

Submitted to Fast-track approval applications  
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Submitter details

Is this application for section 2a or 2b?

2A

1 Submitter name

Individual or organisation name:  
Taharoa Ironsands Limited

2 Contact person

Contact person name:  
Stephanie de Groot

3 What is your job title

Job title:  
Counsel for the applicant

4 What is your contact email address?

Email:  
s 9(2)(a)

5 What is your phone number?

Phone number:  
s 9(2)(a)

6 What is your postal address?

Postal address:  
  
C/- MinterEllisonRuddWatts  
PO Box 105 249  
AUCKLAND 1143

7 Is your address for service different from your postal address?

No

Organisation:

Contact person:

Phone number:

Email address:

Job title:

Please enter your service address:

Section 1: Project location

Site address or location

Add the address or describe the location:

The Taharoa Ironsand Mine has been in operation since 1973 and accesses the largest ironsand deposit in New Zealand. It is located on Māori land at Taharoa, on the North Island's West Coast, approximately 8km south of Kāwhia and 45km to the northwest of Te Kuiti (see map attached). The Mine's address is Taharoa Road, Taharoa. The Mine is divided into blocks, known as the Central, Southern, Northern and Eastern Blocks and the Te Mania Extension.

This proposal relates to the Northern Block of the Mine which comprises:

- the land on Taharoa C Block to the north of the Mitiwai Stream (excluding the first mining pit in that block, called Pit 1); and
- a small area of adjacent land called Taharoa A1C6 Block (Northern Block).

File upload:

Northern Block Site Plan.pdf was uploaded

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Do you have a current copy of the relevant Record(s) of Title?

Yes

upload file:

Record of Title SA34B688 and Record of Title SA11C134.pdf was uploaded

Who are the registered legal land owner(s)?

Please write your answer here:

As noted above, the Northern Block Mining Project is located on:

• the land on Taharoa C Block to the north of the Mitiwai Stream (excluding the first mining pit in that block, called Pit 1) which is owned by the Proprietors of Taharoa C Block Incorporated Ltd (Taharoa C). Taharoa C is a Māori incorporation established under the Te Ture Whenua Māori Act 1993 and is comprised of members who whakapapa Ngāti Mahuta; and

• a small area of adjacent land called Taharoa A1C6 Block privately owned by the Kana Whanau.

Detail the nature of the applicant's legal interest (if any) in the land on which the project will occur

Please write your answer here:

TIL has an agreement to lease (and rights to mine) Taharoa C Block from Taharoa C. The lease is for 70 years with a 20-year right of renewal (with a final end date of 2062).

s 9(2)(b)(ii)

## Section 2: Project details

What is the project name?

Please write your answer here:

Northern Block Mining Project

What is the project summary?

Please write your answer here:

TIL estimates that there are over 21-29 million tonnes of extractable resource available in the Northern Block capable of generating s 9(2)(b)(ii).

TIL is seeking all necessary approvals required to extract this resource from the Northern Block for processing using the existing procedures and equipment from the wider Taharoa Mine Site.

The Northern Block Mining Project will involve the extraction of ironsand and transportation of it via temporary pipelines to the existing processing area on the Taharoa Mine, outside of the Project area. The necessary approvals include discretionary resource consents, an archaeological authority (if not already granted), and a Wildlife Act permit.

What are the project details?

Please write your answer here:

Purpose: The purpose of the Northern Block Mining Project is to secure the long-term future of Taharoa Mine by enabling TIL access to substantial additional ironsand resource and expand its mining operations. The Project will support the continued operation of the entire Taharoa Mine which has been operating for over 50 years. Taharoa Mine is New Zealand's largest onshore ironsand mine and its success is reflected in its longevity (operating for over 50 years) and the benefits it provides to tangata whenua, its employees, the Taharoa community, and the wider Waikato region.

Objectives:

(a) To efficiently obtain the necessary approvals for TIL to expand its existing mining operations for a term of 35 years.

