

BEFORE THE PANEL CONVENER

UNDER	The Fast-track Approvals Act 2024, s 42 and in the matter of an application for approvals for the construction and operation of a structural steel manufacturing plant by Green Steel, being a project listed in Sch 2 of the Fast- track Approvals Act 2024
BETWEEN	National Green Steel Limited Applicant
AND	Waikato Regional Council Local authority

MEMORANDUM ON BEHALF OF THE WAIKATO RIVER AUTHORITY

Dated: 30 September 2025

MAY IT PLEASE THE PANEL CONVENOR

1. This memorandum is filed on behalf of Waikato River Authority (**WRA**), in response to the Panel Convenor's Minute 6 of 26 September 2025 inviting parties to respond to the memorandum of Te Whakakitenga o Waikato dated 24 September 2025.
2. WRA attended the convenor conference of 4 September between the Applicant Green Steel Limited (**Green Steel**), the local authorities (Waikato Regional Council (**WRC**) and Waikato District Council (WDC)), the Ministry for the Environment (**MfE**) and Te Whakakitenga o Waikato Inc (**Waikato-Tainui**) and noted the direction taken by the panel convenor that was set out in Minute 4 dated 10 September 2025, to appoint four panel members.
3. On 24 September 2025, counsel for Waikato Tainui filed a memorandum requesting that the Panel Convenor use her discretion under clause 3(7) of Schedule 3 of the Fast Track Amendment Act 2024 (**FTAA**) to enable WRA to appoint an additional panel member to accommodate matters unique to the relevant iwi participation legislation, that being the River Settlement Act.
4. WRA agrees with the rationale for the request by Waikato Tainui in the importance of Green Steel panel selection and process under FTAA so that all parties, including future applicants, clearly understand how panel selection is intended to operate under the River Settlement provisions (in the Green Steel case this is Waikato-Tainui Raupatu River Settlement (Waikato River) Act 2010.
5. WRA believes that Section 28 of River Settlement provisions should set the default position for panel selection. WRA expects that that panels chosen for FTAA will generally be either three or five members.
6. As other parties have noted, the panel convenor has two options available that are to either remove one panel member or appoint an additional member.
7. WRA is neutral on the choice of three or five members for the Green Steel case.
8. If the panel convenor is of a mind to amend the make-up of the panel to three members, then WRA notes the panel can request additional information to assist its consideration of cultural, environmental, technical and strategic matters relevant to the Waikato River and its Te Ture Whaimana o Te Awa o Waikato management framework.

DATED 30 September 2025

A handwritten signature in black ink, appearing to read 'Antoine Coffin'.

Antoine Coffin

Chief Executive for Waikato River Authority