



Taharoa Ironsands Ltd

Appendix Z – Summary of consultation and how consultation has informed the application

The Consultation Register (**Appendix Y**) records the correspondence and meetings / hui forming pre-application consultation on our / Taharoa Ironsands Limited's (TIL) substantive application for the Central and Southern Block Mining Project.

As required by section 43(2) of the Fast-track Approvals Act 2024 (FTAA), the table below summarises the feedback that was received from parties and groups that engaged with us / TIL as part of the consultation process, and how that feedback has informed the application. This feedback was provided to us / TIL and our Fast-track application team in written feedback, email correspondence or verbally during consultation meetings.

Topic	Summary of consulted party's feedback	How has the feedback informed the application?
Overall view on the granting of the consents	The Proprietors of Taharoa C Block Incorporated (Taharoa C): <ul style="list-style-type: none"> Taharoa C has provided written consent for the project to be undertaken on its land (which is Māori land) and has provided its consent to the proposed activity described in the archaeological authority application. In providing its written approval for the Project to be undertaken on Māori land, Taharoa C explained that the Mine has brought long-lasting socio-economic benefits to the people of Taharoa. This includes considerable social and economic benefits, including income for the beneficiaries of Taharoa C, local employment opportunities (and high wages) and the provision of community infrastructure, services and housing to support the local village. Overall, Taharoa C support the mining operation and our / TIL's approach. 	<ul style="list-style-type: none"> Cultural and social benefits endorsed: Taharoa C has provided its written approval for the Project to proceed on its land. The benefits that it has cited demonstrate how the project meets the purpose of the FTAA and supports the granting of the approvals sought for a desired term of 35 years. Taharoa C reviewed a final copy of the substantive application and has provided its written approval to the resource consent application component.
	Te Ruunanga o Ngaati Mahuta ki te Hauaaruru Charitable Trust (Te Ruunanga): <ul style="list-style-type: none"> During a consultation hui on 26 September, Te Ruunanga advised that it does not oppose the Project. Te Ruunanga's primary areas of interest were provision of an opportunity to review monitoring information on an on-going basis, and to ensure on-going engagement to discuss monitoring information and other matters relating to the operation of the mine. 	<ul style="list-style-type: none"> Specific concerns: Te Ruunanga's specific concerns have been addressed in our substantive application primarily through conditions of consent (see the detail below for an explanation of the relevant conditions).



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	<p>Roy Wetini Whaanau Trust (Wetini Trust):</p> <ul style="list-style-type: none"> The Wetini Trust supports the granting of the resource consents on the basis of the Commissioner's earlier decision on our consent renewal application, dated 21 November 2024 (2024 RMA Hearing Panel Decision). In its view, the conditions granted by the Commissioners sufficiently mitigate the effects of the mining activity to a level they are comfortable with. It supports these conditions, and specifically the conditions mentioned later in this table. The Wetini Trust has raised the time and resource it has incurred in being involved in TIL's 2024 resource consent process and that based on the outline of our fast-track applications, we have not addressed its concerns. 	<ul style="list-style-type: none"> Panel conditions as a starting point: Consistent with the Wetini Trust's feedback, the set of resource consent conditions imposed in the 2024 Hearing Panel Decision have been used by our Fast-track team as the starting point for proposed conditions of consent for our substantive application. Fast-track process to expedite consenting processes: We understand the Wetini Trust's concerns about time and resource incurred in the reconsenting of the Central and Southern Blocks of the Mine. We have also faced considerable delay, significant expense and investment uncertainty associated with lengthy consenting processes. This is one of the key reasons why we have sought to divert the reconsenting of the Central and Southern Blocks of the Mine to the Fast-track process. We consider that this process will be the most efficient way to complete the reconsenting of the Central and Southern Blocks of the Mine – saving ours and interested parties' time and resource. Specific concerns: The Wetini Trust's specific concerns have been addressed in our substantive application, primarily through conditions of consent (see the detail below for an explanation of the Wetini Trust's specific concerns and how the application addresses them).
	<p>Tahaaroa Lakes Trust (TLT) and Te Kooraha Marae (Te Kooraha):</p> <ul style="list-style-type: none"> TLT and Te Kooraha do not oppose the granting of the resource consents <i>"but seek robust conditions of consent that ensure adverse cultural and environmental effects that arise from the mining activity are avoided, remedied or mitigated"</i>. TLT and Te Kooraha seek that the conditions imposed be "the same, materially similar or stronger conditions" than those included in the 2024 RMA Hearing Panel Decision. TLT and Te Kooraha raised the time and resource they have incurred in providing input into our application to reconsent the Central and Southern Blocks of the Mine (2020 RMA Application) and the sole reason for investing this time was to ensure that <i>"meaningful measures are put in place to mitigate effects of mining activities on ourselves, our future generations, and our enduring connection to our whenua, wai, and the wider environment"</i>. TLT and Te Kooraha consider that the key issues which they spent significant time and resources addressing in their submissions and statements of evidence as part of the 2020 RMA Application resource consent process will not be addressed through the FTAA 	<ul style="list-style-type: none"> See the comments above in respect of the use of the Panel's conditions as a starting point, and how the Fast-track process will expedite consenting processes. Clarification of Fast-track process during consultation: During a consultation meeting with TLT and Te Kooraha on 11 September 2025 our team clarified the Fast-track process and the Panel's scope to seek written feedback on the application from affected parties. It is likely that the Panel will invite TLT to provide feedback given it is an adjoining landowner and potentially affected party. If so, TLT can provide whatever information it wishes to the Panel (provided it relates to the application). Panel composition: We will seek practitioners that are capable of competently assessing all potential effects on the environment to form the Panel. However, the Panel is appointed by the Panel Conveners under the FTAA and not by us. Specific concerns: We have sought to address TLT and Te Kooraha's specific concerns in our substantive application primarily through conditions of consent (see the detail below for an explanation of these concerns and how the application seeks to address them).



