

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 17 July 2026

MinterEllisonRuddWatts.

PO Box 105 249 Auckland City 1143

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Solicitor acting: Tom Atkins [REDACTED]

Partner responsible: Stephanie de Groot [REDACTED]

MAY IT PLEASE THE PANEL

1. In Minute 17 dated 29 June 2026 the Panel issued a series of requests for further information to Taharoa Ironsands Limited (**Panel's RFI**), due on Tuesday 14 July 2026.
2. In Minute 19 of dated 7 July 2026 the Panel noted that it would consider the RFIs if they were received on Friday 17 July 2026.
3. The Applicant's responses to the Panel's RFI are set out in **Attachment 1** to this memorandum.
4. Responses to each of the Panel's RFI have been provided in a textbox underneath the relevant question. Where a response has been prepared by a member of TIL's expert team on behalf of TIL, the relevant author(s) has been identified. TIL's responses have been authored by:
 - (a) Grant Eccles, Lead Planner, Tonkin + Taylor;
 - (b) Jared Petterson, Director, Enviser;
 - (c) Hamish Dean, Principal Ecologist, SLR;
 - (d) Hannah Mueller, Principal Ecologist, Phoenix Ecology;
 - (e) Keren Bennett, Technical Director, Ecology, SLR;
 - (f) Eddie Beetham, Senior Coastal Scientist, Tonkin + Taylor;
 - (g) Jon Williamson, Managing Director, Principal Hydrologist, WWLA;
 - (h) Josh Mawer, Senior Hydrologist, WWLA;
 - (i) Jake Scherberg, Senior Hydrogeologist, WWLA;
 - (j) Andrew Curtis, Air Quality Consultant, Pattle Delamore Partners;
 - (k) Deanna Clement, Team Leader, Marine Mammal Ecology, Cawthron Institute;
 - (l) Glen Farley, Director, Clough Associates;
 - (m) Pete Wilson, Principal Consultant, SLR;

- (n) Darran Humpheson, Technical Director, Acoustics, Tonkin + Taylor;
- (o) Brett Beamsley, General Manager Research and Innovation, MetOcean Solutions;
- (p) Kirdan Lees, Economist, Sense Partners;
- (q) Wayne Coffey (Director and CEO), Stevo Jokanovic (Senior Mining Engineer) and Modher Barakat (Technical Services Mining Consultant), Taharoa Ironsands Limited; and
- (r) Counsel for TIL, MinterEllisonRuddWatts.

5. The responses in Attachment 1 are supplemented by **Appendices A – K**.

DATED this 17th day of July 2026



Stephanie de Groot / Tom Atkins
Counsel for Taharoa Ironsands Limited