

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 5 June 2026

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Partner responsible: Stephanie de Groot | [REDACTED]

MAY IT PLEASE THE PANEL

1. We refer to Minute 14 of the Expert Panel dated 3 June 2026.
2. Minute 14 responds to the Memorandum of Counsel on behalf of Taharoa Ironsands Limited (TIL) dated 28 May 2026 regarding the proposed hui.
3. Below we respond to two specific matters arising out of Minute 14 on behalf of TIL – the Panel’s advice that it will arrange a recording but not a transcript of the hui, [REDACTED]
4. For completeness we note that TIL does not agree with other points made by the Panel in Minute 14 but it does not wish to take those points any further at this stage.

TRANSCRIPT OF THE HUI

5. As already advised, TIL will not attend the hui; it will make any response in writing after completion of the hui.
6. In Minute 14, the Panel confirmed that a full recording (but not a transcript) will be made available should the Applicant prefer to make any response in writing after completion of the hui.¹
7. TIL reiterates its request for a transcript along with a recording of the hui and respectfully requests the Panel reconsiders this matter. A transcript will ensure that TIL is able to provide an accurate and informed written response to any comments made at the hui and it would be procedurally fair in the circumstances.
8. We note that a recording and a transcript of the Panel Convenor Conference and Project Overview Conference were made publicly available after the conferences. TIL considers that the same approach should be taken in respect of the hui – this would be consistent with the Panel’s previous approach and fair to parties who will not attend (such as TIL) or were not invited to attend the hui.
9. We understand that a recording and full transcript was also prepared and publicly available in respect of the Taranaki VTM Project in relation to a hui

¹ Minute 11 of the Expert Panel dated 3 June 2026 at paragraph [9].

held by the Panel considering that project.² Accordingly, it appears that the Panel and the EPA have the ability to provide both a recording and a transcript. We also note a detailed conference procedure note was issued to the parties in respect of that hui.³

- 10. We also trust that the Panel has access to a translator so that any written or oral presentation in Te Reo Māori given at the hui is able to be translated into English.
- 11. If the Panel decides not to provide a transcript and recording in respect of the hui, then TIL requests that the recording is of high quality, such that all audio and visual are clearly discernible.

[Redacted]

- 12. [Redacted]

- 13. [Redacted]

DATED this 5th day of June 2026



Stephanie de Groot / Tom Atkins
Counsel for Taharoa Ironsands Limited

² Minute 8 of the Expert Panel for the Taranaki VTM Project dated 10 October 2025; See Section 2: Conferences Procedures of the "Conference Procedures" dated 21 October 2025

³ https://www.fasttrack.govt.nz/data/assets/pdf_file/0019/13663/Taranaki-VTM-Conference-Procedures-21-October.pdf

⁴ [Redacted]