

Before the Panel Convener

Under the

Fast-track Approvals Act 2024

And

In the Matter of

an application for approvals by NZSki Limited to upgrade existing infrastructure at the Remarkables Ski Area, including a new passenger transport lift, carparking areas, and expanding the ski field into the adjacent Doolans Basin

Memorandum of Counsel on behalf of **NZSki Limited** regarding Convener Conference

Dated: 3 August 2026

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MAY IT PLEASE THE PANEL CONVENER

Introduction

1. This memorandum is filed on behalf of NZSki Limited (**NZSki**) in accordance with Minute 3 of the Panel Convener dated 27 July 2026 in advance of the Convener Conference scheduled for 6 August 2026.
2. This memorandum sets out the matters that NZSki has been invited to address as the applicant for the Remarkables Ski Area Upgrade and Doolans Expansion (**Project**) at the existing Remarkables Ski Field and the adjacent Doolans Basin (**Site**) under the Fast-track Approvals Act 2024 (**FTA**) in preparation for the Convener Conference.

Confirmation of Attendees

3. The following attendees will be present at the Convener Conference on behalf of NZSki:
 - (a) Paul Anderson (NZSki Representative);
 - (b) Ross Lawrence (NZSki Representative);
 - (c) Joshua Leckie (Legal Counsel - Lane Neave);
 - (d) Charlotte Coyle (Legal Counsel - Lane Neave);
 - (e) John Kyle (Planning - Mitchell Daysh); and
 - (f) Kirsty O'Sullivan (Planning - Mitchell Daysh).

Approvals Sought

4. NZSki is seeking the following approvals (together, **Approvals**):
 - (a) resource consents that would otherwise be applied for under the Resource Management Act 1991 (**RMA**);
 - (b) concessions that would otherwise be applied for under the Conservation Act 1987 (**Conservation Act**) and Reserves Act 1977 (**Reserves Act**);
 - (c) wildlife permits that would otherwise be applied for under the Wildlife Act 1953 (**Wildlife Act**); and

- (d) approvals, authorisations and dispensations that would otherwise be applied for under the Freshwater Fisheries Regulations 1983 (**Freshwater Regulations**).

Engagement

Pre-lodgement

5. NZSki has engaged with relevant administering authorities, iwi and key stakeholders prior to lodgement and continues to do so.
6. The approach to and extent of the pre-lodgement engagement undertaken by NZSki is set out in Part E of the Substantive Application. This details consultation, including various workshops and site visits, with:
 - (a) Queenstown Lakes District Council (**QLDC**);
 - (b) Central Otago District Council (**CODC**);
 - (c) Otago Regional Council (**ORC**);
 - (d) Heritage New Zealand Pouhere Taonga (**HNZPT**);
 - (e) New Zealand Transport Agency (**NZTA**);
 - (f) Department of Conservation (**DOC**);
 - (g) Te Rūnanga o Ngāi Tahu (**TRoNT**); and
 - (h) Papatipu Rūnanga of Te Rūnanga o Ngāi Tahu (**Kā Rūnaka**).¹
7. In the paragraphs that follow we summarise both the pre-lodgement and then the post-lodgement engagement to provide an update on both aspects.
8. The *pre-lodgement* engagement undertaken is summarised as follows:
 - (a) High level engagement with CODC began in 2017 to obtain planning guidance on a potential ski area expansion to the Doolans Basin. Consultation with QLDC began in February 2026. Consultation has involved various workshops and site visits and draft reports were provided to QLDC and CODC in relation to heritage, landscape and visual, and recreation

¹ Te Rūnanga o Moeraki, Kāti Huirapa Rūnaka ki Puketeraki, Te Rūnanga o Ōtākou, Hokonui Rūnanga, Waihōpai Rūnaka, Te Rūnaka o Awarua, Te Rūnaka o Ōraka-Aparima.

matters. QLDC and CODC provided comments² and NZSki responded to these matters in the Substantive Application as follows:³

