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 23 October 2026

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MAY IT PLEASE THE PANEL

1. As you know, we act for Taharoa Ironsands Limited (**TIL**) in respect of the Central and Southern Block Mining Project at the Taharoa Ironsands Mine (**Application**). The Application is currently suspended, with processing due to recommence on 2 November 2026.

2. TIL requests that the Panel exercise its discretion to suspend the processing of the Application in accordance with section 64 of the Fast-track Approvals Act 2024 (**FTAA**) by a further five working days.

3. The further suspension is required for the same reasons as set out in TIL's Memorandum of Counsel dated 15 October 2026 – more time is required for TIL to provide a robust response to the matters set out in that Memorandum, and to provide time for the Panel to consider TIL's response before it issues its draft decision and conditions. In particular, TIL requires more time for its technical advisors (WWLA) to prepare a response to Earthtech's latest report (prepared for the Panel) dated 12 October 2026. This includes WWLA using the additional time to engage directly with Earthtech on key points raised in Earthtech's report.

4. TIL seeks that processing of the Application resume on Monday 9 November 2026 (with the Panel's draft decision and conditions due that day). TIL proposes to provide its response to the matters set out in the Memorandum of Counsel dated 15 October 2026 to the Panel on Monday 2 November 2026. As with the current suspension, this will provide the Panel with a week to consider TIL's responses before its draft decision and conditions are due the day that processing resumes.

5. TIL has no objection to the Panel, its advisers, or the EPA continuing work on the Application during the suspension period.

DATED this 23rd day of October 2026



Stephanie de Groot / Tom Atkins
Counsel for Taharoa Ironsands Limited