

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 13 July 2026

MinterEllisonRuddWatts.

PO Box 105 249 Auckland City 1143

Solicitor acting: Tom Atkins

Partner responsible: Stephanie de Groot

MAY IT PLEASE THE PANEL

1. The purpose of this memorandum is to respond to Minute 18 regarding the Panel Facilitated Conference (**Conference**) scheduled for Wednesday 22 July 2026 and Thursday 23 July 2026 in Hamilton.
2. Below TIL sets out some availability constraints concerning three of its expert witnesses and an update on the timing of questions that TIL intends to suggest to the Panel to put to experts.

EXPERT AVAILABILITY

3. TIL advises that the following expert witnesses have availability constraints:
 - (a) Mr Andrew Curtis (TIL's air quality expert) is unavailable on Wednesday 22 July 2026 as he is appearing as an expert witness in a hearing in Christchurch. Mr Curtis advises that he can participate in the Conference on Thursday 23 July 2026, but requests the flexibility of attending the Conference remotely, as he may have difficulty travelling to Hamilton in time for the Conference. In the interim, Mr Curtis will attempt to make the necessary arrangements to attend in person.
 - (b) Mr Brett Beamsley (General Manager for Research and Innovation at MetOcean Solutions) is unavailable to attend the Conference on Wednesday 22 July 2026. Mr Beamsley oversaw the discharge dispersion modelling undertaken by MetOcean Solutions to model the discharge to the coastal marine area related to the proposed activities.¹ Should Mr Beamsley's attendance be required, Mr Beamsley advises that he can participate in the Conference on Thursday 23 July 2026.
 - (c) Ms Deanna Clement (TIL's marine mammals' expert) is unavailable to attend the Conference in its entirety because she will be completing survey work in the field. However, TIL does not anticipate that this will be an issue, as no other parties have provided expert evidence and recommendations relating to marine mammals. In the event that the Panel wishes to ask Ms Clement

¹ Appendix FF – Discharge Dispersion Modelling Assessment of the Substantive Application Report.

any questions related to marine mammal conditions at the Conference, TIL suggests that these are put to Mr Grant Eccles (TIL's planner) in the first instance – and he can respond to the extent that he is able to from a planning perspective, or otherwise, that Ms Clement is provided an opportunity to respond to any questions in writing.

PRE-CONFERENCE QUESTIONS

4. In Minute 18, the Panel noted that it may allow parties to suggest questions to be put to the experts during the Conference. At the pre-Conference meeting on Thursday 9 July 2026, the Panel indicated that questions to be put to the experts could also be suggested to the Panel in advance of the Conference.
5. TIL intends to submit some suggested questions to the Panel via a memorandum once the Conference agenda has been circulated.
6. TIL's counsel will (and other TIL representatives may) attend the Conference in person. TIL's counsel may also suggest some additional questions to the Panel to put to the experts at the Conference.

DIRECTIONS SOUGHT

7. We respectfully request that the Panel directs/confirms the following:
 - (a) Mr Curtis may attend the Conference remotely on Thursday 23 July 2026 if he cannot attend in person, and will be provided a Teams or other video conference link to do so;
 - (b) Mr Beamsley is excused from attending the Conference on at least Wednesday 22 July 2026; and
 - (c) Ms Clement is excused from attending the Conference, and that any questions that the Panel was intending to put to Ms Clement at the Conference are put to Mr Grant Eccles (TIL's planner) in the first instance – and he can respond to the extent that he is able to from a planning perspective, or otherwise, that Ms Clement is provided an

opportunity to respond to any questions in writing.

DATED this 13th day of July 2026

A handwritten signature in blue ink, appearing to read 'Stephanie de Groot' or 'Tom Atkins', written in a cursive style.

Stephanie de Groot / Tom Atkins
Counsel for Taharoa Ironsands Limited