- (b) To increase the resilience of the Taharoa Mine in recognition of its strategic importance. Having a larger operation and working area will provide the operation with greater resiliency against adverse events, including severe weather, and allow TIL to increase its resilience to ensure it can comfortably fulfill its long-term shipping contracts.
- (c) To enable the continued export of titanomagnetite product - an essential ingredient in the manufacture of steel, which is a vitally important engineering and construction material.
- (d) To enable national level economic benefits to continue through the payment of taxes on the extracted resource.
- (e) To enable TIL to Mine all of Taharoa C Block as anticipated under TIL's lease.
- (f) To provide a key source of income for Taharoa C, and its Ngāti Mahuta shareholders into the future. Ngāti Mahuta are tangata whenua and own the majority of the land on which the Mine operates (through Taharoa C), benefiting from a lease arrangement (that includes the Northern Block) and the key ownership stake they have had in TIL since 2017. Similarly, the Kana Whanau will benefit from royalties for use of their land. One of the objectives of the Project is therefore to ensure the Mine can continue to provide this income for members of the Ngāti Mahuta hapu and enable them to profit from their land.
- (g) To enable TIL to continue supporting Taharoa Village. TIL currently owns the majority of the houses in the Village which are used to provide housing at a low rental to TIL's employees and their families. TIL also funds the school, shop, community hall, two large sports facilities and the local marae and fire brigade. TIL also owns the majority of infrastructure and services that support the Village. The long term continuation of the Mine will ensure that TIL can continue to provide this financial support to the neighbouring Village, as further explained later in this application.

Activities involved: the mining process, and activities sought to be authorised as part of the Northern Block Mining Project include (but are not limited to):

- (a) removal of vegetation, topsoil and overburden using heavy vehicles (including the disturbance of potential lizard and bat habitat and the potential disturbance of archaeological sites);
- (b) the relocation of the existing 33 kv electricity line on the Northern Block;
- (c) the extraction of ironsand. This will typically involve dry mining using dry mining units attached to portable pre-processing plants but also by wet-mining in the future;
- (d) the pumping of ironsand via temporary pipelines to an already established processing area on another area of the Taharoa Mine in the Central Block (separately consented); and
- (e) tailings disposal and rehabilitation of mined areas.

The Project will need to rely on TIL's existing resource consents for the Central and Southern Blocks of the Mine (to take and use water from the Wainui Stream and to transport processed product from the processing facility through the ship-loading pipeline to the CMA). TIL is in the process of replacing these consents. TIL will need to seek a change to these resource consents to enable the Project and will do that either as part of this Project or separately.

Describe the staging of the project, including the nature and timing of the staging

Please write your answer here:

Mining in the Northern Block is proposed to occur sequentially in several different cells (known as 'pits') across the term of the relevant resource consents.

What are the details of the regime under which approval is being sought?

Please write your answer here:

Resource consents for land disturbance and discharges are required under the Resource Management Act 1991 (RMA), an archaeological authority is required under the Heritage New Zealand Pouhere Taonga Act 2014 (HNZPT), and approval is sought under the Wildlife Act 1953 to capture and relocate lizards and bats if they are identified prior to vegetation removal.

If you seeking approval under the Resource Management Act, who are the relevant local authorities?

Please write your answer here:

Waikato Regional Council  
Waitomo District Council

What applications have you already made for approvals on the same or a similar project?

Please write your answer here:

There are no existing resource consents held by TIL for mining of the Northern Block as defined above.

TIL has separately sought resource consents to mine Pit 1 on the Northern Block and establish a suitable crossing over the Mitiwai Stream to access Pit 1 and the Northern Block.

As previously noted, the Project will need to rely on TIL's existing resource consents for the Central and Southern Blocks of the Mine (to take and use water from the Wainui Stream and to transport processed product from the processing facility through the ship-loading pipeline to the CMA). TIL is in the process of replacing these consents. TIL will need to seek a change to these resource consents to enable the Project and will do that either as part of this Project or separately.

Is approval required for the project by someone other than the applicant?

No

Please explain your answer here:

N/A

If the approval(s) are granted, when do you anticipate construction activities will begin, and be completed?

Please write your answer here:

If granted, TIL will begin work as soon as possible and within 6 months of the consents being granted.

### Section 3: Consultation

Who are the persons affected by the project?