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	<p>process and they will have limited input into this process.</p> <ul style="list-style-type: none"> • However, TLT and Te Kooraha noted that consent conditions imposed by the 2024 RMA Hearing Panel Decision would generally achieve their goals. <i>"The decision allowed the benefits from the mine (that TIL now relies on under the Act) to continue, while ensuring environmental, cultural and social effects were avoided, remedied or mitigated".</i> • The Expert Panel for the Fast-track application includes <i>"practitioners capable of competently assessing cultural effects of the proposal".</i> 	
On-going consultation and provision of information	<p>TLT and Te Kooraha:</p> <ul style="list-style-type: none"> • TLT and Te Kooraha sought the reinstatement of consultation conditions imposed in the 2024 RMA Hearing Panel Decision. These conditions included the: <ul style="list-style-type: none"> ○ Requirement to invite listed stakeholders (including TLT and Te Kooraha) to meetings regarding the operation of the mine, no less than once every six months for the first three years following the commencement of the consents and thereafter at yearly intervals or as otherwise determined by the attendees. ○ Requirement to retain a consultation register. ○ Requirement to make the consultation register available to Waikato Regional Council, and to provide them with annual consultation updates. ○ Requirement to establish a website and publish specified information. • TLT and Te Kooraha also sought that the conditions imposed require <i>"meaningful engagement with iwi in the development of management plans and the ongoing operation of the mine... and appropriate compensation for time spent in this engagement"</i>. • TLT and Te Kooraha also sought that hui act <i>"as a genuine and respectful forum for meaningful consultation. It must not merely provide a space for listening but must ensure that our concerns, values, and aspirations are actively acknowledged and meaningfully incorporated into the decision-making process"</i>. Te 	<ul style="list-style-type: none"> • Proposed consultation conditions: The conditions referred to by the TLT and Te Kooraha from the 2024 RMA Hearing Panel Decision have been included in the set of proposed resource consent conditions forming part of our application, with some modifications. The proposed conditions include: <ul style="list-style-type: none"> ○ A requirement for the consent holder to invite listed stakeholders (including TLT and Te Kooraha) to annual meetings. The consent holder is also required to provide a venue and prepare an agenda. The meetings are to be focused on discussing resource management matters relating to the mine, including monitoring undertaken in the period since the last consultation meeting. ○ A requirement to retain a consultation register. ○ A requirement to make the consultation register available to Waikato Regional Council, and to provide them with annual consultation updates. • Proposed website condition: The proposed conditions also include a requirement for a publicly accessible website. The condition requires the website to include the current Annual Works Plan, the Environmental Management Plan, annual monitoring reports and monthly records of water abstraction, lake levels and rainfall data, monthly stormwater discharge records, and dust monitoring data. • Compensation not provided for under the RMA: Section 108(10) of the RMA specifies that conditions of consent cannot require financial contributions unless the condition is imposed in accordance with the purposes and level of contribution specified in a plan or proposed plan; the Waikato Regional Plan does not provide for financial contributions for engagement. Therefore, no compensation has been provided for in our draft conditions of consent. The 2024



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	<p>Kooraha requested “<i>formal hui every 8 to 12 months</i>” which “<i>includes updates on the implementation of consent conditions, open reporting on environmental and cultural impacts</i>”.</p> <ul style="list-style-type: none"> TLT and Te Kooraha sought that: <ul style="list-style-type: none"> any future hui are chaired by a neutral and independent facilitator; and Te Kooraha, Aaruka Marae, Te Ruunanga, and TLT, and other affected mana whenua, are included in all consultation processes throughout the life of any consent. <p>Wetini Trust:</p> <ul style="list-style-type: none"> Greater visibility to ensure we achieve ongoing compliance with consent conditions (particularly rehabilitation) through establishment of a website which can be accessed by mana whenua. <p>Te Ruunanga:</p> <ul style="list-style-type: none"> Te Ruunanga’s primary areas of interest were to be provided with an opportunity to review monitoring information on an on-going basis, and to ensure on-going engagement to discuss monitoring information and other matters relating to the operation of the Mine. 	<p>Hearing RMA Panel Decision confirmed that it had “<i>not identified nor has any party submitted a policy or rule in the plan that provides for such funding or the determination of such funding</i>”. We have not volunteered any conditions of this nature because we already fund a wide range of activities which benefit the community. We regularly consider requests to fund particular initiatives and groups which are put to us in consultation and engagement in the community – our strong preference is to deal with these requests privately.</p> <ul style="list-style-type: none"> Annual Monitoring Report: Our Fast-track team has proposed a condition (Condition 50 – Schedule 1 General Conditions) which requires the consent holder to prepare and submit an Annual Monitoring Report to Waikato Regional Council by 1 August each year that the consent is current. The condition requires the consent holder to provide a copy of the Annual Monitoring Report to key stakeholders, including Te Ruunanga.
Cultural effects	<p>Wetini Trust:</p> <p>As noted, the Trust seeks the conditions imposed by the 2024 RMA Hearing Panel Decision, including:</p> <ul style="list-style-type: none"> Incorporation of a structured framework to mitigate cultural effects of the consent including providing for kaitiakitanga and maatauranga Māori. Visibility on and mana whenua input into the Site Rehabilitation Plan and Conceptual Site Closure Plan. 	<ul style="list-style-type: none"> Conditions of consent: Our Fast-track team has prepared robust set of proposed resource consent conditions that are informed by: <ul style="list-style-type: none"> expert assessments; experience derived from undertaking mining and managing environmental effects on the site over the past 50 years; the practical realities of operating a sand mine in a location exposed to high winds; submissions on our 2020 RMA Application between 2020-2025; feedback obtained via consultation.



