

Response ID ANON-URZ4-5FN8-P

Submitted to Fast-track approval applications
Submitted on 2024-05-03 19:47:24

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 with the Records of Title marked Figure 1). 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.

The Project relates to the Central and Southern Blocks (Central and Southern Block Mining Project) of Taharoa Mine.

The Central & Southern Mining Project Area is approximately 911 ha and includes a shiploading pipeline and mooring buoy at the end of the pipeline in the coastal marine area, Port Taharoa (CMA).

File upload:

Central and Southern Block Mining Project Site Plan.pdf was uploaded

Upload file here:

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

Yes

upload file:

CT SA34B_688 - title for Taharoa C Block(20094925.1).pdf was uploaded

Who are the registered legal land owner(s)?

Please write your answer here:

Yes, see attached.

Legal description: Taharoa C Block.

Certificate of Title reference: SA34B/688.

Ngāti Mahuta are tangata whenua and own the Central and Southern Block Mining Project land through the conduit 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.

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) the Central and Southern Block Mining Project with the landowner. The lease is for 70 years with a 20-year right of renewal (with a final end date of 2062).

Section 2: Project details

What is the project name?

Please write your answer here:

Central and Southern Block Mining Project

What is the project summary?

Please write your answer here:

The Taharoa Ironsand Mine has been operating since 1973. It was first operated by New Zealand Steel Mining limited, which now trades as TIL. At the time the Mine was established, NZSML was wholly-owned by the New Zealand government. The current owners acquired TIL from Bluescope in 2017.

TIL is seeking to continue its existing ironsand mining activities in the Central and Southern Block Mining Project for the next 35 years, including the extraction, concentration, processing and ship loading of titanomagnetite product – using both dry and wet-mining techniques. The extracted ironsand ore is exported as an essential ingredient in the manufacture of steel.

The Central and Southern Block Mining Project requires resource consents for the taking of ironsand and associated land disturbance, water take, discharges, groundwater diversion, ship-loading activities and the use of existing infrastructure within the site and the adjacent CMA. The resource consents required will replace TIL's existing resource consents for the Central and Southern Blocks. TIL also seeks Wildlife Act permits (if required).

What are the project details?

Please write your answer here:

Purpose: To enable the Taharoa Ironsand Mine to continue operating and continue its significant contribution to the regional and national economy. 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 authorise the continued operation of the existing Mine for the next 35 years.
- (b) To enable the future expansion of TIL's mining activities. Authorising the processing of ironsand as part of this Project will enable expansion because the processing plant will be based within the Central and Southern Block Mining Project with opportunities to expand the mine around the Central and Southern Block Mining Project in the near future.
- (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 provide a key source of income for Taharoa C, and its Ngāti Mahuta shareholders, into the future. Ngāti Mahuta are key beneficiaries of the Mine's operation and have been since its inception. Ngāti Mahuta are tangata whenua and own the land on which the Mine operates (through Taharoa C), benefiting from a lease arrangement and the key ownership stake they have had in TIL since 2017. 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.
- (f) 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 continuation of the Central and Southern Block Mining Project 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 within the Central and Southern Blocks of the Mine generally involves the following process:

- removal of vegetation, topsoil and overburden (which may require a permit under the Wildlife Act);
- the extraction and processing of ironsand (by dry mining and wet-mining techniques);
- the mixing of iron sand with water to form a slurry for transport and processing;
- pumping of the slurry through a seabed pipeline to a bulk carrier ship moored offshore (at TIL's mooring buoy);
- ship-loading and dewatering; and
- tailings disposal and rehabilitation of mined areas.

TIL is currently undertaking these activities in accordance with a suite of regional resource consents held by TIL, granted in 2006. These consents expired in December 2020 and TIL has applied (within 3-6 months of their expiry) for all necessary resource consents to replace the expired consents and continue operations within the Central and Southern Blocks (i.e. the Central and Southern Mining Project).

