

# Access Arrangement Variation Report

**Attention:** Mark Davies, Operations Director

**From:** Judi Brennan, Permissions Hokitika

**Applicant/Permit Holder:** Buller Coal Limited

**Minerals Permit Number:** MP 51279

**Permissions Record Number:** 37873-AA-V5

The purpose of this Report is to provide an analysis of the Access Arrangement variation application within the context of the relevant legislation, statutory planning framework and actual and potential effects so that the Decision-Maker can consider the Application and make a decision as to whether it should be granted or declined.

This report relates to the consideration of an Access Arrangement (AA) Variation application from Buller Coal Limited (BCL), the permit holder, who is seeking to extend the term and amend the timing schedule for compensation payments with regard to their existing (varied) AA (37873 AA-V4) for their Escarpment Mine operation, located on the Denniston Plateau.

## 1.0 Background to Access Arrangement Approved

- 1.1 On 21 May 2013, BCL was granted an AA within Mining Permit (MP) 51279 by the then Minister of Conservation, Hon Nick Smith, authorising open cast coal mining at the Escarpment Mine located on the Denniston Plateau, Buller/Kawatiri District. The activities approved by the AA can be summarised as:
  - To undertake opencast coal mining and rehabilitation activities within 106ha of public conservation land, for a nine-year period.
  - Construct (and use) the mine elements as shown in the Fourth Schedule of the AA granted.
- 1.2 The initial AA approved was subsequently varied on 22 May 2014 and 23 October 2015 primarily to change management plan naming conventions, update water quality compliance and monitoring conditions to be consistent with the Resource Consents granted and to make a number of administrative changes for clarity and consistency.
- 1.3 A further two variations were granted in June 2018 and June 2021 (V3 and V4) to the compensation schedule to better reflect the progress of mine disturbance and accommodate the extended mine life, due to slower than expected extraction rates. The total amount of compensation to be paid has not been amended.
- 1.4 The existing AA [DOC-1319640](#) contains a set of 129 standard and special conditions put in place as safeguards to protect conservation values and manage/mitigate the impacts of the operations, along with a number of associated schedules (to the AA) for Environmental Management, Reporting and Auditing; Mining Elements and Mine Plan clarification; Compensation Deed, Management Plans required and Mine Site Closure criteria.

- ✓ 1.5 Construction activities commenced in July 2014 after the issuance of the first AEO with limited operations undertaken before the mine was placed into care and maintenance on 1 May 2016. The sharp downturn in the coal export market made it uneconomic at that time to continue production at the mine.
- ✓ 1.6 A small amount of low-quality coal was incidentally won by BCL in the early years however the mine has remained in care and maintenance since 2016 with no further overburden removal or coal extracted since this time. Ongoing works on site have been limited to water management, weed control, infrastructure maintenance, removal of previously mined coal, water and biodiversity monitoring.
- ✓ 1.7 Current approvals for the Escarpment Mine start to expire from June 2022 and renewal of most of these (including the Minerals Permit, AA and primary Resource Consent) is required to continue with development and mining at the Escarpment Mine.
- ✓ 1.8 BCL have signalled that they will be looking to commence mining operations later this year (2022).

#### Information about the applicant:

- 1.9 Buller Coal Limited (BCL) is a wholly owned subsidiary company of Bathurst Resources Limited. Bathurst Resources Limited is a New Zealand registered company who also own New Brighton Collieries Limited, Bathurst Coal Limited and have a 65% share in BT Mining Limited.
- 1.10 Bathurst Resources Limited is New Zealand's leading coal producing company with operations throughout New Zealand providing coal for local steel making, delivering energy for electrical generation and to domestic dairy and food processing industries, and exporting high quality metallurgical coal to international customers.
- 1.11 Bathurst Resources Limited (Bathurst) has a good working relationship with the Department of Conservation and New Zealand Petroleum and Minerals (NZPA&M); and have held several Minerals Permits and Access Arrangements along with other Department concessions. There are no known compliance issues with their operations or outstanding invoices at this time.
- 1.12 Establishment of the joint venture with Talleys Energy Limited in 2016 and the subsequent purchase of the Stockton Mine assets (through BT Mining Ltd) in 2017 have created opportunities to utilise the Stockton infrastructure assets. According to Bathurst, this removes the need to establish a separate coal processing plant and rail facility to process the Escarpment coal.

