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**MINUTE 15 OF THE EXPERT PANEL**

Memorandum on behalf of CIAL and amendment to Minute 14  
Ryans Road Industrial Development [FTAA-2504-1054]  
(17 March 2026)

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[1] On 16 March 2026, a Memorandum of Counsel for Christchurch International Airport Limited (CIAL) was provided to the Ryans Road Industrial Development Expert Panel (the Panel) regarding Expert Panel Minute 14 (Suspension of Application).

[2] Within this Memorandum, CIAL clarifies that it no longer seeks to file additional material at this stage.

[3] CIAL also submits that providing the Applicant with an opportunity to “reply” is unnecessary and was not sought by the Applicant, who instead requested an opportunity to “further refine the proposed conditions.” CIAL further reserves its position in respect of any new material filed by the Applicant (in accordance with fairness and natural justice) and submits that the Panel should ensure no new material is filed.

[4] While the Panel acknowledges that the Applicant sought an opportunity to further refine the proposed conditions, rather than file a reply, the Panel considers that allowing a reply is consistent with fairness and natural justice, particularly in circumstances where CIAL and Airways have filed evidence that challenges the findings of the Applicant’s air safety evidence.

[5] Therefore, notwithstanding that CIAL has reserved its position on the matter, the Panel allows the Applicant to file a reply if it wished to do so, rather than adopt CIAL’s request that the Panel ensure no “new material is filed.”

[6] CIAL further submits that the Applicant should have no more time to submit additional material than CIAL and Airways were given (i.e., four working

days). Accordingly, CIAL submits that the Applicant should be required to file any additional material by the end of Wednesday, 18 March.

[7] Taking into account the matters raised by CIAL, the Panel considers that the following amendments to paragraph [18a] of Minute 14 are appropriate and should apply (new text in bold):

*(a) The Application is suspended until five working days after the Applicant either:*

- i confirms that it does not wish to reply to the statement of evidence and submissions filed by Airways and CIAL on 12 March 2026 **no later than 5 pm Wednesday 18 March 2026**; or*
- ii provides updated conditions and its response strictly in reply to evidence and submissions filed by Airways and CIAL on 12 March 2026 by **no later than 5 pm Friday 20 March 2026**.*



Chris Fowler  
Expert Panel Chair