The activities sought to be authorised as part of the Central and Southern Block Mining Project more particularly include:

- (a) extracting ironsand material using dry and wet-mining techniques, and associated land preparation works prior to extraction;
- (b) the processing of extracted ironsand material;
- (c) transporting raw and processed material around the Mine site and to the ship loading buoy for export;
- (d) damming and diverting a stream for the purposes of creating a water supply reservoir and to place a rock weir in the stream.
- (e) taking and using water from a reservoir created by the dam or from dredge ponds during wet mining.
- (f) discharging mine overburden onto land (for rehabilitation) and discharging process water into the ground as a result of mining operations.
- (g) discharging ironsand slurry, stormwater and process wastewater into the CMA.
- (h) discharging settled stormwater and washdown water into the Wainui Stream.
- (i) operating, maintaining, using and replacing an existing pipeline and mooring buoy in the CMA.

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

Please write your answer here:

If the Central and Southern Block Mining Project is approved, mining will continue in the northern part of the Project Area called the Te Ake Ake Block for approximately five years. Mining activity will then progress throughout the Central Block and then the Southern Block for the remainder of 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 are required under the Resource Management Act 1991 (RMA) and approvals may be required 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

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

Please write your answer here:

As further explained below, TIL has made an application to Waikato Regional Council for all necessary resource consents to replace its existing (now expired) resource consents for the Central and Southern Mining Project.

TIL's preference is for the application / the Central and Southern Mining Project to be considered under the Fast-Track Approvals Bill rather than under

the standard consenting process under the RMA. TIL has made a submission on the Fast-Track Approvals Bill to ensure it can continue to rely on its existing resource consents for the Central and Southern Blocks while approvals are sought for the Central and Southern Mining Project under the Bill.

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 the approvals are granted, TIL intends to continue its existing mining operation for the duration of the approvals.

Section 3: Consultation

Who are the persons affected by the project?

Please write your answer here:

Parties potentially affected by the Project 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
- Tukotahi Tuteao Whanau Trust (adjacent landowner)
- Te Huia Pihopa Trust (adjacent landowner)
- David John Keepa Kupa Whanau Trust (adjacent landowner)
- The Kana Whanau (adjacent landowner)
- The Wetini Whanau (adjacent landowner)
- Taharoa Lakes Trustees
- Department of Conservation
- Harbour Master for the Port of Taharoa
- 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:

Ongoing engagement occurs with Taharoa C through their ownership stake in TIL and under the lease arrangement with TIL. The Project is consistent with the aspirations of Taharoa C for the use of the land.

TIL has established consultation and engagement processes with both Ngati Mahuta, DOC, the Taharoa Lake Trustees and different collectives made up of various interest groups and stakeholders. Consultation regarding TIL's on-going mining operations (including the Project) occurs in a range of forms:

- (a) Formal meetings: These have been ongoing (in accordance with TIL's existing resource consent conditions). At the last meeting in April 2023, representatives from the three local Marae attended along with the Trustees of the Taharoa Lakes Trust and the David John Keepa Kupa Whanau Trust.
- (b) Informal on-going engagement: TIL undertakes ongoing informal engagement with adjacent landowners, the Taharoa Village, DOC, and local Ngāti Mahuta. 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 (which form part of the Project).
- (c) Notification to Marine and Coastal Area (Takutai Moana) Act 2011 applicants : Prior to the lodgement of the application for the Central and Southern Block Mining Project in 2020, TIL sought the views of those who had made an application for recognition of customary or marine title or applied to enter negotiations in accordance with s 103 of the Marine and Coastal Area (Takutai Moana) Act 2011. No responses were received and accordingly no adjustments were made to TIL's on-going mining operations (including the Project).
- (d) Notification to affected parties: TIL's application for the Project lodged with Waikato Regional Council was limited notified to immediately adjacent landowners, DOC, the Taharoa Lake Trustees, Te Ruunanga o Ngāti Mahuta ki te Hauaaruru Charitable Trust, Te Nehenehenui and Waikato-Tainui . TIL has made changes to its application, primarily proposed conditions of consent, to address matters raised in submissions lodged by notified parties and WRC.
- (e) Direct engagement with adjacent landowners: TIL has been engaging directly with adjacent landowners including the Kana Whanau and Wetini

Whanau. As a result, the Kana Whanau has withdrawn its submission on the application.