#### Location/Site:

- 1.13 MP 51279 (The Escarpment Mine) is located on the southern edge of the Denniston Plateau, approximately 13 kilometres (km) northeast of Westport and 4km to the south of Denniston. The land is Crown Land administered by the Department of Conservation and is within the Mount Rochfort Conservation Area. The MP itself covers 199.2 ha while the AA authorises 106ha of the land they wish to mine.

#### 2.0 Summary of Variation application

- 2.1 The permit holder BCL, has applied for an extension of term for twenty (20) years extending the current expiry of the AA from 23 June 2022 until 23 June 2042 to align with the extension of duration (EOD) for the Mining Permit that has been lodged with NZPA&M. The EOD application is seeking to extend the term for another 20 years.
- 2.2 BCL proposes that clause 44 of the Access Arrangement is amended to read:

(a) Subject to Conditions 9(c) and (d), the term of this Access Arrangement will be for a period from the date of execution of this Access Arrangement until 23 June ~~2022~~ 2042 or for the term of the Mining Permit 51-279, whichever is the lesser.

(b) The parties acknowledge that within this term it is envisaged that the Permit holder will undertake Mining, Mining Operations, and progressive rehabilitation. ~~over an initial 7 year period, with the balance of the term being utilised for rehabilitation works and aftercare only. However nothing in this clause 43(b) limits or restricts the period when the Permit holder may undertake any Mining and Mining Operations.~~

- 2.3 BCL are also seeking to vary the schedule of compensation payments (Fifth Schedule of the AA) by extending the period over which the compensation is to be paid. BCL advises that the revised schedule has been developed in consultation with the Department and according to the applicant, enables the compensation funded projects to continue. The historic section of the compensation package remains unchanged as it is anticipated that this will be fully paid by the end of the 2022/23 financial year.
- 2.4 Overall, BCL's intent is to match compensation to disturbance whilst recognising a minimum \$802,000 annual payment.

### 3.0 Information available for consideration

#### Information received:

- 3.1 The variation application was received by the Department on 22 December 2021 and contained the request with associated documents in support. ✓

#### Requested information:

- 3.2 Further information was sought from the permit holder in order to better understand the justification for requesting a 20-year term extension. BCL provided the following additional information in April 2022 to satisfy the further information request, noting specifically in relation to the 20 year term extension: ✓

- The term of the AA is linked to Minerals Permit MP 51279, both of which expire on 23 June 2023. The MP remains legally in force until a decision is made (by NZP&M) on the application to extend its term.
  - Whilst the mine plan anticipates a minimum three to four year mine life within the currently approved AA footprint, this timeframe may need to be extended depending on coal price, blending options and external uncertainties.
  - Options that will require consenting to extend the life of mining export quality coking coal on the Buller Plateau are being considered. These options, if approved, will require access to the Escarpment Mine for a considerable period of time beyond the Escarpment mine life.
  - Up to 20 years access is required for the Escarpment to enable mining and rehabilitation and site closure to be completed without the need for some form of further authorisation for access.
  - A revised mine plan with supporting information will be submitted for approval within the next 6 months.
- Noted

#### 4.0 Conservation values, effects on values, and measures proposed to safeguard potential adverse effects

4.1 All conservation values and potential adverse effects of the mining activity and all other associated aspects were well considered, evaluated and discussed in the original AA report ([DOC-1319640](#)) informing the decision to grant access.

4.2 The overall conclusion of the decision report was that the proposed mining activities would result in significant adverse effects on natural and historic resources, some of which could be safeguarded against. The standard and special conditions (129) imposed in the AA granted for the proposed coal mining activities and the extensive compensation proposed would avoid or mitigate most notable adverse effects on conservation values.

4.3 Extending the term of the AA would not result in a material change or increase any adverse effects, except their duration, on conservation values as there is no increase in the scale of activities taking place, or any additional works proposed. The term extension simply extends the timeframe over which the previously authorised works would occur.

4.4 The proposed variation to the compensation schedule would not have any material bearing on the mining operations or effects on conservation values at the mine site itself.

#### Conclusion

4.5 An extension of term will by nature allow the mining activities as already considered and authorised to be undertaken within the 106 ha of public conservation land. There are no further adverse effects arising from the term extension however extending the term beyond 10 years must be given due consideration and is further discussed below.

4.6 The revised payments schedule is not expected to adversely impact the delivery or long terms results of the planned enhancement projects agreed to in the Compensation Deed however the proposed variation itself, is further discussed below.

