

INTRODUCTION

1. Te Rūnaka o Ōtākou hold mana whenua status over the site for the proposed Southern Link Inland Port (**Application**). Submissions and involvement are primarily on behalf of Te Rūnaka o Ōtākou. However, as this Project sits within the broad context of Port Otago activities which give rise to wider implications, Kāti Huirapa Rūnaka ki Puketeraki, Te Rūnanga o Moeraki, and Aukaha (1997) Limited are involved in support of the submission made by Te Rūnaka o Ōtākou.
2. This case management memorandum is filed on behalf of Te Rūnaka o Ōtākou, and supported by Kāti Huirapa Rūnaka ki Puketeraki, Te Rūnanga o Moeraki, and Auhaka (1997) Limited, in response to Minute 2 of the Panel Convener (20 May 2026).
3. As set out above, Te Rūnaka o Ōtākou is the relevant iwi authority and relevant Treaty settlement entity in relation to this Application.¹
4. The following will attend the Convener Conference for Te Rūnaka o Ōtākou:
 - (a) Mike Holm and Nicole Buxeda (legal counsel);
 - (b) Brett Ellison (Te Rūnaka o Ōtākou);
 - (c) Shane Ellison (Te Rūnaka o Ōtākou); and
 - (d) Dr Gail Tipa (resource management and cultural matters expert).

¹ See Schedule 3, Minute of the Panel Convener (20 May 2026).

Minute 2

5. The Minute of the Panel Convener dated 20 May 2026 invites all participants to provide the following:²
- (a) comment on the extent of engagement by the applicant both before and following lodgement of the application;
 - (b) the applicant aside, identify in-house experts and external consultants engaged on this project;
 - (c) record processes agreed with the applicant to narrow or reduce any issues relevant to the application and the decision that the panel is required to make;
 - (d) where there is a difference of opinion between the applicant and any other participant, identify the principal environmental effects at issue;
 - (e) describe the complexity of this application;
 - (f) state whether the drafting of proposed consent conditions (including any draft management plan filed) is accepted; and
 - (g) propose efficient processes to enable the panel to understand, resolve or narrow the scope of any likely issues and indicate how these processes may be accounted for under the decision timeframe.
6. At this stage, Te Rūnaka o Ōtākou is unable to provide detailed comments on the legal, evidentiary, and factual complexity of this Application. Accordingly, Te Rūnaka o Ōtākou addresses these matters as far as it is able, however emphasises the need to further develop an informed position

² At [7], [9], [14], and Schedule 2.

and engage with the Application through the ability to provide legal submissions and evidence later in this process.

ENGAGEMENT

7. The Applicant has undertaken engagement with Te Rūnaka o Ōtākou prior to submitting the Application. No issues arise regarding the adequacy of engagement and ongoing consultation.

EXPERTS ENGAGED

8. Kā Rūnaka is in the process of taking advice from Dr Gail Tipa on this matter, however has not yet had the opportunity to brief and engage other experts on this project.

COMPLEXITY

9. While no novel legal issues have been identified at this preliminary stage, the complexity of technical documents submitted, and the decision making required of the Panel, will involve significant breadth and depth of technical matters. We consider that involvement by a range of experts, including water and water management risks, freshwater quality, and ecology, will be required, as will assessment and advice in relation to the adequacy of conditions proposed.
10. Accordingly, Te Rūnaka o Ōtākou suggests that a timeframe of 60 working days would be appropriate.

DRAFT CONSENT CONDITIONS

11. Te Rūnaka o Ōtākou has not had the opportunity to receive fulsome advice on the adequacy of conditions proposed, and as such cannot offer an opinion on the current draft consent conditions at this time.

MĀTAURANGA AND TIKANGA

12. Tikanga is relevant to all applications, and the Panel will need advice on the specific Application. One way to achieve this is to ensure there are multiple persons familiar and competent with local tikanga on the Panel.
13. Any sensitive information provided by Te Rūnaka o Ōtākou in this matter, regardless of the format that it is provided in, will be required to be appropriately protected. As such, Te Rūnaka o Ōtākou will provide notice to the Panel prior to provision of any sensitive information.

CULTURAL VALUES

14. Te Rūnaka o Ōtākou holds concerns regarding effects on cultural values specifically in relation to:
 - (a) the cultural significance of the area;
 - (b) the Ngāi Tahu Claims Settlement Act 1998 and impacts on takoa species as well as constraints on rakatirataka and kaitiakitaka; and
 - (c) the unknown scale of effects on water matters due to design decisions not being available in the Application documentation suite but rather being deferred to the detailed design stages.
15. Te Rūnaka o Ōtākou holds concerns that no further harbour reclamation take place. Commitments are required in this regard.
16. Te Rūnaka o Ōtākou has not yet had the opportunity to form a view in respect of s7 of the Fast-track Approvals Act 2024 in relation to the Application.

PANEL MEMBERSHIP

17. Concerns over cultural effects do not exist in a vacuum, and must be considered as part of the whole consideration. Put simply, te ao Māori must be a lens through which all effects are considered. For the Panel to properly achieve this, multiple Panel members will be required to have competency in cultural matters alongside other specialist knowledge.

PROCEDURAL REQUIREMENTS

18. Te Rūnaka o Ōtākou is willing to engage directly with the Panel as necessary.

COST RECOVERY

19. Te Rūnaka o Ōtākou seeks recovery for preparation and attendance at this conference.

DATE: 2 June 2026

Handwritten signatures of Mike Holm and Nicole Buxeda in blue ink, positioned above a horizontal line.

Mike Holm / Nicole Buxeda

Counsel for Te Rūnaka o Ōtākou, and supported by Kāti Huirapa Rūnaka ki Puketeraki, Te Rūnanga o Moeraki, and Auhaka (1997) Limited,