining houses, attends to waste, wastewater, drinking water, rubbish collection and maintenance of public areas free of charge.

### **Comments on Effects of the Project**

17. For Taharoa C, the following general principles underpin the relationship between Māori with natural resources and their use and management:
  - (a) Whakapapa – genealogy or lineage linking the animate and inanimate
  - (b) Kaitiakitanga – guardianship and stewardship by tangata whenua
  - (c) Mana whenua – territorial right from generational occupation of land
  - (d) Rangatiratanga – leadership, identity, and self-determination
  - (e) Taonga – treasured or valued items (whether tangible or intangible)
  - (f) Mauri – essence or life force
  - (g) Wairuatanga – embedded emotion or spirit
  - (h) Whanaungatanga – kinship/membership and participation
  - (i) Manaakitanga – hospitality, respect and security
  - (j) Kotahitanga – cohesion and collaboration
  - (k) Ahi kā - long lasting burning fires of occupation, title to land
  - (l) Ki uta ki tai - 'From the mountains to the sea,' holistic understanding of natural environment
18. It is important to understand that mining has very much informed the historical context of the whenua. It was something that our forebears put in place when the mining operation was initially established in Taharoa. The view of Taharoa C is that ongoing mining is appropriate, when done in the right way.
19. Taharoa C is committed to working with TIL collaboratively to gain additional certainty of key environmental management matters that are important to Taharoa C and its shareholders and to make sure that:

- (a) Taharoa C has an understanding and oversight of TIL's mining activities, so that Taharoa C is informed and able to act as a good neighbour and landowner as they pertain to activities occurring on their land; and
  - (b) Taharoa C develops a long-term legacy and vision for the whenua once the mining activities are complete, so that the restoration/end of life plan can contribute to giving effect to these outcomes.
20. It is also important to Taharoa C that:
- (a) the wetlands, awa, and waterways (including groundwater) are protected or restored practicably, in the context of the long-term legacy and vision for the whenua;
  - (b) that good environmental practice and continuous improvement measures are put in place by TIL around management of effects from the site in a responsible manner, such as those regarding management of dust and mining discharges to air to minimise nuisance issues beyond the boundary of the site.

#### *Lake and waterway health*

- 21. The establishment of the dam in the Wainui Stream in the early 1970s interrupted the natural flow of water from Lake Taharoa to the ocean. In doing so, an impediment to the passage of fish to and from the lake was created and the available fish resource in the lake decreased. The mauri and wairua of those waterbodies were affected accordingly.
- 22. However, in the early 2000s a fish pass was installed at the dam that allowed for juvenile grey mullet and other species to be able to navigate upstream past the dam. The fish pass has proven to be effective and should be kept and appropriately maintained. Surveys, records and inspections by experts have all shown healthy numbers and trends, which are supported by extensive local reports of healthy fish stock.
- 23. As set out in the Application, lake levels are generally within a consistent range and, to our knowledge, the minimum lake level has never been exceeded and valuable wetland habitat has formed around the lake margins. The minimum lake operating level conditions currently in place should remain. Conditions requiring mining setbacks from the lake and the Wainui Stream and natural wetland habitats are also supported and mitigate effects on the mauri and wairua of these resources.
- 24. As set out in the Application, there have been very occasional and isolated incidents at the mine in the past that have had potential effects on lake and waterway health. When such incidents have occurred, we understand that TIL has addressed them promptly, with appropriate remedial measures implemented to mitigate effects and reduce the likelihood of recurrence.

#### *Discovery of Koiwi*

- 25. The discovery of Koiwi at the Mine has occurred from time to time over the years in inland areas. If any discoveries are made, kaumātua nominated by Taharoa C attend the site and observe tikanga which is derived from many years of interacting with discoveries of koiwi and taonga in the Taharoa dune system.
- 26. Legally and physically defined urupā exist within the dune system where koiwi discovered in the Mine site are interred. No mining activity is undertaken within or in close proximity to the urupā. There is observance and clear demarcation of these areas.