Please write your answer here:

Parties potentially affected by the Project may include:

- Taharoa C (landowner)
- Te Ruunanga o Ngāti Mahuta ki te Hauaaruru Charitable Trust (as representatives of other Ngāti Mahuta)
- Maketuu Marae, Aaruka Marae and Te Kooraha Marae (being the three local Marae)
- Maniapoto Māori Trust Board now Te Nehenehenui (the post-governance settlement entity for Ngāti Maniapoto)
- Waikato-Tainui
- Adjacent landowners including the Tukotahi Tuteao Whanau Trust, the Māori Trustee, David John Keepa Kupa Whanau Trust, the Kana Whanau and the Wetini Whanau.
- Taharoa Lakes Trustees
- Department of Conservation
- HarbourMaster
- Waikato Regional Council
- Applicant groups under the Marine and Coastal (Takutai Moana) Act 2011

Detail all consultation undertaken with the persons referred to above. Include a statement explaining how engagement has informed the project.

Please write your answer here:

TIL undertakes ongoing informal engagement with adjacent landowners, the Taharoa Village, DOC, and local Ngāti Mahuta in relation to its existing mining operations. This is in relation to the management of the mine, upcoming consent applications and any issues that have arisen. TIL has an open-door policy, is strongly tied to the small, local community, and engages with interested parties on a day-to-day basis. If issues arise that affect stakeholders, TIL considers how those issues can be addressed, and if appropriate, adjustments are made to operations. This open approach to consultation will continue in respect of the Northern Block Mining Project.

TIL has started initial consultation in relation to the Project, primarily through informal consultation with adjacent landowners. It was these consultation meetings that lead to TIL reaching an agreement with the Kana Whanau to mine Taharoa A1C6 Block. The majority of the other parties listed above are aware of TIL's intention to apply to mine the Northern Block. TIL intends to further consult on the Project prior to submission of any application to an expert panel and will consider how the views of affected parties can inform the final design of the Project.

Upload file here:

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Describe any processes already undertaken under the Public Works Act 1981 in relation to the land or any part of the land on which the project will occur:

Please write your answer here:

N/A

### Section 4: Iwi authorities and Treaty settlements

What treaty settlements apply to the geographical location of the project?

Please write your answer here:

The land on which the Northern Block Mining Project will occur has not been confiscated by the Crown since the land was originally settled in approximately 1826.

A relevant statutory acknowledgement in Schedule 11 of the RMA has been made in favour of Ngāti Maniapoto arising from the Maniapoto Claims Settlement Act 2022. The statutory acknowledgement area is large and includes the Mitiwai Stream and the land on either side of it, as well as the wider Taharoa area and the Coastal Marine Area adjacent to Taharoa. The Settlement Act recognises that Ngā Wai o Maniapoto, including the coastal waters within the area of interest, have a deep historic, intellectual, physical, and spiritual significance to Ngāti Maniapoto.

Are there any Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019 principles or provisions that are relevant to the project?

No

If yes, what are they?:

Are there any identified parcels of Māori land within the project area, marae, and identified wāhi tapu?

Yes

If yes, what are they?:

There is an urupa in the Northern Block. TIL recognises the importance of this area and does not propose to affect it during its mining operations.

Is the project proposed on any land returned under a Treaty settlement or any identified Māori land described in the ineligibility criteria?

Yes

Has the applicant has secured the relevant landowners' consent?

Yes

Is the project proposed in any customary marine title area, protected customary rights area, or aquaculture settlement area declared under s 12 of the Māori Commercial Aquaculture Claims Settlement Act 2004 or identified within an individual iwi settlement?

No

If yes, what are they?:

Has there been an assessment of any effects of the activity on the exercise of a protected customary right?

No

If yes, please explain:

Upload your assessment if necessary:

No file uploaded

## Section 5: Adverse effects

What are the anticipated and known adverse effects of the project on the environment?

Please describe:

TIL has identified potential adverse effects of the Project on the environment and will seek to avoid, remedy or mitigate these effects. By way of example:

- The majority of tailings and associated water from mining of the Northern Blocks will be placed back on the Northern Block;
- Accidental discovery protocols will apply to the Project area;
- No water will be drained from the Mitiwai Stream catchment (all water will be taken under TIL's existing and separate consents);
- Mining will not occur within 100m of the mean high-water springs and 30m from perennial waterbodies, consistent with TIL's existing consents for the Central and Southern Block; and
- Rehabilitation will occur sequentially.