(f) Direct engagement with Harbour Master: TIL engaged with the Harbour Master in 2020 about the existing application for the Project lodged with Waikato Regional Council, specifically TIL's ship loading activities. The Harbour Master raised no issues with TIL's on-going operations.

Further consultation would be undertaken if the Project is directly referred to the fast-track process to ensure that updated views have been appropriately provided and addressed in any application.

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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 that is subject to the Central and Southern Block Mining Project has never been confiscated by the Crown since the land was originally settled in approximately 1826.

The coastal marine area adjacent to the Mine, and including TIL's existing shiploading pipeline and mooring buoy are within the Ngāti Maniapoto statutory acknowledgment area, under the Maniapoto Claims Settlement Act 2022. 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.

The Central and Southern Block Mining Project seeks to reauthorise the shiploading pipeline and mooring buoy which have been in this environment for over 50 years. Advice from an expert marine ecologist in relation to the effects of the Central and Southern Block Mining Project has indicated that there are likely to be greater adverse effects in removing the pipeline from the benthic environment than its continued operations. This advice also indicates that the effects of ship-loading discharges and process and stormwater discharges are no more than minor.

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?:

As explained above, the Central and Southern Block Mining Project Area is Māori owned freehold land. It contains various areas Māori reserves / wāhi tapu areas shown in the Site Plans enclosed with this application. These areas are identified and fenced off to avoid any effects on these areas.

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 engaged a range of expert consultants to assess the environmental effects of the Project. The experts have formed the following conclusions:

Dr Edward Beetham, coastal processes expert at T&T, has concluded that the potential effects on coastal processes associated with the proposed activities in the CMA will be negligible.

Dr Peter Wilson, Marine Ecologist at SLR Consulting, has concluded that the potential effects:

- (a) on the benthic environment of the occupation of the CMA by the pipeline and mooring buoy on benthic ecology is low.
- (b) of constructing the pipeline and mooring buoy anchors and the permanent space they occupy on the seabed is low.
- (c) of ship-loading discharges on the marine environment (considering the contribution of contaminants and the deposition of fine sediment on benthic habitats) is likely to cause no greater than a low level
- (d) on the marine environment of the discharge of process and stormwater discharges to the CMA on the marine environment are no more than low.

Cawthron concludes that existing effects on marine mammals are less than minor to nil and this is likely to remain the same if ship loading is increased.

Mr Hamish Dean, terrestrial ecologist at SLR, concludes that the potential adverse ecological effects (on vegetation and wetlands) can be managed and that proposed consent conditions will provide an acceptable level of protection to ecological values at the site.

Dr Hannah Mueller, terrestrial ecologist engaged by SLR, concludes that the effects on bats, avifauna, herpetofauna and kaitipo following mitigation are low.

Dr Keren Bennett, Principal Ecologist at SLR, concludes that the potential adverse effects:

- (a) of the dam on the upstream migration of juvenile native fish are very low, provided that the fish pass is maintained.
 - (b) of the dam on the downstream migration of juvenile native fish have been adequately addressed through the Proposed Consent Conditions.
- Cameron Lines, Baseline Geotechnical Ltd, concludes that the risk of slope stability (and therefore the potential for adverse environmental effects resulting from that instability) can be considered negligible.
- Andrew Curtis, PDP, recommends a range of mitigation measures to reduce the potential for off-site objectionable effects to occur and ensure compliance with permitted activity conditions. Although there remains the potential for occasional off-site effects due to the exposed coastal nature of the site (which would occur with or without TIL's mining operation), it is extremely unlikely that any off-site discharges will have any adverse human health effects.

Jonathan Williamson, Director of Williamson Land and Water Advisory, has concluded that the hydrological effects of wet-mining near the Mitiwai Stream will be appropriately mitigated. Dr Bennett has also indicated that the freshwater ecology effects can also be appropriately managed through consent conditions. TIL has otherwise only proposed wet-mining on the Central Block until further information is gathered about the effects of wet-mining on small lakes adjacent to the Southern Block.