- (i) In relation to recreation, NZSki confirmed it will continue facilitating recreation access to the Remarkables and Hector Mountains, as well as public use of the Rastus Burn and Doolans Valleys.⁴ NZSki will also establish and host a Recreation Users Group (**RUG**) to support public recreation opportunities.⁵
- (ii) In relation to the landscape feedback, NZSki provided higher resolution versions of the Images of Zone Theoretical Visibility maps, outlined proposed conditions to address night time lighting effects and conditions to ensure rehabilitation of earth-worked areas.⁶
- (iii) QLDC did not raise any concerns regarding heritage. CODC feedback on the Heritage Assessment was that there was little for it to be concerned about and that it is unlikely that heritage sites will be present in the areas proposed for development. However, for completeness and best practice, CODC considered that the footprint of the Doolans Water Intake and Access project component should be surveyed in its entirety as well as the accessible parts of the west bank of the Doolans Creek.⁷ In response to this point, NZSki proposes a condition requiring all works to adhere to accidental discovery protocols.⁸ In accordance with HNZPT's recommendation, NZSki will incorporate heritage considerations and the accidental discovery protocols into the site induction process.⁹ This will ensure that protocols are followed including in relation to the proposed water intake and access road.¹⁰

² Substantive Application, A.12 – Section 5 Consultation and Engagement at [5.3.3]-[5.3.4].

³ Substantive Application, E.03 Overview of feedback received from QLDC regarding recreation and landscape considerations, and E.04 Overview of feedback received from CODC regarding recreation, heritage, and landscape considerations.

⁴ Substantive Application, E.03 Overview of feedback received from QLDC regarding recreation and landscape considerations, and E.04 Overview of feedback received from CODC regarding recreation, heritage, and landscape considerations.

⁵ Substantive Application, E.03 Overview of feedback received from QLDC regarding recreation and landscape considerations, and E.04 Overview of feedback received from CODC regarding recreation, heritage, and landscape considerations.

⁶ Substantive Application, E.03 Overview of feedback received from QLDC regarding recreation and landscape considerations, and E.04 Overview of feedback received from CODC regarding recreation, heritage, and landscape considerations.

⁷ Central Otago District Council, Peer Review of Heritage Assessment, 15 April 2026.

⁸ E.04 Overview of feedback received from CODC regarding recreation, heritage, and landscape considerations.

⁹ E.04 Overview of feedback received from CODC regarding recreation, heritage, and landscape considerations.

¹⁰ E.04 Overview of feedback received from CODC regarding recreation, heritage, and landscape considerations.

- (iv) NZSki continues to work with QLDC and CODC as discussed below.
- (b) NZSki has engaged with ORC on the Project since February 2026. This has involved peer reviews of relevant reports, technical workshops and site visits. As a result of discussions with ORC, particularly regarding the potential effects of the water take on the hydrological functioning of downstream wetlands and mean annual low flow calculations, the relevant technical assessments were updated before being provided to ORC in draft form for comment and review.¹¹ Following that, ORC provided feedback on transportation, terrestrial ecology, water take, and freshwater ecology.¹² NZSki's expert consultants are working to respond to this feedback.¹³
- (c) NZSki provided HNZPT with a draft heritage report in February 2026.¹⁴ HNZPT provided no specific comments and agreed that the Project can be undertaken in accordance with an accidental discovery protocol condition which NZSki has incorporated into the proposed conditions.¹⁵
- (d) NZSki began discussions with NZTA as to the long-term future of the State Highway 6 and Remarkables Access Road intersection in February 2026.¹⁶ Following engagement with NZTA, NZSki revisited its transport assessment and considered potential mitigation options to allow flexibility in the final intersection design, while long term network planning and upgrades are undertaken along the state highway network.¹⁷ Discussions with NZTA are discussed further below.
- (e) NZSki has been in discussions with DOC since 2019 in relation to a potential expansion into the Doolans Basin. A project overview workshop with DOC occurred in March 2026 and site visits took place throughout April 2026. DOC has provided feedback on recreation, heritage and landscape matters, which is addressed in the Substantive Application.¹⁸ In response to recreation feedback, the Substantive Application addresses the RUG which will support public recreation opportunities. NZSki already facilitates public access via its private land off State Highway 6 at the bottom of the ski area access road and allows use of its carparks and trails to access the public

¹¹ Substantive Application, A.12 – Section 5 Consultation and Engagement at [5.3.2].

¹² Substantive Application, A.12 – Section 5 Consultation and Engagement at [5.3.2].

