

Before the Fast-track Expert Panel

FTAA-2511-1150

Under the Fast-track Approvals Act 2024 (**FTAA**)

And

In the Matter of an application for approvals by McCallum Brothers Limited for the Te Ākau Bream Bay Sand Extraction Project located at Te Ākau Bream Bay, Northland

**Memorandum of Counsel on behalf of McCallum Brothers Limited Requesting
Resumption of Processing**

Dated 7 August 2026

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May it Please the Expert Panel:

1. This memorandum is presented on behalf of McCallum Brothers Limited (**MBL**), the Applicant for the Bream Bay Sand Extraction Project (**Application**).
2. As stated in Minute 11 the Panel granted MBL's request to suspend the processing of the Application from Tuesday 2 June 2026. The purpose of that suspension was to allow MBL additional time to respond to the numerous comments invited under s 53 of the FTAA.
3. In advance of lodgement of its response to comments, MBL requests the Panel resumes its processing of the Application from 12:00 am on Tuesday 11 August 2026.
4. The response exercise is largely complete and MBL advises it will lodge its response package with the EPA by 11.59pm on Wednesday 12 August 2026. That timeframe aligns with the remaining 2 working days available to MBL to respond to comments under s 55(2) of the FTAA following resumption of processing.



Jeremy Brabant

Counsel for McCallum Brothers Limited

7 August 2026