Please see a more detailed summary in the Assessment of Environmental Effects attached.

Upload file:

Assessment of Environmental Effects Central and Southern.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:

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 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:

In 2020 TIL applied for all necessary resource consents to enable its mining operations within the Central and Southern Block (i.e. the Project) to continue. This Project is complex; this is due to its scale, the environmental context, the range of potential environment effects that have been assessed, the period of time that has passed since the application was made and various the legal issues involved in the reconsenting of the Mine.

TIL has experienced significant challenges and on-going delays with the consenting process. It has been a frustratingly slow process and has presented significant barriers to TIL's ongoing investment and growth. There have been a number of factors that have contributed to a delay in the application being determined, most notably on-going requests for further information which continue to this day. The application was limited notified, the Council report has been issued and primary evidence by submitters was exchanged. A hearing was scheduled for February but has since been adjourned until August 2024 to enable further evidence to be exchanged to fulfil additional information requests from the Hearing Panel and to enable more time for the hearing.

In TIL's view the Central and Southern Block Mining Project will be processed in a more timely and cost efficient way if it proceeds via the fast-track process.

TIL is therefore considering placing its application on hold under the RMA, either in anticipation of the Project being identified as a Project to be directly referred under the Fast-Track Approvals Bill or after directly referred projects have been confirmed. It would then pursue the Project under the fast-track process, instead of under the RMA.

TIL considers that the fast track consenting process is more timely and cost efficient than the standard RMA process for the two key reasons set out below.

In pursuing the applications through the fast track process, TIL would also be able to consolidate the information provided to date into a more straightforward package of information for consideration.

The fast-track process will limit the potential for on-going litigation in respect of the Project

TIL considers there is a high risk that WRC's decision in respect of the existing resource consent application for the Central and Southern Blocks (for the Project) will be appealed to the Environment Court (either by a submitter or by TIL). The Environment Court may hear the application de novo (afresh), adding further significant delay and cost to the consenting process. If the decision were to be appealed to the Environment Court, then a decision may not be available from the Court until late 2025 (if not beyond). That decision could then be appealed to the High Court on a point of law.

Protracted litigation does not provide TIL with commercial certainty in relation to the future of the Mine and does not recognise the significant and ongoing capital investment required to keep the mine operational. It certainly deters significant investment in the mine and in the nearby village. By comparison, the fast-track process limits appeal rights to the High Court on a point of law only (skipping appeals to the Environment Court). This will likely truncate the consenting process and will help to avoid protracted litigation and deliver a consenting outcome in a more timely and more cost effective manner.

Overall, in TIL's view the fast-track process will enable the more timely and efficient consideration of TIL's consent applications while still enabling the relevant parties to be involved but in a more streamlined and productive manner.

The fast-track process will ensure that TIL is granted all necessary approvals to authorise its continued operation of Taharoa Mine

TIL is currently working through a technical scope issue in respect of its existing resource consent application for the Central and Southern Blocks / the Project.

The Hearing Panel has queried whether TIL's application includes scope for all necessary resource consents to be granted for its proposed future wet mining activities (an activity that has a long history of occurring at the Mine). TIL considers its application provides scope. The Council disagrees and considers an additional application is required.

If the Hearing Panel were to decide that it cannot grant consent for this activity (and this decision were upheld through any appeals). TIL would be required to cease wet mining activities until a further resource consent application was made and granted (likely sometime in late 2025). This provides no commercial certainty and is not time or cost effective.

Proceeding via the fast-track process will enable TIL to consolidate and clarify its application to avoid this costly scenario which could result in the shut-down of the mine.

The fast-track process will also enable TIL to obtain Wildlife Act approval (if required), which aids to the overall consenting efficiency (both in time and cost) for the Project.

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.

The resource consent application for the Project has already been prepared, tested by the Council and submitters, and has been refined with various legal and other issues already worked-through. The relevant consenting documents will be consolidated but are otherwise ready to be lodged and considered efficiently through the process. The Central and Southern Block Mining Project therefore supports the efficient operation of the process.

