

## FAST-TRACK APPROVALS ACT 2024 – Substantive Application for Taharoa Ironsands Limited (TIL)

**To:** Ms Jennifer Caldwell, Associate Panel Convener for the purpose of the Fast-track Approvals Act 2024  
**From:** Sam Mikaere, Group CEO, Te Nehenehenui  
**Date:** 18 March 2026  
**Matter:** Fast Track Application Central and Southern Mining Block [FTAA-2512-1153]

### 1. Introduction

This Memorandum responds to Minute 1 of the Panel Convener dated 13 March 2026. Thank you for the opportunity to participate in the panel convener’s conference. Te Nehenehenui participates as a relevant Treaty settlement entity under the Fast-track Approvals Act 2024 and represents the interests of Ngāti Maniapoto within the project area.

The purpose of this memorandum is to assist the Associate Panel Convener in determining:

- the appropriate composition of the expert panel; and
- the timeframe required for the panel to determine the application.

### 2. Approvals

The application seeks approvals across a wide range of activities and environmental domains, including:

- land use activities associated with mining operations
- discharges to land, air, freshwater and the coastal marine area
- damming, diversion and taking of water
- occupation of space in the coastal marine area
- disturbance of land and vegetation including natural inland wetlands.

The application affects multiple environmental systems simultaneously, including coastal processes, freshwater environments and groundwater systems.

### 3. Complexity

- a) The application seeks a range of approvals, being:
- a wildlife approval
  - an archaeological authority
  - resource consents under Resource Management Act 1991 through the National Environmental Standard for Freshwater 2020, National Environmental Standard for Commercial Forestry 2017, Waikato Regional Plan and Waikato Regional Coastal Plan (operative and proposed).

- b) There are considerable complexities in respect of Te Nehenehenui's role, noting that:
- Te Nehenehenui is a relevant iwi authority for the purposes of section 53(2)(a).
  - under section 53(2)(c)(i), Te Nehenehenui is a relevant Treaty settlement entity, including being an entity that has an interest under a Treaty settlement within the area to which the substantive application relates.
  - the Maniapoto Claims Settlement Act 2022 defines a statutory acknowledgement area which includes the coastal area adjacent to Taharoa C Block and the Mitiwai and Wainui Streams.
  - a significant consideration will be section 134 of the Maniapoto Claims Settlement Act 2022 which articulates Te Nehenehenui's vision, principles and aspirations, and guides the interpretation and implementation of statutory redress relating to resource management, particularly in relation to Ngā Wai o Maniapoto.
- c) The evidentiary material supporting the application is extensive, highly technical and a number of matters are disputed.

#### 4. Mātauranga and Tikanga

Tikanga Māori and mātauranga Māori are directly relevant to the assessment of this application. It is our view that relevant considerations include:

- Te Mana o te Wai – prioritising the quality and integrity of water for present and future generations.
- Ngā Wai o Maniapoto – the duty to restore, protect and enhance Maniapoto waters through active participation in decision-making.
- Te mana tuku iho o Waiwaiā – recognition of Waiwaiā as spiritual kaitiaki, requiring consultation on matters affecting Maniapoto.
- Kaitiakitanga – restoring relationships with water, enabling manaakitanga, respecting Maniapoto tikanga and empowering Maniapoto involvement.
- Recognition of Maniapoto mana – acknowledging the significance of Ngā Wai o Maniapoto and the environment to Maniapoto identity.
- Recognition of Maniapoto as rangatira and kaitiaki in resource management and decision-making.
- Te Tiriti o Waitangi / Treaty of Waitangi – recognition of Maniapoto and the Crown as Treaty partners and the obligations of local authorities to give effect to Treaty principles.

#### 5. Panel Membership

Te Nehenehenui considers that the panel should collectively include expertise in the following areas:

- environmental and technical expertise relevant to mining and extractive industry operations
- technical expertise in hydrology and groundwater systems
- tikanga Māori and Treaty settlement frameworks.

We note in respect of panel member selection, relevant iwi participation legislation may be applicable to Te Whakakitenga o Waikato Incorporated. Please be advised that Te Nehenehenui will support the appointment of a panel member nominated by Te Whakakitenga o Waikato Incorporated.

## 6. Procedural Matters

Te Nehenehenui is willing to engage directly with the panel to assist efficient consideration of the application. However, we are not well resourced and do not have access to technical experts other than in planning (and, of course, Tikanga Māori and mātauranga Māori). We will need to rely heavily on the views of the independent technical experts the panel consults as part of this process.

## 7. Decision Timeframe

Given the nature and scale of the proposal, volume of technical material, cultural and Treaty settlement considerations, Te Nehenehenui considers that a decision timeframe of 60-65 working days following receipt of comments is appropriate.

## 8. Other Issues

In respect of other information needed to decide time frames, it is not clear to us whether district plan land use consents need to be sought or whether the applicant needs a resource consent under NOISE-R4 - Underwater noise generation (Proposed Waikato Regional Coastal Plan). If these are required, it may delay the proposal.

Thank you for the opportunity to comment on these matters.

Nāku noa, nā



Sam Mikaere  
**Group CEO**  
**Te Nehenehenui**

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