Please see further detailed in the Assessment of Environmental Effects attached.

Upload file:

Assessment of Environmental Effects Northern Block.pdf was uploaded

## Section 6: National policy statements and national environmental standards

What is the general assessment of the project in relation to any relevant national policy statement (including the New Zealand Coastal Policy Statement) and national environmental standard?

Please write your answer here:

Please see the Assessment of Environmental Effects attached.

File upload:

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## Section 7: Eligibility

Will access to the fast-track process enable the project to be processed in a more timely and cost-efficient way than under normal processes?

Yes

Please explain your answer here:

TIL expects that the fast-track consenting process will enable the Project to be processed in a more timely and cost efficient way than under normal processes because:

- In TIL's experience resource consenting processes under the RMA have been unwieldy, slow and unnecessarily resource intensive. It is currently facing significant challenges and ongoing delays in relation to the re-consenting of TIL's resource consents for the Central and Southern Blocks. It expects it will encounter the same experience with an application for all necessary resource consents for the Northern Mining Project.
- It is likely that an application under the RMA for all necessary resource consents for the Northern Block Mining Project would be limited notified and proceed to a council-level hearing, adding time and cost to the consenting process that could be avoided under the fast track process. WRC has limited notified TIL's resource consent applications to replace its existing resource consents for the Central and Southern Blocks and the application is set down for a hearing in August 2024, with submitters producing expert and non-expert evidence. WRC's approach to notification on this application suggests that it may also limited notify the Northern Block Project. Because TIL is currently seeking to replace its existing resource consents for the Central and Southern Block, this increases the interest in this application and potential for notification (regardless of whether this is justified from an effects perspective).
- Protracted litigation in respect of an application for all necessary resource consents for the Northern Block Mining Project is more likely under the RMA than under the fast track process. TIL considers there is a high risk that any decision on an application for the necessary resource consents under the RMA will be appealed to the Environment Court. This could mean the application will proceed to an initial council-level hearing and then potentially be subject to an Environment Court re-hearing. Again, this would add significant cost and time to the consenting process which could be entirely avoided under the fast track process which limits appeals to the High Court on points of law only (and avoids the Environment Court process). Protracted litigation does not recognise the significant and ongoing capital investment required to keep the Mine operational and certainly deters long term mine planning.
- The fast track process will enable TIL to obtain all necessary approvals to mine the Northern Block in one process, including an archaeological authority and Wildlife Act permit, if required, rather than having to obtain the necessary approvals through multiple processes (adding cost and potential delays to the Project if a particular process is delayed).
- The fast track process avoids the risk of interested parties appealing the archaeological authority as a basis for delaying TIL's mining operations. The archaeological authority process under the Heritage New Zealand Pouhere Taonga Act 2014 provides a right of appeal to the Environment Court against any decision to grant the authority. The effect of this is that opponents who have exhausted all opportunities to object to a project under the RMA may have a second chance to oppose it, notwithstanding that resource consent has been granted.

Ultimately the fast-track process is expected to deliver a faster and more cost-effective consenting process and provide TIL with commercial certainty regarding the long term future of the Mine sooner than would be possible under the standard consenting process, while still enabling the views of stakeholders to be taken into account.

What is the impact referring this project will have on the efficient operation of the fast-track process?

Please write your answer here:

The Project will not adversely impact the efficient operation of the fast-track process.

TIL's expert team will soon be commencing the preparation of a resource consent application for the Northern Block Mining Project. TIL intends for the application to be ready before or promptly after the new legislation takes effect, enabling the efficient use of the fast track process.

TIL has already sought resource consent to enable the development of an appropriate bridge crossing to allow for the movement of heavy vehicles over the Mitiwai Stream to provide access to the Northern Block. It is expected that this will be determined in the coming weeks.

TIL is ready to undertake the Project promptly after any approvals are granted – it is 'shovel ready' and would not inefficiently stand in the way of any other shovel ready projects seeking consideration under the new fast-track process.

Has the project been identified as a priority project in a:

Other

Please explain your answer here:

No. However, The Taharoa Mine is largest ironsands producer in New Zealand and has been identified as regionally significant mineral resource in the proposed Waitomo District Plan.