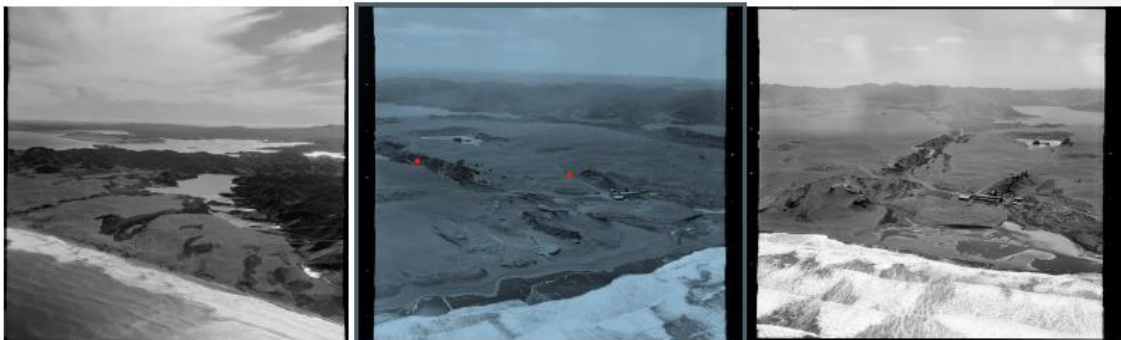
27. Taharoa C provided input into the Archaeology Report, including requesting updates to TIL's "Taharoa Mine Site Health and Safety - Environmental Procedure: Discovery of Human Remains and/or Items of Cultural Significance", to add a requirement for TIL to inform Taharoa C, as well as the Police, if any bones are discovered and to provide Taharoa C with a copy of any archaeological records prepared. Taharoa C also provided a Māori cultural values report for the Archaeological Authority Application, which concluded that:

*In line with our values, the accidental discovery protocols and the ability to exercise our own tikanga within these protocols have now been formalised into a draft Archaeological Management Plan. The continuation of these protocols and regular mining plan updates maintains integrity of the relationship between TIL and the Proprietors of Taharoa C Incorporation. This will ensure that the significant cultural values associated with the Taharoa C Block are recognised and provided for and the adverse effects of ongoing mining excavation activity on those values are mitigated and appropriately managed.*

28. Taharoa C was also provided with an opportunity to review and provide input to the updates to Archaeological Authority conditions and TIL's "Taharoa Mine Site Health and Safety - Environmental Procedure: Discovery of Human Remains and/or Items of Cultural Significance" arising out of discussions with HNZPT and did so.

### **End-of-Life and Closure Considerations**

29. Taharoa C recognises the value of mineral extraction for economic and social reasons. TIL is committed to ensuring that the whenua will be rehabilitated to a high standard to ensure that the legacy of mining does not harm the cultural and ecological wealth of the area. This is consistent with the Lease obligations.
30. The form of the land before the establishment of the Mine is illustrated by the following photos taken in 1958 and 1975 (Figures 1 -3).<sup>1</sup>



31. It goes without saying that Taharoa C have no interest in seeing the site left in a post-closure state that would be detrimental to the environment and consider that it should be left in a manner that is informed by best practice in coastal rehabilitation.
32. The proposed consent conditions provide for consultation with Taharoa C and other key interested parties in respect of the development of an updated Conceptual Site Closure Plan and Site Rehabilitation Plan. Because of the legacy implications, and in part response

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<sup>1</sup> Figure 1: Taharoa C Block in 1958 before the establishment of the Mine. Figure 2: Taharoa C Block in 1975 before the establishment of the Mine. Figure 3: Taharoa C Block in 1975 before the establishment of the Mine.

to our shareholders' growing interest in understanding and participating in the development and implementation of the restoration of the Mine site, Taharoa C and TIL will engage collaboratively in that process.

33. Taharoa C would like to make sure that our current generations can see the progressive work towards restoration being achieved, visibly, over the course of this next consent term.
34. Taharoa C understands that TIL will be held sufficiently liable to ensure that the whenua is appropriately rehabilitated progressively, and complete by the end of the Mine's life under the consent conditions (and through the Resource Management Act 1991).

### **Conclusion**

35. Taharoa C has reviewed the Application documents and confirms its support for the Application for the reasons set out above. In support of the Application, Taharoa C provided:
  - (a) its written approval for the Project to take place on Māori land, in accordance with s 43(1)(c) of the FTAA (Appendix D).
  - (b) a cultural values report to inform the Archaeological Authority Application (Appendix X).
  - (c) its written consent for the mining activities as part of the Archaeological Authority Application in accordance with schedule 8, clause 2(c) of the FTAA (Appendix X).
  - (d) its written approval to the resource consent applications (Appendix LL).
36. Taharoa C's support for the continuation of the Mine is not based on commercial considerations alone, but also on its enduring connection with the whenua and its commitment to the wellbeing of the Taharoa community. If the Mine's consents were declined, or issued subject to conditions that did not support the continued and economically sustainable operation of the Mine, this would have a significant negative economic impact on the Taharoa community.
37. Because of the significant socio-economic benefit the Mine provides, Taharoa C supports the approvals for the Project being granted for the full duration of 35 years. This duration ensures operations at the Mine, and the associated benefits to Taharoa C, can continue through to the early 2060's, broadly in line with the term of the lease.

Nāku noa,nā



Hoturoa Barclay-Kerr  
Chairperson on behalf of the Committee of Management of the Proprietors of Taharoa C Block Incorporated