¹³ Substantive Application, A.12 – Section 5 Consultation and Engagement at [5.3.2].

¹⁴ Substantive Application, A.12 – Section 5 Consultation and Engagement at [5.3.6].

¹⁵ Substantive Application, E.06 HNZPT Correspondence and H.02A Resource Consent Conditions, Condition GC.19

¹⁶ Substantive Application, A.12 – Section 5 Consultation and Engagement at [5.4.1].

¹⁷ Substantive Application, A.12 – Section 5 Consultation and Engagement at [5.4.1].

¹⁸ Substantive Application, E.05 Overview of feedback received from DOC regarding recreation, heritage, and landscape considerations.

conservation land. NZSki has identified the RUG as the best avenue for developing recreation access as some recreation opportunity settings are beyond the consenting footprint and may require further development within the Remarkables Conservation Area to be fully realised therefore being out of scope of the Project.¹⁹ In relation to heritage, NZSki proposes a condition requiring all works to adhere to accidental discovery protocols. For landscape, NZSki provided higher resolution versions of the Images of Zone Theoretical Visibility maps and the Substantive Application clarifies specific points raised by DOC and addresses proposed conditions to address night time lighting effects. NZSki has received further feedback from DOC, which is discussed further below.

- (f) NZSki began consultation with TRoNT and subsequently Kā Rūnaka²⁰ in 2021.²¹ This has involved a combination of hui with TRoNT and Kā Rūnaka on development of the Project as well as a shared vision for the maunga.²² A process agreement was signed by NZSki in July 2025, however this has since been terminated by Kā Rūnaka following a discussion on costs. Subsequent to that, NZSki has offered to provide the funding to Kā Rūnaka to enable them to prepare a Cultural Impact Assessment which we understand is underway but are yet to receive more details regarding that. NZSki remains open and committed to engagement with Kā Rūnaka and TRoNT for both the Project and the longer term vision for the maunga. NZSki offers to establish a mana whenua working group, enabling mana whenua representatives to provide ongoing advice and input into implementation, management measures, and matters relevant to Kāi Tahu values associated with the Project.²³ NZSki proposes multiple conditions which provide for the working group but also offers to establish this group now in advance of any consent being granted in the interests of the wider maunga.
9. NZSki also undertook consultation with recreational interest groups. Interviews with these groups have formed the basis for the proposed RUG addressed above.²⁴
 10. Engagement with adjacent neighbours was positive.²⁵

¹⁹ Substantive Application, E.05 Overview of feedback received from DOC regarding recreation, heritage, and landscape considerations.

²⁰ Representatives of the seven Papatipu Rūnaka who have shared interests in the Kawarau Remarkables area; Te Rūnaka o Moeraki; Kāti Huirapa ki Puketeraki; Te Rūnaka o Ōtākou; Waihōpai Rūnaka; Te Rūnaka o Awarua; Te Rūnaka o Ōraka-Aparima; Hokonui Rūnaka.

²¹ Substantive Application, E.01 Summary of Mana Whenua Engagement.

²² Substantive Application, A.12 – Section 5 Consultation and Engagement at [5.4.1].

²³ Substantive Application, A.12 – Section 5 Consultation and Engagement at [5.2].

²⁴ Substantive Application, A.12 – Section 5 Consultation and Engagement at [5.4].

²⁵ Substantive Application, A.12 – Section 5 Consultation and Engagement at [5.5].

Post-lodgement

11. NZSki reiterates its commitment to ongoing consultation with the overarching objective to refine outstanding matters prior to Expert Panel commencement. Since submission on 20 May 2026, NZSki has worked to respond to matters raised by other parties.
12. NZSki is working with the administering agencies to respond to the key matters raised during the completeness and scope stage.²⁶ NZSki has provided additional technical reports on the following matters raised by QLDC and DOC as part of the completeness check:
 - (a) climate change and resilience;²⁷
 - (b) ecology;²⁸ and
 - (c) transport.²⁹
13. DOC, QLDC, CODC and NZTA have also provided NZSki with peer reviews of technical assessments included in the Substantive Application since lodgement.
14. NZSki has addressed key matters raised in peer reviews as follows:
 - (a) Water take and aquatic ecology:
 - (i) NZSki has received peer reviews from ORC and DOC in relation to water take and aquatic ecology and has provided the following in response:
 - (A) e3 Scientific, memorandum in response to DOC peer review of *B-08A Doolans Creek Water Take Assessment of Effects*;
 - (B) e3 Scientific, memorandum in response to peer ORC review of *B-08A Doolans Creek Water Take Assessment of Effects*;
 - (C) updated version of *B-08A Doolans Creek Water Take Assessment of Effects* in response to feedback;
 - (D) e3 Scientific, memorandum in response to ORC review of *B-09 Freshwater Ecological Impact Assessment*; and