Will the project deliver regionally or nationally significant infrastructure?

Regional significant infrastructure

Please explain your answer here:

Yes.

The Mine is regionally significant infrastructure. TIL has invested over **s 9(2)(b)(ii)** in the Taharoa Mine's infrastructure, plant, and machinery to enable ironsand to be extracted and to secure the life of the Mine for at least another 30 years. Approximately **s 9(2)(b)(ii)** is invested per year into the Mine and its operations costs, and in the last year alone approximately **s 9(2)(b)(ii)** has been invested in new capital equipment. The Project will contribute to the on-going investment in critical Mine infrastructure.

Will the project:

increase the supply of housing, address housing needs

Please explain your answer here:

Yes.

Will the project deliver significant economic benefits?

Yes

Please explain your answer here:

The Northern Blocks Project will contribute to Taharoa Mine providing significant economic benefits.

The Northern Blocks Project will contribute billions to the national economy

Based on a conservative resource assessment, the Northern Block Mining Project will directly contribute approximately **s 9(2)(b)(ii)** to the New Zealand economy.

This includes approximately **s 9(2)(b)(ii)** which will be paid to local landowners.

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 for its current projects. This includes the supply of electricity and services including laundry, helicopter and other transport services TIL also relies on specialist sub-contractor support including the maintenance and management of specialised mine machinery and equipment. The support that TIL will rely on from surrounding centres for the Northern Block Project is estimated to inject at least **s 9(2)(b)(ii)** into the local economy and contribute billions to regional GDP.

The Northern Block Project is expected to contribute **\$s 9(2)(b)(ii)** in corporate taxes and **s 9(2)(b)(ii)** in income taxes for the remainder of its lifetime if renewals are granted.

Enabling the expansion of Taharoa Mine will ensure that Ngāti Mahuta hapu can continue to profit from their land while maintaining their role as kaitiaki

The land on which the Mine operates remains in Māori ownership through the conduit Taharoa C, an incorporation whose shareholders are Ngāti Mahuta.

The Mine provides Taharoa C with its primary form of income and has done since 1973. During the course of undertaking the Northern Block Mining Project (including the mining of Pit 1), Taharoa C will be paid **s 9(2)(b)(ii)** under TIL's lease agreement and the Kana Whanau will also benefit from a commercial arrangement.

The expansion of the Mine, into the Northern Block will therefore enable locals who whakapapa Ngāti Mahuta to continue profiting from their land.

The Northern Blocks Project will provide significant regional benefits through the provision of employment and payment of royalties to the landowners

Allowing the mining of the Northern Block will enhance the social and economic wellbeing of the people and community of Taharoa, the wider region.

The Mine provides employment opportunities for the community, particularly local Māori. In 2023, TIL directly employed 176 people, approximately 79% of which are local Ngāti Mahuta. Over 82% of income earned by local Ngāti Mahuta comes from employment at the Mine. Ngāti Mahuta also hold 63% of the skilled roles available at the Mine.

TIL has a core workforce of 170-180 people but employs upwards of 300 staff and contractors. TIL's employees receive generous benefits, including generous salaries and employment benefits and the opportunities for up-skilling and career development. TIL offers a 10% contribution towards superannuation, generous sick leave, subsidised healthcare, additional leave, and long service leave allocations to further support employees, as well as subsidised medical, life, and health disability schemes. TIL provides housing for its employees and their families in the Village. TIL owns 75 houses and rents them to employees at a heavily discounted rate of **s 9(2)(b)(ii)**. TIL also provides opportunities for up-skilling and career development. TIL also offers employment for the local contractors driving the local bus or undertaking maintenance on the Village infrastructure and housing that TIL owns and funds.

The Northern Block Mining Project will help to ensure these benefits continue. TIL estimates that the mining of the Northern Blocks (including Pit 1) will deliver over **s 9(2)(b)(ii)** in wages and salaries for the lifetime of the Northern Blocks projects.

The Northern Block Project will ensure the continued survival of Taharoa Village

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 it makes every year.

These benefits include:

(a) TIL's ownership and maintenance of the community hall, school, shop, two large sports facilities, a local marae and the fire brigade in the Taharoa Village.

