

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 responding to Minute 15

Dated 22 June 2026

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MAY IT PLEASE THE PANEL

1. We refer to Minute 15 of the Expert Panel dated 10 June 2026.
2. Minute 15 provides details for the Panel Facilitated Conference and first round of expert conferencing on the proposed offset wetland measure.
3. At paragraphs 15 and 18 the Panel requested that parties advise which experts will attend expert conferencing on their behalf and of any feedback on the matters proposed for discussion.
4. In response:
 - (a) TIL confirms that Hamish Dean (author of Appendix K - Terrestrial Ecology – Wetlands and Vegetation Assessment) and Hannah Mueller (author of Appendix M – Terrestrial Ecology – Fauna Assessment) will attend expert conferencing on the proposed offset wetland measure on behalf of TIL.
 - (b) TIL's experts do not have any feedback on the matters proposed for conferencing. They are willing to engage in conferencing on those matters.
5. TIL also notes its previous request to the Panel that the Panel Facilitated Conference is held on the 22nd and 23rd of July 2026 (of the four proposed dates being 20th – 23rd July), after the Panel undertakes a second site visit on 21st July.
6. This is because:
 - (a) TIL is unable to accommodate a site visit on the alternative suggested date for the site visit of 20 July.
 - (b) Accordingly, it makes sense for conferencing to occur across two sequential days (if required) – being the 22nd and 23rd July, rather than intersected by the site visit. This will ensure more cohesive discussion and will limit disruption to those attending the Panel Facilitated Conference in person in Hamilton.

7. TIL understands that the Panel agrees with this proposal.

DATED this 22nd day of June 2026



Stephanie de Groot / Tom Atkins
Counsel for Taharoa Ironsands Limited