

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 19 May 2026

MinterEllisonRuddWatts.

PO Box 105 249 Auckland City 1143

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Solicitor acting: Tom Atkins |

Partner responsible: Stephanie de Groot

MAY IT PLEASE THE PANEL

1. We refer to Minute 10 of the Expert Panel dated 16 May 2026.
2. Minute 10 addresses the scope of works for Mr Philip Kelsey who has been appointed as an advisor to the Expert Panel on matters relating to hydrology and hydrogeology. The Panel has invited comments from the parties on the proposed scope of Mr Kelsey's work by Tuesday 19 May 2026.
3. In response, TIL advises that it generally supports the proposed scope of Mr Kelsey's work. However, TIL suggests that the Panel consider expanding the scope to include reviewing any other expert hydrology and hydrogeological assessments that may be provided by other parties in response to the Panel's invitation to comment on the application under section 53 of the FTAA (in addition to the assessments provided on behalf of TIL).
4. TIL also supports the Panel's advice that parties will have the opportunity to respond to advice provided to the Panel by Mr Kelsey. TIL will take this approach.
5. In Minute 10 the Panel also advised that it has identified some discrepancies between the number of identified wetlands contained in maps in the Terrestrial Ecology and Hydrology Assessment reports (Appendices K and N, respectively) provided with TIL's substantive application. The Panel advised it will issue an RFI requesting that TIL amends these documents to adopt a consistent numbering system or allow a comparison between the two numbering systems. The Panel requested that TIL begin working on this request. TIL confirms that it is working on this request and will provide a response as soon as possible.

DATED this 19th day of May 2026



Stephanie de Groot / Tom Atkins
Counsel for Taharoa Ironsands Limited