

Before the Expert Panel

Under the Fast-track Approvals Act 2024 (**FTAA**)

And

In the matter of an application for approvals by Taharoa Ironsands Limited to continue existing mineral sand extraction, including land preparation works, constructing a water supply reservoir, extracting ironsand material, processing extracted material, and transporting raw and processed material on 911 hectares at Taharoa Road, Taharoa, approximately 8 kilometres south of Kawhia and 45 kilometres northwest of Te Kūiti (**Central and Southern Block Mining Project**)

Memorandum of counsel on behalf of Taharoa Ironsands Limited
to the Expert Panel

Dated 3 July 2026

MinterEllisonRuddWatts.

PO Box 105 249 Auckland City 1143

T +64 9 353 9700

Solicitor acting: Tom Atkins | [REDACTED]

Partner responsible: Stephanie de Groot [REDACTED]

MAY IT PLEASE THE PANEL

1. The purpose of this memorandum is to respond to Minute 16 and Minute 17 of the Expert Panel (issued on 17 June 2026 and 29 June 2026 respectively) regarding:
 - (a) Minute 17: the timeframe for Taharoa Ironsands Limited (**TIL**) to respond to the Panel's request for further information (**RFI**); and
 - (b) Minute 16: TIL's proposed approach to responding to the hui at Aaruka Marae, including dates.

TIMEFRAME FOR RESPONSE TO THE PANEL'S RFI

2. In Minute 17 the Expert Panel requested that TIL provide the information outlined in its RFI by Tuesday 14 July 2026 (in line with section 67(3) of the Fast-track Approvals Act 2024).
3. TIL has considered the breadth of the information requested in the RFI and consulted with its expert team regarding the timeframe required to provide a robust response, and requests that a small amount of additional time is provided for its response.
4. Rather than formally suspended processing of the application, TIL requests that the timeframe for its RFI response is extended by three working days at the Expert Panel's discretion from Tuesday 14 July to Friday 17 July 2026.
5. TIL understands that the Expert Panel wishes to receive TIL's response to the RFI before undertaking a second site visit (on Tuesday 21 July 2026), and the Panel Facilitated Conference (on Wednesday 22 July and Thursday 23 July 2026). TIL's proposed extension would mean that no changes are required to these process steps to ensure that TIL's RFI is provided in advance.

DATES FOR TIL'S RESPONSE TO THE HUI

6. In Minute 16 of the Expert Panel (issued on 17 June 2026), the Panel invited TIL to respond to presentations made by the parties at the hui held at Aaruka Marae on 8 June 2026.

7. The Panel has offered TIL the opportunity to present its response by way of a Teams presentation, as well as, or instead of, a written response.
8. TIL thanks the Panel for this opportunity and confirms that it will deliver a presentation and file a written response to the Panel to supplement the presentation. Accordingly, TIL proposes the following:
 - (a) TIL is available to give the presentation at a time convenient for the Panel on Thursday 30 July 2026, via Teams (as proposed by the Panel);
 - (b) At this stage Stephanie de Groot (legal counsel), Mr Wayne Coffey (Director and CEO, TIL) and potentially Grant Eccles (planner) will appear together to present on behalf of TIL. TIL proposes to update the Panel closer to the time to confirm who from TIL's team will attend; and
 - (c) TIL will file a written response with the Panel before close of business on Wednesday 29 July 2026 to supplement its presentation.
9. TIL has proposed the 30 July deliberately as it is after TIL's RFI response, the second site visit, expert conferencing, and the Panel Facilitated Conference. This timing will enable the Panel to ask TIL any residual questions arising from those processes if need be.

DIRECTIONS SOUGHT

10. We respectfully request that the Panel directs/confirms the following:
 - (a) The timeframe for TIL's response to the Panel's RFI is extended from Tuesday 14 July 2026 to Friday 17 July 2026;
 - (b) TIL file its written response to the hui at Aaruka Marae on Wednesday 29 July 2026; and

- (c) TIL will give its presentation in response to the hui at Aaruka Marae at a time convenient for the Panel on Thursday 30 July 2026, via Teams.

DATED this 3rd day of July 2026



Stephanie de Groot / Tom Atkins
Counsel for Taharoa Ironsands Limited