TIL is already undertaking activities in the Central and Southern Blocks that the Project is intended to re-consent / continue – it is therefore ‘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.

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 which has regional and national significance.

Will the project:

increase the supply of housing, address housing needs

Please explain your answer here:

Yes, TIL owns most of the houses in the Taharoa Village which it offers to its employees and their families for minimal rent, and provides other infrastructure and support to the local Taharoa Village. The Project will enable this investment to continue.

Will the project deliver significant economic benefits?

Not Answered

Please explain your answer here:

Yes. The Central and Southern Block Mining Project will deliver significant economic benefits.

The Central and Southern Block Mining Project provides significant regional and national economic benefits

Based on a conservative resource assessment the Central and Southern Block Mining Project will directly contribute **s 9(2)(b)(ii)** to the New Zealand economy (including to the landowners).

The Central and Southern Block Mining 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 the project is authorised.

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. 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 TIL relies on from surrounding centres for the Central and Southern Block Mining Project will inject at least **s 9(2)(b)(ii)** into the local economy over the life of the consents sought for the Project.

The Central and Southern Block Mining Project supports Māori business is the primary source of income for the Māori landowners

The land on which the Mine operates remains in Māori ownership and its revenue is, and continues to be, Taharoa C’s principal source of income and has been since 1972. As noted above, Ngāti Mahuta are tangata whenua and own the Central and Southern Block Mining Project land through the conduit Taharoa C.

Through the Central and Southern Block Mining Project, Taharoa C receives a royalty for the extracted material of approximately **s 9(2)(b)(ii)** per annum under its lease agreement. Without the mine, the Central and Southern Block Mining Project is on a virtually uninhabitable stretch of the west coast of the North Island, in an area exposed to extreme westerly winds with limited other uses.

Taharoa C also has a key ownership stake in TIL and have oversight of the operation of the Mine.

The Central and Southern Block Mining Project provides employment to those in the remote Taharoa area who would otherwise have limited local employment opportunities

The Mine provides 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. In 2023, TIL directly employed 176 people approximately 80% of which are local Ngāti Mahuta. Ngāti Mahuta also hold 63% of the skilled roles available at the Mine.

TIL has a core workforce of 70-80 people but employs upwards of 300 staff and contractors. TIL's employees receive generous benefits, including generous salaries and employment benefits TIL offers a **s 9(2)(b)** 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.

TIL estimates that the Central and Southern Block Mining Project will deliver over **s 9(2)(b)(ii)** in wages and salaries over the lifetime of the consents, if the renewal is granted.

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.

If the Central and Southern Blocks Mining Project is not authorised, then the Mine will be required to close, and these benefits will be lost.

The Central and Southern Block Mining 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 Central and Southern Mining Project will help to ensure these benefits continue. Without the necessary resource consents for the Project, TIL will need to close the Mine and will not be in a position to continue to support the Village.

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:

The Central and Southern 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 project such as this which will support the development of New Zealand's iron sand mining industry and TIL's export capacity.

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

Yes

Please explain your answer here:

TIL has recently invested **s 9(2)(b)(ii)** in a decarbonisation project to reduce the emissions generated by the mining operation as far as possible and to become almost 100% reliant on renewable electricity in the next 1-2 years. This will involve replacing the Mine's reliance on fossil fuels.

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

Yes

Please explain your answer here:

N/A.

Will the project address significant environmental issues?

Not Answered

Please explain your answer here:

Yes. All actual and potential environmental effects of the proposed activities can either be avoided or mitigated to acceptable levels through the proposed management plans or imposed consent conditions. The Project will not result in significant environmental effects.

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

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

Yes

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 Plan, 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 summary assessment in the Assessment of Environmental Effects attached.

Anything else?

Please write your answer here:

No

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:

No

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 following the accidental discharge of diesel into the stormwater network during maintenance works. In its sentencing decision, the District Court noted that during the process of fixing a faulty generator, a contractor reconnected the generator without realising that the on/off valve was on. 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. An abatement notice was also issued in relation to this event. 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.

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.

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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