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	<p>Te Kooraha and TLT:</p> <ul style="list-style-type: none"> Te Kooraha outlined its cultural connection to the area in written feedback, saying <i>“Cradled in an area at the southern end of Kaawhia harbour, nestled in a hidden valley, a land of profound significance and ancestral connection, is a special place that stands as a testament to the rich heritage of the mana whenua, the people of the land, Te Kooraha Marae. Ko Oorangiwahao te maunga, ko Te Kooraha me Mitwai ngaa awa, ko Te Oohaakii te wharenuui, ko Te Arohanui te wharekai, ko Tuuranga te tuupuna, ko te Tahaaroa a Ruapuutahanga te rohe, ko Ngaati Mahuta ki te Hauaaaru me Ngaati Rangitaka ngaa hapuu, ko Waikato te iwi, paimaarire. Te Kooraha Marae perpetuates an essence, a mauri, a sacred realm where the wind purifies, the black sands whisper genealogical narratives, and the people embody the mantle of wardenship. It is a safe haven where ancient wisdom intertwines with contemporary life, leaving an unforgettable impression on all who traverse through the waharoa”</i>. TLT states that the dune lakes and Wainui stream are <i>“regarded as taonga for their cultural, waahi pakanga and waahi tapu values”</i>. Te Kooraha and TLT provided a copy of Taituwha King's statement of evidence from the 2020 RMA Application. Te Kooraha requested open reporting on cultural impacts of the project with an ability to <i>“reassess”</i> and <i>“where necessary, renegotiate the conditions under which mining operations proceed”</i>. 	<p>We are confident that the conditions of consent will effectively manage any actual and potential adverse cultural and environmental effects on the environment.</p> <ul style="list-style-type: none"> Proposed conditions to provide for kaitiakitanga and maatauranga Māori: Our Fast-track team has proposed a range of resource consent conditions and archaeological authority conditions that provide for tangata whenua to exercise kaitiakitanga and for maatauranga Māori to be incorporated into the site's management of environmental effects. This includes: <ul style="list-style-type: none"> A requirement that the Conceptual Site Closure Plan includes measures to protect existing Māori reserves and ensure access for customary cultural practices is not prevented in the long term; A requirement that the Environmental Management Plan (EMP) must incorporate matauranga Māori and cultural health indicators; and A requirement that in the event that koiwi or archaeological remains are discovered, a local kaumātua must be contacted within 12 hours of discovery and provided an opportunity to undertake karakia or other cultural activity as appropriate in accordance with an Archaeological Management Plan. The Proprietors of Taharoa C Incorporated play a key kaitiaki role: It is important to note that the land on which the Mine is operated is Māori land that is owned by Ngaati Mahuta hapu through the conduit, The Proprietors of Taharoa C Incorporated. The landowners, through their governing body, play a primary kaitiaki role in relation to the operations undertaken on the site – through their position as landlord and through on-going consultation and engagement with us about our activities. As noted above, Taharoa C has provided its written consent for the project to be undertaken on Māori Land – this is have been provided as Appendix D the Substantive Application Report. Taituwha King's statement of evidence appended to the application: A copy of Taituwha King's statement of evidence has been appended to the Substantive Application Report as Appendix HH. Mr King's statement is considered in the cultural effects section of the Substantive Application Report (as part of the Assessment of Environmental Effects (AEE) at 8.1.18. Review conditions: At a hui with TLT and Te Kooraha Marae on 11 September, our Fast-track team discussed the ability for the conditions of consent to be reviewed under the RMA if there were effects of concern in the future that had not been appropriately managed by the consent conditions (including cultural effects). A review condition has been included in our proposed resource consent conditions as part of the substantive application.



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	Te Ruunanga: <ul style="list-style-type: none"> During a consultation hui on 26 September, a Te Ruunanga representative noted that his grandfather had blessed parts of the Mine before they had been entered. He explained that Te Ruunanga wanted to take a pragmatic approach to the Mine, as their whaanau had done. He conveyed that Te Ruunanga would appreciate if mining operations could take into account when there is a tepūpuka (gathering) and the marae are being used for a tangihanga (Māori funeral), or burials are taking place at the Urupa, provided that the marae advised the operation that there was something going on. 	<ul style="list-style-type: none"> Adjustment to works to take into account of tepūpuka, tangi and burials at the urupa: When we met, we advised Te Ruunanga that we are mindful of these ceremonies and were open to making adjustments to our work or the timing of works out of respect. Our view is that these matters are best understood as a neighbourly relationship rather than something that needs to be formalised. This approach reflects a shared understanding and goodwill between neighbours and is most appropriately managed through ongoing dialogue.
	Waitomo District Council (WDC): WDC advised that Ngaati Mahuta have published their own environmental management plan that will need to be considered as part of our substantive application.	<ul style="list-style-type: none"> Assessment included in Substantive Application Report: We agree that an assessment is required against the Ngaati Mahuta Environmental Management Plan. An assessment against the Plan has been included as Appendix AA to the Substantive Application Report - the project is generally consistent with the plan.
Setbacks	Wetini Trust: <ul style="list-style-type: none"> As noted, the Trust seeks the conditions imposed by the 2024 RMA Hearing Panel Decision, including setbacks (100m from the Mitiwai Stream, 200m from third-party adjoining properties and 100m from all natural inland wetlands). The Trust noted that no technical documents have been provided that would support a 30m setback from the Mitiwai Stream which is "contrary to recommendations of experts" as part of the 2020 RMA Application process and is inconsistent with the 100m setback required under conditions contained in the 2024 Hearing Panel Decision. 	<ul style="list-style-type: none"> Appropriate setbacks have been proposed by the Trust that are not more onerous than necessary to address effects: <ul style="list-style-type: none"> We have considered the matter of setbacks extensively with our technical advisors. Mining setbacks from perennial waterbodies (30 m) and MHWS (100 m) have been incorporated into our proposed conditions of consent. However, the additional setbacks sought by the Trust, which stem from the 2024 RMA Hearing Panel Decision, have not been incorporated given that the various technical specialist reports that support this application have not identified any effects-based reasons for those setbacks to be applied. The technical specialists have recommended a range of measures to mitigate potential effects on adjacent properties, surface water bodies and natural inland wetlands – the blunt management tool of applying increased setbacks is not needed when other mitigation measures are being applied to manage effects. This matter also needs to be considered in light of the significant operational and economic impact of applying large setbacks across the site. The value of the iron product increases towards water bodies, and the quantity of material that would be lost from the proposed setback areas (in volume and