#### 5.0 Section 4 CMA – Treaty of Waitangi Principles

5.1 Section 4 of the Crown Minerals Act provides that “*all persons exercising functions and powers under this Act shall have regard to the principles of the Treaty of Waitangi (Te Tiriti o Waitangi)*.” The Department consults with iwi if it is determined that an application occurs within their rohe and therefore may impact on their relationship with their lands, resources and taonga.

5.2 The applicant completed a cultural impact assessment for the open cast mine as part of its original application and Ngati Waewae having visited the site did not oppose the granting of the 106ha for the Access Arrangement.

5.3 The Department has undertaken further consultation with iwi regarding this variation application, receiving a response from Ngati Waewae that it is “ok with this application with attention to DOC conditions”.

5.4 Although not specific in comment, the consultation indicates that the variation proposal has not raised concerns with iwi.

5.5 When considered alongside the fact that the proposal would not result in additional effects, and no concerns have been raised with the Department in relation to current effects of the mining, nor the term extension variation, it is considered that the Decision

maker can be satisfied that a decision can be made in accordance with the principles of the Treaty of Waitangi.

#### **6.0 Legal Considerations: Crown Minerals Act 1991**

- 6.1 The purpose of the Crown Minerals Act 1991 is “to promote prospecting for, exploration for, and mining of Crown owned minerals for the benefit of New Zealand.”
- 6.2 Section 61(1A) of the Crown Minerals Act 1991 states that *“the Minister must not accept any application for an Access Arrangement or enter into any Access Arrangement relating to any Crown owned mineral in any Crown owned land or internal waters described in Schedule 4”* of the Act. The land over which the applicant is seeking an AA Variation is not included in Schedule 4, therefore the Minister can accept and consider this application for an AA Variation.
- 6.3 Section 61(2) of the CMA is relevant when considering this AA Variation application and states that):
- “In considering whether to agree to an access arrangement, or variation to an access arrangement, in respect of Crown land, the appropriate Minister (in the case of subsection (1)) or the Minister and the appropriate Minister (in the case of subsection (1AA)) shall have regard to—*
- a) The objectives of any Act under which the land is administered; and*
  - b) Any purpose for which the land is held by the Crown; and*
  - c) Any policy statement or management plan of the Crown in relation to the land; and*
  - d) The safeguards against any potential adverse effects of carrying out the proposed programme if work; and*
  - da) the direct net economic and other benefits of the proposed activity in relation to which the access arrangement is sought; and*
  - db) if section 61C(3) applies, the recommendation of the Director-General of Conservation and summary referred to in that subsection; and*
  - e) Any other matters that the Minister or those Ministers consider relevant.”*
- 6.4 The purpose of the AA Variation application is to extend the term of the existing AA to allow the Applicant to undertake mining activities within MP 51279 and to amend the agreed compensation schedule. In all other aspects, the AA would remain the same. The conclusion in the original decision report was that it was appropriate to approve the Access Arrangement over 106ha of public conservation land subject to the 129 standard and special conditions put in place to safeguard the conservation values and mitigate the potential adverse effects.



**Matters the decision maker shall have regard to:**

**a) The objectives of any Act under which the land is administered**

6.5 The PCL that the applicant has applied in relation to is administered by the Department under the Conservation Act 1987. The long title of the Conservation Act 1987 is "An Act to promote the conservation of New Zealand's natural and historic resources, and for that purpose to establish a Department of Conservation."

6.6 Under the Conservation Act 1987, "conservation" is defined as  
*"...the preservation and protection of natural and historic resources for the purpose of maintaining their intrinsic values, providing for their appreciation and recreational enjoyment by the public, and safeguarding the options of future generations."*

**Comment:**

6.7 The impacts from the proposed AA variation would not materially affect or have additional adverse effects above what was already adequately evaluated in the original AA and subsequent variation assessments nor reduce the benefits of the compensation projects funded via the required compensation payments. The natural and historic resources present will be relatively unaffected subject to compliance with the conditions of the existing Access Arrangement.

