

Before the Panel Convenor

Under the Fast-track Approvals Act 2024, s 42 and in the matter of an application for approvals for the construction and operation of a structural steel manufacturing plant by Green Steel, being a project listed in Sch 2 of the Fast-track Approvals Act 2024

Between **National Green Steel Limited**
Applicant

And **Te Whakakitenga o Waikato**
Interested Party

Memorandum of Counsel for Te Whakakitenga o Waikato

30 September 2025

Bell Gully

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May it please the Panel Convenor

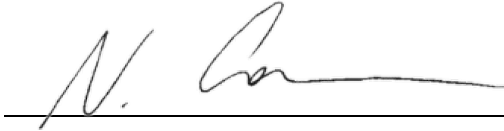
1. This memorandum is filed on behalf of Te Whakakitenga o Waikato in response to Minute 6 of the Panel Convenor dated 26 September 2025, inviting comment on the issues raised by our memorandum dated 24 September 2025.
2. Te Whakakitenga o Waikato acknowledges the memoranda filed on behalf of National Green Steel Limited (the **Applicant**), Waikato Regional Council (**WRC**), and the Waikato River Authority which support the appointment of either a three- or five-member panel.¹
3. The purpose of this memorandum is to confirm Te Whakakitenga o Waikato is comfortable with the appointment of a three-member panel for the determination of the Applicant's substantive application if the Panel Convenor considers her role is to support the process that would usually occur under the Waikato-Tainui Raupatu Claims (Waikato River) Settlement Act 2010 (**River Settlement Act**) with the local authority panel member nomination satisfying both the Fast-track Approvals Act 2024² and the River Settlement Act³ requirements.
4. Alternatively, if the Panel Convenor wishes to proceed with her initial decision of stepping into the role of WRC under the River Settlement Act and appointing a fourth panel member as outlined in Minute 5 dated 22 September 2025, Te Whakakitenga o Waikato submits that the panel membership should be increased to five members to be consistent with the

¹ Memorandum on behalf of the National Green Steel Limited dated 29 September 2025 at [8] and [10]; Memorandum on behalf of the Waikato Regional Council dated 29 September 2025 at [7]–[8]; and Memorandum on behalf of the Waikato River Authority dated 30 September 2025 at [7].

² Schedule 3, clause 3(3), Fast-track Approvals Act 2024.

³ Section 28(2)(a), Waikato-Tainui Raupatu Claims (Waikato River) Settlement Act 2010.

co-management arrangements under the River Settlement Act for the reasons outlined in our memorandum dated 24 September 2025.



Natasha Garvan / Rebekah Te Rito / Anna Coomber

Counsel for Te Whakakitenga o Waikato

30 September 2025