(b) TIL provides the majority of the Village's essential services including water and sewage services that cost approximately \$s 9(2)(b)(ii) annually which is anticipated to increase to over s 9(2)(b)(ii) to comply with new clean water regulations.

(c) Additional forms of support include the provision of local rubbish collection, a local bus service, subsidised freight serves, access to the Mine's petrol and diesel supplies for the local community, and an annual education payment for employee's high school aged children.

(d) TIL also funds other incidental maintenance such as lawn mowing and gardening.

The Northern Block Mining Project will help to ensure these benefits continue.

Will the project support primary industries, including aquaculture?

No

Please explain your answer here:

Will the project support development of natural resources, including minerals and petroleum?

Yes

Please explain your answer here:

Yes.

The Northern Block Mining Project will support the development of New Zealand's iron sand mining industry and TIL's export capacity.

TIL has generated s 9(2)(b)(ii) in export sales since 2017, with plans to grow substantially over the next 30 years through projects such as this which will support the development of New Zealand's iron sand mining industry and TIL's export capacity. TIL estimates that there is over s 9(2)(b)(ii) of resource available in the remainder of site which can be extracted.

Will the project support climate change mitigation, including the reduction or removal of greenhouse gas emissions?

Yes

Please explain your answer here:

Will the project support adaptation, resilience, and recovery from natural hazards?

No

Please explain your answer here:

N/A

Will the project address significant environmental issues?

Yes

Please explain your answer here:

Yes.

All actual and potential environmental effects of the proposed activities can either be avoided or mitigated to minor levels through the proposed management plans or imposed consent conditions.

Please see further assessment in the Assessment of Environmental Effects attached.

Is the project consistent with local or regional planning documents, including spatial strategies?

Not Answered

Please explain your answer here:

Yes.

The activities for which consents are sought have been assessed to display a high level of consistency with the relevant objectives and policies of the New Zealand Coastal Policy Statement, the Waikato Regional Policy Statement, and the Waikato Regional Coastal Plan, and both the Waikato-Tainui and Ngāti Maniapoto Iwi Environmental Plans. There is no relevant spatial strategy. Please see further assessment in the Assessment of Environmental Effects attached.



Anything else?

Please write your answer here:

N/A

Does the project includes an activity which would make it ineligible?

No

If yes, please explain:

## Section 8: Climate change and natural hazards

Will the project be affected by climate change and natural hazards?

No

If yes, please explain:

N/A

## Section 9: Track record

Please add a summary of all compliance and/or enforcement actions taken against the applicant by any entity with enforcement powers under the Acts referred to in the Bill, and the outcome of those actions.

Please write your answer here:

TIL has been subject to some compliance and/or enforcement action. This is explained below along with confirmation that the matter has been resolved or an update on the current status.

(a) TIL was convicted of an offence in 2017 under the RMA for the discharge of diesel into the Wainui Stream. The District Court decision notes that during the process of fixing a faulty generator, a contractor reconnected the generator without being told that the on/off valve was on. This caused diesel to spill and migrate overland into the stormwater network. An interceptor has been installed to reduce the risk of spills.

(b) TIL has been charged with the discharge of sediment laden water to land which may enter water following the cyclone events in January 2023. This matter is currently before the Court. TIL regrets that this incident has resulted in a prosecution and has taken proactive steps to ensure this incident does not occur again.

(c) In 2024 TIL was issued an abatement notice in relation to a one-off discharge of dust in December 2023 which was considered by the Council to be offensive and objectionable. TIL is complying with the abatement notice and has taken steps to minimise the potential for offensive and objectionable dust as far as possible. It has prepared an interim dust management programme to manage dust (while a longer term plan is being developed as part of the Project) and it is in the process of implementing the programme.

These enforcement matters relate to the mining of the Central and Southern Blocks and do not relate to any part of the Northern Block.

TIL is committed to ensuring that its operations comply with all regulatory requirements, and it has systems and processes in place to ensure compliance on an on-going basis.

Load your file here:

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## Declaration

Do you acknowledge your submission will be published on environment.govt.nz if required

Yes

By typing your name in the field below you are electronically signing this application form and certifying the information given in this application is true and correct.

Please write your name here:

Stephanie de Groot

Important notes