²⁶ Remarkables Ski Area Upgrades and Doolans Expansion Project, Request for Further Information, 4 June 2026.

²⁷ Climate Change Resilience and the Remarkables Ski Area Upgrades and the Doolans Expansion Project, 1 July 2026.

²⁸ e3s 24043 – Remarkables Upgrade and Doolans Expansion EclA EPA RFI Response, 1 July 2026.

²⁹ Stantec New Zealand, Transport Addendum, Remarkables Expansion Project, 1 July 2026.

- (E) updated version of *B-09 Freshwater Ecological Impact Assessment* in response to feedback.

(b) Wastewater:

- (i) In response to feedback from ORC on wastewater matters, NZSki has provided:

- (A) Mitchell Daysh, memorandum in response to ORC peer reviews of *B-10 Rastus Burn Wastewater Freshwater Ecological Impact Assessment*, *B-11 Wastewater Discharge Impact Assessment*, *B-17A Doolans Creek Right Branch Wastewater Report* and *B-18A Wastewater Treatment and Disposal Feasibility Report*;

- (B) e3 Scientific, memorandum in response to ORC peer review of *B-10 Rastus Burn Wastewater Freshwater Ecological Impact Assessment*; and

- (C) e3 Scientific, memorandum in response to ORC peer review of *B-11 Wastewater Discharge Impact Assessment*.

- (ii) NZSki has also provided updated versions of the following reports in response to feedback:

- (A) *B-10 Rastus Burn Wastewater Freshwater Ecological Impact Assessment*; and

- (B) *B-11 Wastewater Discharge Impact Assessment*.

(c) Terrestrial ecology:

- (i) NZSki has been provided with feedback from ORC, DOC and CODC through peer reviews on ecology matters. NZSki's expert consultants have prepared individual responses to each agency's peer review as follows:

- (A) e3 Scientific, memorandum in response to CODC peer review of *B-12A Terrestrial Ecological Impact Assessment*;

- (B) e3 Scientific, memorandum in response to ORC peer review of *B-12A Terrestrial Ecological Impact Assessment*; and

- (C) e3 Scientific, memorandum in response to DOC peer review of *B-12A Terrestrial Ecological Impact Assessment*.

- (ii) An updated version of *B-12 Terrestrial Ecological Impact Assessment* has also been provided to the agencies which responds to their feedback.
- (d) Expansion tracks, stream crossings and stormwater:
 - (i) NZSki has received feedback in the form of a peer review from ORC on *B-14 Tracks, Stream Crossings and Stormwater Freshwater Ecological and Hydrological Impact Assessment*. NZSki's technical experts have worked through this feedback and have provided the following to ORC:
 - (A) e3 Scientific, memorandum in response to ORC peer review of *B-14 Tracks, Stream Crossings and Stormwater Freshwater Ecological and Hydrological Impact Assessment*; and
 - (B) updated version of *B-14 Tracks, Stream Crossings and Stormwater Freshwater Ecological and Hydrological Impact Assessment* in response to ORC's feedback.
- (e) Transport:
 - (i) NZSki has received feedback from NZTA via email on 23 July 2026 on the Integrated Transport Assessment and Transport Addendum submitted as part of the Substantive Application. NZSki is working through this feedback. To ensure a thorough response, including in relation to any other transport matters raised, NZSki anticipates addressing this feedback in its response to invited comments under Section 53.
- (f) Cultural:
 - (i) As discussed earlier in this memorandum, consultation and engagement has stalled and no conclusion has been reached in relation to the cultural effects of the Project. NZSki has offered to fund a Cultural Impact Assessment from Kā Rūnaka but has not received a formal response to its offer.
- (g) Natural hazards:
 - (i) NZSki has responded to CODC's peer review of the *B-15A Natural Hazards Assessment*. CODC has since provided a review of this response on 8 July 2026 confirming that it satisfies its initial

questions. NZSki has amended proposed conditions of consent in relation to earthworks and rockfall hazard assessment in response to CODC's review.

