

Teena Koutou, Mr Dave Serjeant (Chair), Mr Martin Williams and Ms Lou Wickham

Re: Central and Southern Block Mining Project [FTAA-2512-1153] - Response to Taharoa Ironsands Limited Memorandum dated 14 August 2026

Maketuu Marae, Te Kooraha Marae and Aaruka Marae appreciate the opportunity to comment on Taharoa Ironsands Limited's (TIL's) memorandum of counsel dated 14 August 2026. We respectfully provide the following submission regarding the Applicant's request to replace aspects of the expert conferencing process directed by the Panel in Minute 22 and the associated request for a further suspension of processing.

We do not oppose the extension of time requested by TIL or the revised timeframes proposed in paragraph 25 of the memorandum.

However, we do not support replacing the expert conferencing process directed by the Panel in Minute 22 with the alternative applicant-led process proposed by TIL. The Panel specifically directed conferencing and collaboration between relevant experts and parties on these matters. We consider that process remains the most appropriate mechanism for testing issues, identifying areas of agreement and disagreement, and assisting the Panel with the development of robust and effective conditions.

While we acknowledge TIL's desire to ensure that operational and practical considerations are taken into account, we do not consider this requires replacement of the conferencing process. TIL and its experts can contribute operational, engineering and technical knowledge as part of the conferencing process in the same way as other participants contribute ecological, hydrological, cultural and environmental expertise.

We are concerned that the alternative process proposed would place TIL in the position of:

- preparing the initial draft responses and condition wording;
- receiving and assessing feedback from other parties;
- determining which amendments, it considers appropriate to adopt; and
- presenting the resulting response to the Panel.

In our view, this is materially different from the conferencing process directed by the Panel and risks reducing opportunities for direct expert engagement and collaborative condition development. It also risks placing TIL in the position of both primary drafter and intermediary through which the views of other parties are presented to the Panel.

Several of the RFIs involve matters extending beyond operational feasibility, including wetland protection, hydrological management, taonga species, maatauranga Maaori and cultural values. We consider it important that these matters are able to be

discussed directly between the relevant experts and parties and presented directly to the Panel. This is particularly important where the Further RFI concerns matters involving maatauranga Maaori, cultural values, taonga species, wetland protection and the lived experiences of our whānau.

If the Panel is nevertheless minded to approve a modified process, we submit that all feedback provided by participating parties and their experts should be lodged directly with the Panel and copied to TIL, with TIL then having the opportunity to respond. This would ensure the Panel receives the views of all parties directly and transparently, rather than through an applicant-managed process. It would also provide a clear record of areas of agreement and disagreement without requiring those views to first be filtered through the Applicant's drafting process.

For these reasons, Maketuu Marae, Te Kooraha Marae and Aaruka Marae respectfully request that the Panel retain the conferencing process directed by Minute 22, while allowing such extensions of time as the Panel considers appropriate.

Ngaa mihi,

John Kanawa

Chair - Maketuu Marae

Taituwaha King

Chair – Te Kooraha Marae

Delwyn Hepi

Chair - Aaruka Marae