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		<p>economic terms) will significantly impact our ability to fill ships and meet customer commitments and deliver the economic and other benefits that have been forecasted. We have calculated that a 100m setback around the perimeter of the site (excluding the Northern Block boundary and 100m coastal setback) would reduce the mine's potential revenue by over \$1.5 billion over a period of 35 years.¹</p> <ul style="list-style-type: none"> It is therefore important for the on-going operation of the Mine that setbacks are not imposed beyond what we have proposed. To do so would be inconsistent with the requirement under the FTAA that conditions are not more onerous than necessary to address the reason for which those conditions are set (section 83, FTAA).
Rehabilitation	<p>Wetini Trust:</p> <ul style="list-style-type: none"> In the Trust's view, our approach to rehabilitation is not adequate. The Trust considers that we have not shown that we are successfully rehabilitating the site following mining. This is a concern to the Trust, as well as resultant amenity and dust effects. The Trust seeks: <ul style="list-style-type: none"> <i>"Inclusion of conditions of consent that highlight the importance of rehabilitation in managing air quality effects which are a priority for us given our close proximity to the mine".</i> <i>"Visibility on and mana whenua input into the Site Rehabilitation Plan and Conceptual Site Closure Plan".</i> <p>TLT and Te Kooraha:</p> <ul style="list-style-type: none"> In the groups' view, we have not implemented rehabilitation as required under prior consents which has created an environment that was never anticipated when the consents were granted in 2006. These consent breaches have exacerbated effects on the whenua, waterbodies and of particular significance recently - air quality. 	<ul style="list-style-type: none"> Concerns about site rehabilitation acknowledged: We acknowledge the groups' views about rehabilitation but respectfully disagree with their assessment of rehabilitation progress. There is no condition in our existing resource consents which dictate the amount of rehabilitation that we are required to achieve each year, nor is there a set amount of rehabilitation anticipated in the 'indicative timeframes' section of our current Rehabilitation Plan. Our approach to rehabilitation is set out in further detail in the Substantive Application Report at Section 4.18 and the Key Issues Table attached to the Substantive Application Report at Appendix G. Proposed rehabilitation conditions: Our proposed resource consent conditions provide for effective rehabilitation and site closure by requiring progressive interim and final rehabilitation to be undertaken in accordance with a Site Rehabilitation Plan, consistent with our existing consents. However, our Fast-track team has proposed more detailed conditions that will require the Plan to: <ul style="list-style-type: none"> include details of site preparation and plant establishment measures for proposed planting; provide for habitat suitable for bittern and long-tailed bats (as well as NZ pipit); include details of areas proposed to be temporarily and permanently contoured; include procedures to monitor and report to WRC on progress made in

¹ This calculation is based on the assumption that there is a 100m setback around the perimeter of the Central and Southern Block, the average mining depth is 50m, the perimeter is 11km (along the Mitiwai and around the eastern boundary of the Central and Southern Block (excluding the western boundary along the CMA already subject to a 100m setback and the Northern Block boundary), there are 2.8 tonnes of product per m³ of headfeed, approximately 20% yield and approximately 50% usable material.



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	<ul style="list-style-type: none"> • They seek a decision that includes consent conditions at least as strong as those proposed in the 2024 Hearing Panel Decision. These include Conditions 11, 24, 25, and 40 to 52 within Schedule 1, and Conditions 9(b), 11, 12, and 13 in the General Conditions of resource consent number AUTH142035.01.01. • Further, that rehabilitation and closure plans must be clearly defined and enforceable. 	<p>delivering the procedures and measures required by the Site Rehabilitation Plan;</p> <ul style="list-style-type: none"> ○ include a timeline for interim rehabilitation of the areas within 100-200m of the Consent Area boundary once mining has been completed; ○ include a description of permanent rehabilitation of completed mining areas in the Te Ake Ake mining cell in the north of the Central Block adjacent to the Mitiwai Stream, including methods that seek to provide visual screening of mining operations in the Central Block from the existing dwelling on the properties legally described as Taharoa A1C7A Block (the Wetini property); and ○ be prepared with input from a suitably qualified and experienced landscape architect, who shall advise on landform and groundcover, taking into account the requirements of the Conceptual Site Closure Plan. <ul style="list-style-type: none"> • Conditions imposed by the RMA Panel have largely been adopted: Conditions 11, 24, 25, and 40 to 52 within the Schedule 1 General Conditions, and Condition 9(b) and 11, in resource consent number AUTH142035.01.01 have been adopted in our proposed resource consent conditions, with some changes (as explained below). Conditions 12 and 13 in resource consent number AUTH142035.01.01 have not been adopted (as explained below): <ul style="list-style-type: none"> ○ replacing condition 11 in consent AUTH142035.01.01 with a similar priority stabilisation condition (explained below) which appropriately relates to the boundary with sensitive receptors, rather than all boundaries. ○ conditions 12 and 13 in AUTH142035.01.01 which required us to complete rehabilitation within a certain timeframe and require us to rehabilitate 63 ha of the Site within two years in addition to usual rehabilitation have been removed. These conditions have not been adopted because they do not recognise the practical realities of operating the mine. The proposed rehabilitation obligations are unrealistic and unachievable due to the significant time and resources required for sourcing plants, seasonal planting, and site preparation. Final rehabilitation of large areas of the Mine is also inefficient when those areas may be re-mined in the future. ○ replacing conditions 40 – 52 in the Schedule 1 General conditions with a new environmental bond condition. We have proposed an amended bond condition which recognises that this is an ongoing operation (so includes a transitional period) and recognises the appropriate form and content for a bond. • Priority stabilisation area: air quality expert has recommended a 100m Priority