(h) Economic:

- (i) CODC provided feedback on the Economic Assessment in its completeness memorandum dated 29 May 2026. Mr Patterson, NZSki's economic expert updated the Economic Assessment in response to this feedback on 16 June 2026. CODC's review of the updated Economic Assessment dated 25 June 2026 identifies two additional matters which it stated could be useful for context but were not material to the outcome or findings of the assessment. NZSki will address these matters in its response to comments invited under Section 53.

15. In response to CODC's peer review of *F-01.A Lizard Assessment and Management Plan*, NZSki has engaged e3 Scientific who is currently preparing a response and updated version of this assessment and management plan. NZSki expects that it will be able to provide these to CODC soon.
16. CODC has also provided initial comments in relation to civil infrastructure which NZSki has engaged Stantec to prepare a response to.
17. NZSki will make all documents and updated reports provided in response to peer reviews available to the Expert Panel.
18. A workshop with the local authorities and DOC on wastewater took place on 31 July 2026 and further joint workshops are scheduled as follows:
 - (a) landscape on 3 August 2026;
 - (b) water take, stream crossings and stormwater on 4 August 2026; and
 - (c) ecology on 7 August 2026.
19. The parties have also planned a workshop in relation to lizards and are working to finalise a date for this.

Principal Issues in Contention

20. NZSki anticipates that the following issues are likely to be central to the Expert Panel's consideration of the Project:

- (a) Terrestrial ecology matters relating to expansion of operations into the Doolans Basin:
 - (i) The Site has high or very high terrestrial ecology value although areas already disturbed by existing activity have a lower ecological score.³⁰ NZSki has put forward an effects management package to address effects of the Project on the terrestrial ecology of the Site.³¹
 - (ii) Although direct disturbance of wetlands and streams has been reduced to as low as practicable through Project design, the proposed works, including roading, stream crossings, reservoir inflow diversion, trenching and associated stormwater discharge will result in the direct disturbance of 2000m² of wetlands and 60m² of stream extent.³² Effects will be managed through the implementation of the Construction Environment Management Plan, the Site Specific Sediment and the Erosion Control Plan and Terrestrial Ecology Management Plan.³³ All hydrological function and connectivity of all wetlands and streams will be maintained.³⁴
 - (iii) Lizards present within or adjacent to the vegetation clearance and earthworks footprint may be subject to displacement, social disturbance, and minor or serious injury or mortality as a result of the proposed works.³⁵ The works will also result in the permanent loss or modification of habitat.³⁶ To address these effects a Lizard Management Plan will be implemented and NZSki will provide a fund of \$80,000 for alpine lizard research.³⁷

³⁰ B-12 Remarkables Ski Area Upgrade and Doolans Expansion - Terrestrial Ecological Impact Assessment at [7.1].

³¹ B-12 Remarkables Ski Area Upgrade and Doolans Expansion - Terrestrial Ecological Impact Assessment at [6.5].

³² A-13 Substantive Application Report, Section 6 – Assessment of Environmental Effects at [6.6.12].

³³ A-13 Substantive Application Report, Section 6 – Assessment of Environmental Effects at Table 7-1.

³⁴ B-12 Remarkables Ski Area Upgrade and Doolans Expansion - Terrestrial Ecological Impact Assessment at [8].

³⁵ F-01 Remarkables Ski Area Upgrade and Doolans Expansion - Lizard Assessment & Management Plan at [3].

³⁶ F-01 Remarkables Ski Area Upgrade and Doolans Expansion - Lizard Assessment & Management Plan at [3].

³⁷ F-01 Remarkables Ski Area Upgrade and Doolans Expansion - Lizard Assessment & Management Plan.