**b) Any purpose for which the Land is held by the Crown**

6.8 The land is subject to the MP is contained within the Mount Rochfort Conservation Area and is deemed to be held under the Conservation Act for conservation purposes. It is managed as if it were stewardship area specified under section 25 of the Conservation Act 1987. Section 25 of the Conservation Act states: *"Every stewardship area shall so be managed that its natural and historic resources are protected."*

**Comment:**

6.9 As discussed earlier in this report, the proposed mining operations appeared to be inconsistent with the purposes for which the land is held when assessing the AA and safeguards in the form of conditions were imposed at that time. The proposed variation would not materially affect the potential impacts of the mine on conservation values nor reduce the benefits of the compensation projects funded.

**c) Any policy statement or management plan of the Crown in relation to the land**

- i. **The Conservation General Policy, May 2005 (CGP)**
- ii. **West Coast Conservation Management Strategy (CMS)**

6.10 The West Coast Conservation Management Strategy (CMS) sets out the legal policy, policy and strategic direction for ensuring integrated management, and provides guidance for the Departments work in the form of a vision, objectives and outcomes for places, policies, and milestones.

6.11 The Conservation General Policy (CGP) is the first statement of general policy prepared under section 17C of the Conservation Act 1987. It provides guidance for the implementation of the Conservation Act 1987 and other conservation related legislation. The CGP sets out to achieve integrated conservation management over the wide spectrum of conservation areas administered and tasks performed, while managing a strong statute-based focus on the protection and preservation of natural and historic resources.

**Comment:**

- 6.12 The original permissions report for the AA contains detailed discussion on the relevant policy statements and management plans relating to the Escarpment Mine. Previous analysis has determined that the wider activities occurring on site are generally inconsistent with the Conservation General Policy, and the West Coast Conservation Management Strategy (the CMS). However, the effects leading to these inconsistencies would mostly be minimised through the standard and special conditions proposed in the AA. The further extension of term will not change this assessment nor increase the originally envisaged impact of the mine on conservation values.

**d) The safeguard against any potential adverse effects of carrying out the proposed programme of work**

- 6.13 To safeguard against adverse effects occurring if the AA Variation is granted, the Minister is able to impose any conditions considered necessary as part of an AA Variation that will safeguard any adverse effects that might result from the variation proposal.

- 6.14 Adequate conditions to minimise and mitigate the foreseeable adverse effects are already contained in the AA and no additional conditions, apart from any amendments made in relation to term are required.

- 6.15 During the operation of the mining activity, if the Department became aware that adverse effects were occurring that were not apparent or foreseen during the processing of the AA, then condition 66 of the Access Arrangement could be utilised to review the AA decision and its condition. This ensures that any changing context over the years is able to be taken into account and responded to if necessary.

*If, in the opinion of the Conservator, the mining operations of the Permit holder are having, or may have an adverse effect on the natural, historic or cultural values of the Land, which are not permitted by this Access arrangement the Conservator may either suspend the Access Arrangement until the Permit holder remedies or mitigates such adverse impacts to the extent satisfactory to the Conservator; or review the conditions of this Access arrangement and impose any further conditions necessary to avoid, remedy or mitigate such adverse impacts.*

- 6.16 The permit holder will be required to comply with all other legislation. The associated ability to obtain authorisations for works that form part of an authorised Access Arrangement and work programme or works required to occur as part of compliance with an Access Arrangement, is part of the consideration for safeguards against potential adverse effects. If appropriate resource consents are unable to be obtained or are obtained in a manner that alters the way that the workplan is to be carried out then the Department may wish to reconsider the conditions of the Access Arrangement to ensure that they remain fit for purpose. The RMA process relating to the activities on the land is therefore a consideration under this section.

**da) The direct net economic and other benefits of the proposed activity in relation to which the access arrangement is sought**

- 6.17 The expected direct economic benefits of the proposed variation would not change from those already identified in the original AA reports however BCL have noted that the extension of the life of the Escarpment Mine enhances the value and extends the life of

all of Bathurst's assets in the Buller region, through creating an additional coal blending partner for the Stockton coal resource.

- 6.18 Bathurst also contributes directly and indirectly through sponsorships, grants and providing support for its staff involved in a diverse range of volunteer activities in addition to continuation of employment and expenditure in the Buller district.

**db) If section 61C(3) applies, the recommendations of the Director-General of Conservation and summary referred to on that subsection**

- 6.19 The proposed variation is not considered to be significant from what has been authorised; therefore, Section 61C(3) does not apply.

**e) Such other matters as the appropriate Minister considers relevant**

**Resource Consents**

- 6.20 BCL has the required resource consents in place relating to the Mining activity with the resource consent enabling mining and associated land use disturbance associated with Escarpment due to expire in October 2025.