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		Stabilisation Area. This has been worked into our proposed conditions of consent. It is intended to address, as a priority, stabilisation of the 100m area near the boundary of the Central Block adjoining the nearest sensitive receptors within three months of mining ceasing anywhere in that area, to reduce the potential for off-site dust effects associated with mining in that area.
Term of the resource consents	Waikato Regional Council (WRC): <ul style="list-style-type: none"> WRC considers that our proposed consent term of 35 years is appropriate. 	<ul style="list-style-type: none"> We are seeking a term of 35 years.
Bond	TLT: <ul style="list-style-type: none"> The Trust requested that the resource consents include a requirement for the payment of a Bond. 	<ul style="list-style-type: none"> Proposed bond condition: We have included a requirement for a bond is our proposed set of resource consent conditions.
	Wetini Trust: <ul style="list-style-type: none"> As noted, the Trust seeks the conditions imposed by the 2024 RMA Hearing Panel Decision, including the requirement for the payment of a Bond. 	
Compliance	Wetini Trust: <ul style="list-style-type: none"> The Trust seeks <i>"Greater visibility to ensure TIL achieve ongoing compliance with consent conditions (particularly rehabilitation) through establishment of a website which can be accessed by mana whenua"</i>. 	<ul style="list-style-type: none"> Proposed website condition: We have included a requirement for a publicly accessible website in our proposed set of resource consent conditions. The condition requires that we maintain a public website that shares key environmental and operational information, including plans, monitoring data, water and rainfall records, maps, and community engagement materials. The website must also include procedures for lodging complaints.
	TLT: <ul style="list-style-type: none"> TLT raised concerns regarding alleged non-compliances from 2019-2025. 	<ul style="list-style-type: none"> Good record of compliance: We have a good compliance history, especially for the size of the operation and the harsh / challenging coastal environment in which the Mine is located. Section 2.10 of the Substantive Application Report provides a summary of compliance or enforcement actions taken against us. The actions are in relation to one-off events which have all been remedied, and steps have been taken by us to ensure that a similar incident does not occur again.
	Te Kooraha: <ul style="list-style-type: none"> Te Kooraha raised concerns regarding alleged non-compliances from 2019-2025. It noted in particular, our 'failure' to: <ul style="list-style-type: none"> <i>"implement rehabilitation as required under these consent"</i> 	<ul style="list-style-type: none"> See the comments above in respect of our record of compliance and approach to rehabilitation. See the comments below in respect of the presence of Hornwort weed in the Wainui Stream.



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	<p><i>conditions".</i></p> <ul style="list-style-type: none"> o <i>"detect and act upon the presence of this invasive species as required by their consent conditions".</i> 	
Fish screens and Wainui Stream	<p>TLT and Te Kooraha:</p> <p>Both groups:</p> <ul style="list-style-type: none"> • Raised an alleged incident relating to the functioning of the mesh screens enclosing the water intake pumps at the dam on the Wainui Stream in March 2025, affecting eels. • Raised concerns about the alleged introduction and spread of <i>Ceratophyllum demersum</i> (Hornwort) in the Wainui Stream. • Sought the incorporation of a condition which specifies mesh screen requirements where water is extracted from the Wainui Stream Reservoir. • Sought the establishment of a Mesh Screen Condition Monitoring and Maintenance Plan. • Sought the incorporation of the entirety of the General Conditions outlined in resource consent number AUTH142035.03.01 in any new resource consents pertaining to the Wainui Stream and Fish Passage. 	<ul style="list-style-type: none"> • Proposed fish passage conditions: Our fish passage and infrastructure has proven effective, particularly in supporting upstream movement of fish species. Our Fast-track team has proposed the following resource consent conditions to ensure that the fish passage remains effective: <ul style="list-style-type: none"> o Inclusion of the fish pass operation condition from the 2024 RMA Hearing Panel Decision, ensuring ongoing maintenance and functionality; o Inclusion of the fish pass monitoring condition from the 2024 RMA Hearing Panel Decision requiring a monitoring programme to confirm effectiveness for juvenile fish species, with regular reporting; o Maintenance of residual flow through the fish pass to support aquatic life; and o A requirement for the consent holder to review and update the existing Wainui Stream Enhancement Plan in consultation with Waikato Regional Council, Department of Conservation, The Proprietors of Taharoa C Block Incorporation, Taharoa Lakes Trustees, Te Ruunanga o Ngaati Mahuta ki te Hauaaaru, Te Kooraha Marae and Aaruka Marae, to improve indigenous biodiversity values in the lower Wainui Stream. • Proposed fish screen mesh size: We are seeking to retain the existing size of the mesh on the water intake screen. Fish populations have increased since we assumed operations, and there is no requirement under the Waikato Regional Plan to reduce mesh size. Issues with the fish passage are more likely due to maintenance rather than screen design and are addressed through maintenance conditions. Replacing the screens is also not a straightforward process and would require significant infrastructure changes and expense. Further information is provided on this matter in the key issues table at Appendix G to the Substantive Application Report. • Hornwort in Wainui Stream managed on an on-going basis: <ul style="list-style-type: none"> o We are aware of and actively manage the presence of Hornwort weed in the Stream. TLT identified Hornwort within the Wainui Stream during monitoring in November 2024. Weed was removed from behind the dam in December 2024, but had rapidly re-accumulated by March, before TLT undertook a