- (b) Changes to the recreational values of the Doolans Basin:
 - (i) The Project will meaningfully enhance regional snow sports capacity and increase accessibility to the ski field for a broader demographic however will introduce physical infrastructure and significantly increased users into the Doolans Basin which is currently an isolated backcountry area.³⁸
- (c) Effects of the construction of the reservoir:
 - (i) The Project will result in a high level of effects on Tarn 3 in the Doolans Basin in order to allow for effective water storage.³⁹ This impact will be addressed through compensation measures including the construction of a boardwalk over the wetlands to Lake Alta.⁴⁰ Proposed compensation has been raised by the local authorities and administering agencies. NZSki is in active discussions with DOC regarding its view on compensation measures that may be acceptable to all parties.
- (d) Transport effects:
 - (i) The Project will result in increased traffic in the network surrounding the Site, particularly at the State Highway 6 intersection with the existing Remarkables Ski Field Access Road.⁴¹ The Project includes sufficient transport infrastructure and mitigation measures to accommodate the proposed increase in visitor numbers however a flexible approach to effects management is required due to the Te Tapuae Southern Corridor Structure Plan and changing nature of the receiving environment.

Complexity

- 21. While the reports provided as part of the Substantive Application are extensive and address technical matters, the Substantive Application for the Project does not present any evidential or factual issues that are particularly complex or novel which would significantly extend the decision-making timeframe. All assessments follow well established methodologies for the relevant approvals and statutory frameworks under the FTA. The comprehensive approach to the application ensures the effects

³⁸ B-07 Remarkables Ski Area Upgrade and Doolans Expansion - Recreation Assessment at [1].

³⁹ B-09 Remarkables Ski Area Upgrade and Doolans Expansion - Freshwater Ecological Impact Assessment at [2.2.3].

⁴⁰ A.14 Substantive Application Report Section 7- Management and Monitoring of Actual and Potential Effects at [7.2]

⁴¹ B-24 Remarkables Ski Area Upgrade and Doolans Expansion – Integrated Transport Assessment at page vi.

of the Project are understood and comprehensive measures have been proposed to address these effects.

22. In relation to legal complexity, the legal overview lodged with the Substantive Application addresses the legal assessment criteria for the Approvals.
23. While the FTA approval process remains relatively new, the application for the Project does not introduce any novel or untested legal issues under the relevant Acts.

Proposed Conditions and Management Plans

24. A complete suite of conditions for the Approvals has been provided with the Substantive Application.⁴² Draft management plans have also been provided, in line with the Panel Convener's guidance note.⁴³ This includes:
 - (a) Lizard Management Plan;⁴⁴
 - (b) Construction Environmental Management Plan;⁴⁵ and
 - (c) Terrestrial Ecology Management Plan.⁴⁶
25. The conditions provide for the management plans to be certified by the relevant Consent Authority.
26. NZSki, ORC, QLDC, CODC and DOC have agreed to workshop proposed conditions of consent once substantive effects matters have been resolved or progressed.

Expert Panel Composition

27. NZSki respectfully submits that the Panel Convener appoints an Expert Panel with the following expertise and experience:
 - (a) an experienced lawyer and/or planner;
 - (b) terrestrial ecology (flora and fauna); and
 - (c) water management.

⁴² Substantive Application, Part F and Part H.

⁴³ Panel Convener Practice and Procedure Guidance at [21.1].

⁴⁴ Substantive Application, F.01 Remarkables Ski Area Upgrade and Doolans Expansion - Lizard Assessment & Management Plan.

⁴⁵ Substantive Application, F.02 Remarkables Ski Area Upgrades and Doolans Expansion - Construction Environmental Management Plan.

⁴⁶ Substantive Application, F.03 Remarkables Ski Area Upgrade and Doolans Expansion – Terrestrial Ecology Management Plan.

28. NZSki does not consider that there are circumstances which justify the appointment of more than four panel members.⁴⁷

Timeframes and Expert Panel Process

29. NZSki is available to engage directly with the Expert Panel to advance progress of the application efficiently.
30. NZSki suggests that the Expert Panel undertake a site visit for context and will work with the Expert Panel to facilitate this.
31. NZSki is committed to working constructively with the Expert Panel and the Environmental Protection Authority (**EPA**) throughout the FTA process and is available to assist the Expert Panel as necessary.
32. NZSki's estimated timeframe is set out in **Appendix A** to this memorandum.
33. NZSki respectfully requests a decision timeframe of 110 working days from the date for receiving comments under Section 53.
34. Counsel considers this reasonable considering the scale, nature, and complexity of the approvals sought and ongoing engagement underway (and anticipated to continue). While the Project is the first to seek approvals for large-scale recreational activity authorised by concessions under the FTA, the issues expected to be raised are not novel.
35. NZSki considers this would allow the Expert Panel sufficient time to:
- (a) read and evaluate an application of this scale, nature and complexity and any comments received;
 - (b) direct and hold expert conferencing and workshopping within a generous time period (if required);
 - (c) draft a decision and conditions; and
 - (d) finalise the decision having considered responses filed pursuant to Sections 70 and 72.
36. NZSki does not consider that the issues in contention will require a hearing to resolve, but the proposed timeframe should allow for this if the Expert Panel deems necessary.

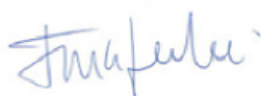
⁴⁷ Fast-track Approvals Act 2024, Schedule 3, Clause 3(7).

37. NZSki is committed to ongoing engagement with stakeholders and looks to refine outstanding issues through that engagement and the responses to further information. A generous decision timeframe has been recommended to enable those discussions to continue and ideally conclude with further refinement.
38. Engagement already underway, and planned, between the parties on the key remaining issues outlined above, in particular ecology matters, is ongoing. This includes the scheduled workshopping sessions outlined above. This engagement continues to be constructive, and the parties are making good progress on narrowing and progressing the issues in contention. Counsel respectfully suggests it would be efficient and productive to allow for a further 3-4 weeks following the Convener Conference to continue these discussions before the Expert Panel formally commences their appointment.
39. The parties could provide an update to the Expert Panel upon commencement on the outcome of the discussions and which matters remain outstanding, alongside any documentation updated as a result of these discussions.

Conclusion

40. NZSki respectfully requests referral of the Project to an Expert Panel in accordance with the matters set out above.
41. NZSki is committed to ensuring an effective conference by providing any necessary information and expert input to ensure a constructive process.

Dated 3 August 2026



Joshua Leckie and Charlotte Coyle
Counsel for NZSki Limited

APPENDIX A

Estimated Timeframe

This timeframe is indicative and may need adjustment pending the commencement date of the Expert Panel.

Step	Working Days	Date (Indicative)
Post Expert Panel Appointment		
1. Expert Panel Commencement	Occurs 5 working days after Expert Panel appointment (Set timeframe).	27 August 2026 (<i>three weeks following the date of the Convener Conference</i>).
2. Expert Panel Invites Comments	10 working days after Step 1 (Set timeframe).	10 September 2026
3. Invited Parties Provide Comments	20 working days after Step 2 (Set timeframe).	8 October 2026
4. Applicant Response to Comments	5 working days after Step 3 (Set timeframe).	15 October 2026
5A. Expert Conferencing / Mediation / Other Processes	57 working days after Step 4 for 110 working days timeframe. (This is an assumption and is not a set timeframe).	26 January 2027
5B. Other Procedural Steps, Evaluation and Decision	10 working days after Step 5A (Not a set timeframe).	10 February 2027
Draft Decision is to Approve		
6. Draft Decision and Conditions to Ministers	5 working days after Step 5B (Not a set timeframe).	17 February 2027
7. Response from Ministers	10 working days after Step 6 (Set timeframe).	3 March 2027
8. Applicant Response to Ministers' Comments	10 working days after Step 7 (Not a set timeframe).	17 March 2027
9. Draft Conditions and Decision to Participants	3 working days after Step 6 (Not a set timeframe).	22 February 2027
10. Participant Comments on Draft Conditions	10 working days after Step 9 (Not a set timeframe).	8 March 2027
11. Applicant Response to Participants on Conditions	5 working days after Step 10 (Set timeframe).	15 March 2027
12. Further Procedural Step if Conditions not Agreed	10 working days after Step 11 (not a set timeframe).	31 March 2027
13. Evaluate and Finalise Decision	5 working days after Step 12 (Not a set timeframe).	7 April 2027
14. Decision Release	110 working days after the date for receiving comments under Section 53.	7 April 2027