- 6.21 As you consider the proposal to extend the term you may be mindful of the interaction of any resource consent process that may take place over the proposed term.

- 6.22 The current Access Arrangement granted was based on the information and assessments available, and effects assessment undertaken at the time. If, as a result of the information provided by BCL as part of its resource consent renewal application, the Department changes its assessment of effects considered at the time that the AA was granted, then the AA allows the Department to vary the condition:

*'If any condition attached to any resource consent obtained by the Permit holder are in the opinion of the Minister of Conservation, or the Ministers, as the case may be, inconsistent with this Access arrangement the Minister of Conservation or the Ministers, as the case may be, may review the provisions of the Access arrangement and this Access arrangement may be varied accordingly'.*

- 6.23 This means that any new information that the Department receives during any resource consent process will be able to be considered and the Department is able to commence a review of the AA if considered necessary. Any approved extension of term would not therefore impact on the Department's ability to consider and respond to any new information arising from the resource consent process.

**Bond**

- 6.24 A Cash Bond as required by the AA, is held with the West Coast Regional Council (WCRC) on behalf of the Department, WCRC and Buller District Council for the AA, which will not be affected by this application to vary the AA and more specifically, any term extension.

**Compensation**

- 6.25 The extension of term applied for i.e. 20 years, will have an impact on the currently agreed schedule (timing) of compensation payments, although it is not abundantly clear how much impact, except to acknowledge that compensation payments would be extended beyond what is currently expected. The total amount of compensation to be paid will not change from the amount originally approved in the AA i.e. \$21,964,000 + GST.

- 6.26 District staff have provided comment on the proposed changes to the compensation schedule "estimating that \$1,696,900 is needed annually for the next 10 years to adequately complete the agreed work programme. This amount would allow for the



ability to carry out weed control, monitoring and aerial predator control in both Heaphy and Denniston EMUs in past years as well as the recommended operational timeframe advised by the Tiakina Nga Manu TAG for the protection of our most threatened species. If there are no past years during the next 10 years, there will be approximately \$5.5 million left in treasury for work post 2034-35

- 6.27 It is unclear whether the proposed compensation schedule variation meets the needs of the Districts requirement to have \$1,696,900 annually.

### Term

- 6.28 In determining the length of term, the Department is guided by the appropriate time in which the programme of works set out by the applicant may be completed. The Department's interest is in ensuring that any authorised activities are undertaken in accordance with conditions in a timely manner and the site rehabilitated.

- 6.29 The original AA noted that the applicant proposed to extract up to 1 million run of mine (ROM; pre washed coal) tonnes of coal per year over five years of operation, with access being granted for a 9 year period.

- 6.30 BCL also proposed at that time to progressively rehabilitate disturbed areas and create a final engineered land form (ELF) consisting of raised topography.

- 6.31 The Access Arrangement specifies the extent of activity that can take place within the site and the conditions that must be adhered to. The effects assessment in this report has concluded that there would be no material adverse effects caused by the extension of works for an additional term however District staff have commented that a lesser term than 20 years should be considered in light of nationally significant populations of species continuing to be found, climate change being incorporated into changing legislation, including the WC CMS renewal, stewardship land reclassification and the intention to have a liaison officer more involved in the operations.

- 6.32 It is also worth noting that the Department does not generally align AA's with Minerals Permits –preferring to restrict access arrangements to better reflect the period in which the mining or exploration needs to occur.

- 6.33 In this context, it would appear that a lesser term of ten years may be more appropriate than the 20 years sought via this variation, primarily to allow for mining operations (proper) to get underway, assessing future management of the site and providing some flexibility to consider future management of the wider Buller Plateau. There is nothing to prevent BCL from applying for a further variation to the term, taking into account in three years, planning for the site and the RMA process may have progressed to a point where further discussions can occur between the permit holder and Department about plans for further activities.

- 6.34 Whilst the Department accepts that the permit holder has not been able to complete their proposed mining activities over the previous 9 years, that justifies an extension of term, the appropriate length of term is less clear. The ability to continue to undertake the activities proposed within a work plan will also be affected by obtaining the required authorisations under the Resource Management Act in 3 years time. If those required approvals are not obtained, then this may affect the ability to undertake the work plan and operations onsite. The outcome of any resource consent process for the land is therefore considered to be a relevant matter for consideration under section 61(2)(e) of the Act.