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		<p>further survey in April 2025.</p> <ul style="list-style-type: none"> ○ This aquatic pest is unrelated to mining operations and is a known regional issue. It is classified as an Unwanted Organism under the Biosecurity Act 1993 and is managed by WRC under that regime. ○ Due to rapid growth, we monitor and remove weed regularly to prevent damage to the water intake screens and ensure uninterrupted flow. ○ Our proposed conditions also include a requirement that we update the existing Wainui Stream Enhancement Plan in consultation with key stakeholders “for the purposes of improving the indigenous biodiversity values associated with the lower Wainui Stream”. <ul style="list-style-type: none"> ● No compliance action taken by WRC regarding a complaint relating to the functioning of mesh screens enclosing the water intake pumps in March 2025: <ul style="list-style-type: none"> ○ We are aware of a complaint made to WRC regarding tuna mortality on 25 March 2025. Despite reaching out to WRC for further details, limited information was provided, and the complaint could not be identified. WRC investigated the incident by requesting further information from us (which is noted below), and did not take any further action as a result. ○ In March 2025, excessive Hornwort weed build-up behind the dam caused blockages in the gland water system. Remedial action was taken to remove the weed, including diver inspections, which identified a small gap in the water intake screen and a hole in the concrete below the screen. Temporary repairs were made using steel wiring and cloth, followed by permanent repairs on 25 March 2025. We took appropriate steps to remedy the situation in an appropriate timeframe and acted as soon as the issue was identified. ○ Our team regularly checks the dam and associated infrastructure for weed build up, as it can cause damage to the water intake screens which keep aquatic life, weed and debris from being sucked into the gland water system. If anything gets caught up in the system, it damages the multistage pumps and causes seal failures which result in significant operational downtime and repair costs. ○ While eels have occasionally entered the water extraction system, we have always responded promptly mitigate these events. Preventing these events is in our operational interests as it can damage pumps and cause costly downtime.



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	<p>Te Ruunanga:</p> <ul style="list-style-type: none"> During a consultation hui with Te Ruunanga, a representative commented that when they had been down to the bottom of the Wainui Stream for years there were no mullet at all, but they are now there on mass. The representative noted that she had observed that they clump together and swim around erratically at the bottom of the Wainui, and it is difficult to know why. 	<ul style="list-style-type: none"> Fish pass monitoring and maintenance to ensure effectiveness: As above, we agree that the fish pass has proven to be effective in ensuring the passage of grey mullet, particularly following its upgrade in 2010. Our proposed resource consent conditions will include a requirement for a fish pass monitoring programme to be developed in consultation with key stakeholders to ensure the effectiveness for juvenile fish species, with regular reporting. This will enable tracking of the trends.
Mitiwai Stream	<p>TLT:</p> <ul style="list-style-type: none"> TLT noted that the works are in close proximity to a culturally significant awa, the Mitiwai Stream, and raised a concern that <i>"no detailed information has been provided regarding the effects of groundwater diversion or whether a specific resource consent will be sought for the diversion of the Mitiwai Stream"</i>. <p>Te Kooraha:</p> <ul style="list-style-type: none"> Te Kooraha is concerned about the potential for ecological degradation of the Mitiwai Stream from an environmental and cultural identity perspective. It has noted that the works thus far have included <i>"the removal of much of a ridgeline that once separated occupied whaanau land from mining operations, and activities have taken place in close proximity to the culturally significant Mitiwai Stream"</i>. Te Kooraha expressed concern about the degradation of the Mitiwai Stream, stating that the stream <i>"embodies the life force—mauri—that spiritually and physically connects our people to the land, the waters, and the sea."</i> and that <i>"The health of the Mitiwai is inseparable from the wellbeing of our whaanau and hapuu."</i> Te Kooraha considers that our installation of a <i>"four-barrelled culvert, ... has disrupted the stream's natural flow, resulting in significant sand accumulation that now blocks three of the barrel"</i> and raises concerns about the natural baseflow being compromised by <i>"groundwater diversion into the large open pits currently operating within 30 metres of the Mitiwai Stream in the"</i> 	<ul style="list-style-type: none"> The effects identified (if any) on the Mitiwai Stream have been determined to be short-term and less than minor from a hydrogeology perspective: We have engaged an independent expert to carry out additional investigative work as part of the preparation of our substantive application which resulted in this assessment. See Section 8.1.5 of the Substantive Application Report for more information. We have responded to TLT's concerns by way of letter to the Te Kooraha Marae Trustees and TLT on 17 September 2025, making the following key points: <ul style="list-style-type: none"> We intend to maintain the existing 30-metre setback along the Mitiwai Stream through planting and buffer zones, reflected in our proposed resource consent conditions; There is the potential for dredge mining in the North of the Central Block to generate a short term reduction in flows in the Mitiwai Stream. As a result, the stream will be monitored and augmented if flows fall below baseline minimum flows calculated from monitoring of the stream level for more than a year. The effect (if any) is expected to be short-term with baseline stream flow returning approximately 15 months after mining begins. We acknowledge comments about the cultural significance of the Mitiwai Stream and our Fast-track team has taken Mr King's CIA into account in preparing the application.



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	<p><i>Central Block</i>".</p> <ul style="list-style-type: none"> Te Kooraha seeks consent conditions that safeguard the Mitiwai Stream, ensuring it remains clean, safe, and healthy for current and future generations. 	
Water use	<p>TLT:</p> <p>TLT raised concern at the "75% increase in ship loading frequency" and the assertion that "the Northern Block project will rely on existing water intake and discharge consents". It noted that "the summary does not address the potential impacts of increased ship loading on water usage and discharge volumes, nor does it provide details on whether the current limits are adequate or if adjustments will be necessary".</p>	<ul style="list-style-type: none"> No increased in maximum ship-loading events or water use: As explained in our substantive application, we are not proposing to increase the volume of our existing water usage or seek greater discharge volumes – we are proposing to work within our existing consented parameters. However, there may be a progressive increase in the frequency of ship-loading over time compared to current levels – but this is not a change outside of our existing consent limits.
Interaction with groundwater	<p>WRC:</p> <ul style="list-style-type: none"> WRC advised of the importance to include the water take activity associated with any proposed wet mining on the site within the scope of the application. 	<ul style="list-style-type: none"> Agreement reached on consents required: WRC has confirmed its agreement that resource consents sought for diversion of groundwater and surface water take associated with this activity, as applied for in our application, is appropriate. WRC was also of the strong view that a third resource consent sought for this activity as part of our application, for the discharge of contaminants to surface water, may be a permitted activity under Rule 3.5.44 of the WRP. However, a consent for this activity has been sought as part of this application out of an abundance of caution. Further information on this matter is set out in our Substantive Application Report.
Archaeology Authority Application	<p>Taharoa C:</p> <ul style="list-style-type: none"> Taharoa C has provided its written consent to the Archaeological Authority Application. In reviewing the Archaeological Authority Application and associated documents, Taharoa C requested some changes to our "Taharoa Mine Site Health and Safety - Environmental Procedure: Discovery of Human Remains and/or Items of Cultural Significance", to add for a requirement for us to inform Taharoa C as well as the Police if any bones are discovered, and to provide Taharoa C with a copy of any archaeological records prepared. Taharoa C also provided a Māori cultural values report for the 	<ul style="list-style-type: none"> Environmental Procedure: Discovery of Human Remains and/or Items of Cultural Significance Updated: We have updated this Procedure as requested by Taharoa C. This updated Procedure is referenced in the Archaeological Management Plan prepared for the Archaeological Authority Application.



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	<p>purposes of the Archaeological Authority Application which noted the following:</p> <p><i>In line with our values, the accidental discovery protocols and the ability to exercise our own tikanga within these protocols have now been formalised into a draft Archaeological Management Plan. The continuation of these protocols and regular mining plan updates maintains integrity of the relationship between TIL and the Proprietors of Taharoa C Incorporation. This will ensure that the significant cultural values associated with the Taharoa C Block are recognised and provided for and the adverse effects of ongoing mining excavation activity on those values are mitigated and appropriately managed.</i></p>	
	<p>Te Ruunanga and Te Kooraha Marae:</p> <p>These parties were provided with a copy of the draft Archaeological Application (Application), Cultural Values report, Archaeological Assessment Report (Report) and Archaeological Management Plan (AMP) to review in advance of lodgement.</p> <p>Overall, these parties seek that the resource consent conditions imposed by 2024 RMA Hearing Panel Decision, and currently under appeal by TIL, are replicated or otherwise that the conditions are agreed. They have also made a range of other requests including request for information, involvement and oversight in management processes and archaeological investigations.</p> <p>A detailed summary of this feedback is attached to the Archaeological Authority Application.</p>	<ul style="list-style-type: none"> Clough & Associates have considered the feedback provided by Te Ruunanga and Te Kooraha Marae (with input from TIL) and have responded in detail to this feedback in an attachment to the Archaeological Authority Application (as Appendix A). This summary explains how the feedback has informed that application.
Scheduling of ship-loading events	<p>Harbourmaster:</p> <p>Maritime NZ considers that:</p> <p><i>TIL will need to ensure they maintain their systems and processes to manage navigation safety risks with a focus on:</i></p> <p>(a) <i>Ensuring appropriate scheduling to reduce risks to the ships calling at the SBM due to the ability for the SBM to only handle one vessel at a time, including appropriate management of vessels if weather conditions deteriorate.</i></p> <p>(b) <i>Ensuring any increase in scheduled ship calls does not affect the</i></p>	<ul style="list-style-type: none"> Existing systems present no risks: We already have systems and processes in place to manage navigation safety risks – including if poor weather conditions mean that our ships are unable to call at the SB, and regular maintenance of the SBM and mooring infrastructure. We have an excellent navigation safety record. However, we will take the Harbourmaster's comments into account moving forward.



