

IN THE MATTER OF an application by Trans-Tasman Resources for
the Taranaki VTM Project [FTAA-2505-1048]
under the Fast-track Approvals Act 2024

**MEMORANDUM OF COUNSEL FOR
ARAUKUUKU HAPŪ
NGĀTI TŪ HAPŪ
TE PATUTOKOTOKO
IN RESPONSE TO PANEL CONVENOR'S MINUTE OF 26 JULY 2025**

Dated: 2 July 2025

BLACK LAW

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Counsel: Lisa Black

1. We have very recently been instructed to act for the Araukuuku and Ngāti Tū hapū of Ngāruahine, and for Te Patutokotoko in this matter.
2. We refer to the Panel Convener's minute of 26 June 2025 ahead of the conference to be held on Monday 7 July 2025 at 10am.
3. This memorandum addresses the views of our clients on the matters raised in that Minute.
4. Our clients support the memorandum filed by Ngāti Hāua, and anticipate they will support memoranda filed by their other whanaunga groups.

COMPLEXITY

5. This case is expected to be legally, factually, and technically complex, with large volumes of evidence. It is anticipated that these matters will be highly contested.

ISSUES

6. Our clients anticipate that there will be significant dispute as to the nature and location of environmental, cultural, and economic effects, and the evidence on those matters. They also anticipate that any asserted economic benefits, and negative effects of those asserted benefits on the interests of mana whenua mana moana, will be the subject of dispute.

TIKANGA

7. Tikanga evidence is expected to be central to this application, as it was to consideration of the previous applications.
8. Tikanga evidence requires a kanohi ki te kanohi hearing.
9. Tikanga evidence takes time to prepare, as it must be developed through wānanga, consultation, and discussion. This process takes time and cannot be truncated.

PANEL

10. Given the anticipated effects of the application on mana whenua mana moana, our clients consider it would be appropriate for all panel members

to be Māori who connect to their Māoritanga, and for a majority to affiliate to Aotea waka.

11. Our clients support the expertise requirements set out in the Ngāti Hāua application at 15(a)-(f). They further consider a majority of members should have expertise in the tikanga of the iwi and hapū of Aotea waka.
12. The nominations of Loretta Lovell and Miria Pomare are supported.

PROCEDURAL REQUIREMENTS

13. Notwithstanding the very real limitation of their available resources, our clients consider that a full hearing process is required so that the evidence as it relates to them may be rigorously tested.

COST RECOVERY

14. Our clients seek recovery of their legal fees for preparation for, and attendance at, this conference.

Dated at Nelson this 2nd day of July 2025



Lisa Black
Counsel for the parties