- 6.35 The requirement to rehabilitate the site would not be removed by the expiry of the Access Arrangement.

6.36 A proposed condition wording would be:

*(a) Subject to Conditions 9(c) and (d), the term of the Access Arrangement will be for a period from the date of execution of this Access Arrangement until 23 June 2032 or for the term of Mining Permit 51-279, whichever is the lesser.*

*(b) The parties acknowledge that within the term it is envisaged that the Permit holder will undertake Mining, Mining Operations and progressive rehabilitation.*

## **7.0 Significance assessment**

7.1 MP 51279 is currently classified as a Tier 1 permit. Pursuant to section 61 (1AA)(B), as the variation is to an existing Tier 1 access Arrangement, but does not relate to "significant exploration or mining activities" then the appropriate Minister in this case, the Minister of Conservation or their representative can make the decision. The decision on significance is restricted to the nature of the variation applied for (an extension of term and amendment to the compensation schedule).

### **Relevant matters under section 61(1AAB) of the Act**

7.2 The relevant matters in determining if an application is considered significant for the purposes of joint decision making under section 61(1AAB) of the Act are:

*"(a) the effects the activities are likely to have on conservation values for the land concerned; and*

*(b) the effects the activities are likely to have on other activities on the land; and*

*(c) the activities' net impact on the land, either while the activities are taking place or after their completion; and*

*(d) any other matters that the Minister considers relevant to achieving the purpose of this Act."*

7.3 It is considered that the effects on conservation values, other activities on the land and the activities' net impact on the land will be negligible given the proposal relates to a term extension and administrative amendment to the compensation schedule.

7.4 Previous variations to the compensation schedule have been considered under the same tests and not considered significant.

7.5 On the 8<sup>th</sup> of June the Department was advised of the change of Tier status from 1 to 2 for the Escarpment MP taking effect from the anniversary of the permit issuance i.e. 23 June 2022. Essentially the tier status change further lessens the significance assessment test for this permit.

## **8.0 Conclusion**

8.1 Following consideration of the relevant matters set out above, the following conclusions have been reached:

- The AA variation is for an extension of term of 20 years and for a change to the agreed (and varied) compensation payment schedule.
- It is considered that the effects of the proposed variations are likely to have on the conservation values of the land concerned, other activities on the land, and the activities' net impact on the land are not significant.

- It is considered that a lesser term of 10 years would be more appropriate to allow for mining operations to commence (proper) and to allow for flexibility in considering future mining and management of the site and wider Buller Plateau. ✓
- It is unclear, particularly if a lesser term is granted, whether the compensation schedule as proposed with this variation meets the needs of the district's work programme -future discussions after decisions have been made on the term will need to occur. BCL will be encouraged to discuss with the district and submit a new proposal. ✓
- The existing standard and special conditions would adequately safeguard against adverse effects. ✓
- The requirement to rehabilitate the site would not be removed by the expiry of the AA. ✓
- The iwi feedback received did not raise specific concerns relating to this application. ✓
- When weighted against the matters set out in section 61(2) of the CMA, it is considered that the AA variation application for the term extension should be approved. ✓

**NB** BCL representatives have been advised of the proposed recommendations noted below in this report, having an indication that the department was leaning towards a grant of 10 years being more appropriate. BCL advised that they had no further comment on this recommendation, noting that they are still waiting on a Mining Permit extension of term from NZP & M.

## 9.0 Recommendation

It is recommended that you:

1. **Agree** that the proposed variation application activities are not considered significant activities under the Crown Minerals Act; and ✓
2. ~~Grant/Decline~~ an Access Arrangement Variation (37873-AA-V5) to Buller Coal Limited to extend the term of the AA by 20-years until 23 June 2042;
3. ~~Grant/Decline~~ an Access Arrangement Variation (37873-AA-V5) to Buller Coal Limited to extend the term of the AA by 10-years until 23 June 2032;
4. ~~Decline~~ the proposed variation application relating to changes to the compensation schedule at this time.

Judi Brennan  
Permissions Manager, Hokitika  
Department of Conservation

Date: 20 June 2022

## 10.0 Decision

### Decision:

- 1) Agree / ~~Disagree~~
- 2) ~~Grant~~ / Decline
- 3) Grant / ~~Decline~~
- 4) Grant / Decline



Mark Davies  
Operations Director  
West Coast

Date: June 2022

21 June 2022.

### Comments: