

BEFORE THE HANANUI AQUACULTURE PROJECT EXPERT PANEL

[FTAA-2511-1138]

UNDER THE Fast-track Approvals Act 2024

IN THE MATTER OF an application by Ngāi Tahu Seafoods Limited

**MEMORANDUM OF COUNSEL FOR THE RUAPUKE ISLAND GROUP
WHĀNAU**

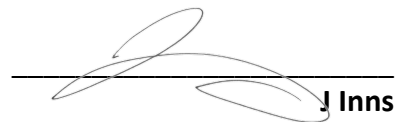
Dated 16 JULY 2026

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Introduction

1. This memorandum is filed in response to the request for information set out at paragraph [22] of the Panel's Minute 7, dated 9 July 2026.
2. Attached to this memorandum are two maps:
 - (a) The first, headed 'Amended Application' was filed in the High Court in April 2025 and shows the area covered by the Ruapuke Island Group application under the Marine and Coastal Area (Takutai Moana) Act 2011 in detail; and
 - (b) The second, helpfully prepared by the Applicant in this matter, shows the location of that application area relative to the Hananui Aquaculture Project site.
3. Counsel can also advise the Panel that the appeal against the decision in *Re Application by Cain (on behalf of Landowners of Ruapuke Island Group)* [2026] NZHC 343, which was pending at the outset of the present process, has been abandoned. The applicants aim to present a draft order for Customary Marine Title to the Court for sealing within the next few months.

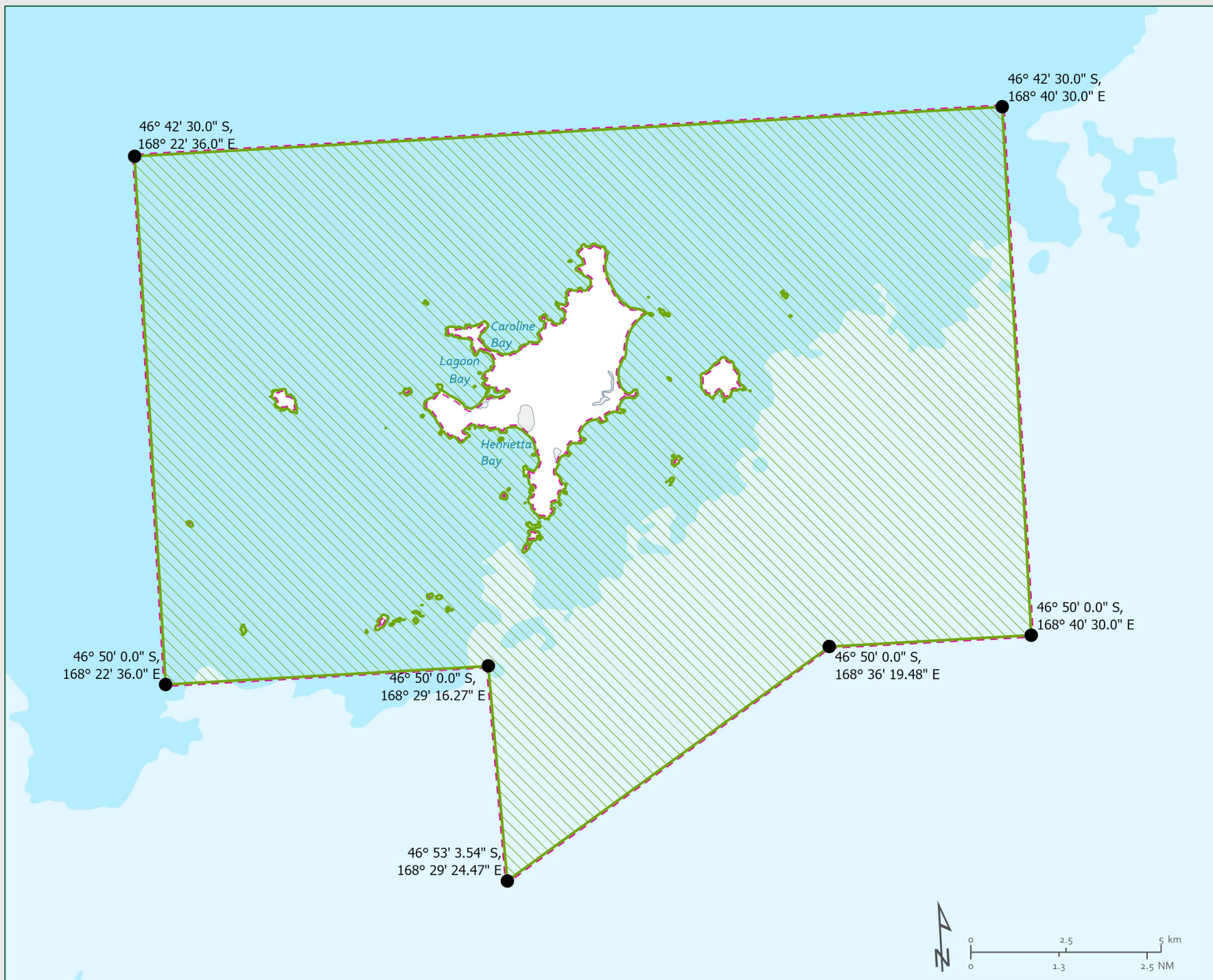
DATED 16 July 2026



**J Inns
Counsel**



- Hearing area
- Combined application area
- Depth is less than 30 metres
- Depth is less than 100 metres

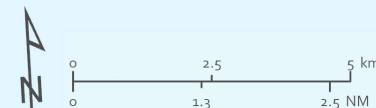


NZGD 2000 New Zealand Transverse Mercator.
Scale: 1:100,000 for an A3 page size.

This map has been produced for the purpose of a High Court application for recognition of Customary Marine Title and/or Protected Customary Rights. Access to material filed in the High Court is governed by the Senior Courts (Access to Court Documents) Rules 2017.

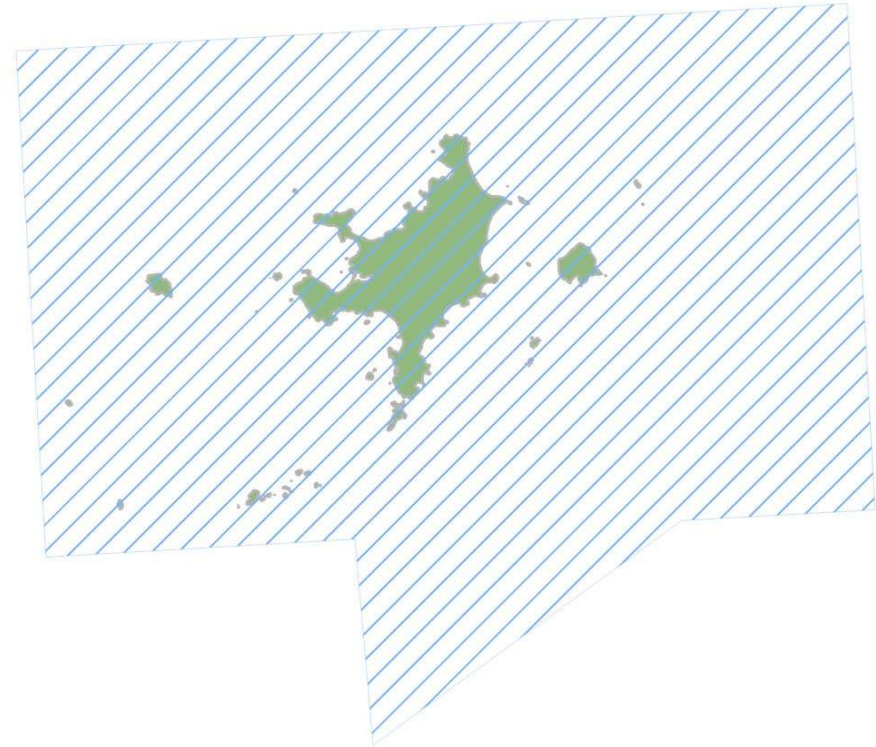
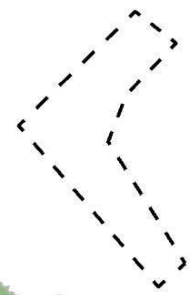
Data source: Stats NZ

Produced by Te Arawhiti on 1/04/2025 9:14 am





0 1 2
Km



[---] HAP area
[hatched] RIG customary marine title