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	<i>existing maintenance plans for the SBM and mooring infrastructure.</i>	
Air discharge consent	<p>WRC:</p> <ul style="list-style-type: none"> WRC initially advised that it considers an air discharge consent is required for the Central and Southern Blocks of the Mine. This is because it is considered that Permitted Activity Rule 6.1.16.1 - Mineral Extraction, Size Reduction, Screening and Storage is not being met for air discharges associated with the site given the proximity the works are located to the adjacent properties...and recent enforcement processes undertaken by WRC with respect to recent air discharge events. 	<p>Air discharge consent not required:</p> <ul style="list-style-type: none"> Our air quality expert has considered the ability of the project to comply with Rule 6.1.16.1 and considers that the rule can be complied with, and that an air discharge consent is not required for the Central and Southern Blocks (see the Air Quality Assessment attached as Appendix S to the Substantive Application Report). In addition, no air discharge consent was required as part of the 2020 RMA Application. Our Fast-track team has volunteered a range of conditions to manage dust effects and ensure that permitted activity air discharge Rule 6.1.16.1 is adhered to. We have explained our position to WRC, and they are seeking policy advice, and have not yet confirmed their position on this matter. To address this point of potential disagreement with WRC, the scope of our resource consent application includes an application for an air discharge consent if the Panel determines that such a consent is required. However, we continue to be of the view that an air discharge consent is not required.
National direction	<p>Ministry for the Environment (MfE):</p> <ul style="list-style-type: none"> MfE stated that as part of our substantive application, <i>"it will need to provide an assessment of the project against any relevant national policy statement, national environmental standards and if relevant the New Zealand Coastal Policy Statement"</i>. MfE provided a list of directions that we need to consider. 	<ul style="list-style-type: none"> Assessment of national direction: T&T has undertaken an assessment against the relevant planning documents listed by MfE – which is included in the Substantive Application Report.
Plan Changes	<p>Waitomo District Council:</p> <ul style="list-style-type: none"> WDC advised that it notified the decisions version of the Proposed Waitomo District Plan (PWDP) on 19 June 2025. WDC stated that <i>"depending on what provisions are appealed when you lodge your substantive application it is likely that a number of the PDP provisions will be operative."</i> 	<ul style="list-style-type: none"> PWDP considered in Assessment of Environmental Effects: The relevant provisions of the decisions version of the PWDP and operative Waitomo District Plan have been considered in the assessment of environmental effects accompanying our resource consent application, as appropriate.
Access	Te Kooraha:	<ul style="list-style-type: none"> This matter relates to works within the Northern Block and is outside of the scope of this application: The condition referred to by Te Kooraha Marae



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	<ul style="list-style-type: none"> Te Kooraha has advised on <i>ongoing issues with roading access to their marae— which remains unresolved despite requests for assistance and resourcing over the past eight weeks</i>. Te Kooraha noted that our representatives agreed that <i>“the paa road leading to Te Kooraha Marae would be maintained as part of the ongoing works associated with Pit 1 in the Northern Block”</i>. Te Kooraha stated that we have only undertaken roading works as far as the Mitiwai Stream <i>“ensuring their trucks and vehicles have a well-maintained route”</i> while leaving the road leading to Te Kooraha marae in poor condition. They noted that access has become unviable via both the first and second access roads. Te Kooraha also state that we have not carried out any maintenance on the agreed section of road leading to the paa. Te Kooraha has pointed to a condition in our Pit 1 resource consent which required that <i>“The consent holder must maintain vehicle access around the site to Te Kooraha Marae at all times”</i>. Te Kooraha has sought a clear, enforceable condition be embedded in any new consents, requiring the immediate and ongoing maintenance of the marae access road to ensure safe, reliable access for our community at all times. 	<p>relates to the resource consent for Pit 1, in the Northern Block and is outside the scope of this application. Additionally, in a letter to Te Kooraha Marae dated 15 September 2025, we recognised that maintenance of the road is ultimately Taharoa C's responsibility (as landowner). However, we are willing to assist in facilitating discussions with Taharoa C about the issue and we have offered to assist with physical works where appropriate. We suggested that a time be arranged with a representative of Taharoa C, to assess the condition of the road and what maintenance way be required.</p>
Approach to consultation on Fast-track application	<p>TLT & Te Kooraha:</p> <p>In response to our invitation to engage in consultation, and following a hui held between us/TIL, TLT and Te Kooraha on 11 September 20205, TLT and the Te Kooraha Marae Trustees have criticised our approach to consultation. Their remarks include:</p> <ul style="list-style-type: none"> Our consultation letter lacked clarity around the scope of work, extent of work and spatial context proposed within the southern and central mining areas. We have not provided a final version of the application and supporting reports (including the Site Rehabilitation Plan, the AEE, a comprehensive discussion of cultural effects, detailed information about the effects of groundwater diversion, details about the potential impacts of increased ship loading on water usage and discharge volumes, and whether the current limits are adequate or if adjustments will be necessary). Further, that there was no comprehensive discussion of cultural effects in the information 	<p>TLT and Te Kooraha's comments on this matter do not relate to the substance of our application and therefore are not captured by the requirement of section 43(2) of the FTAA. However, for completeness it is noted that we have responded to and/or addressed all of these comments:</p> <ul style="list-style-type: none"> A hui was held, as requested: A hui was held with TLT and Te Kooraha on 11 September 2025. We initially proposed two separate hui to enable representatives at each hui an opportunity to speak engage – however, the TLT representatives elected to attend the hui with Te Kooraha. The hui finished earlier than intended. Our view is that it was ended appropriately after unacceptable comments were made by one of the attendees representing both TLT and Te Kooraha to our Managing Director and CEO. Information has been provided about the application, and we have regularly communicated about the timing of when further information and the application will be available: <ul style="list-style-type: none"> We originally reached out to TLT and Te Kooraha in April and June of 2025 to discuss our substantive Fast-track application. At the outset of the consultation process, we provided TLT and Te Kooraha with a seven-page



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	<p>provided.</p> <ul style="list-style-type: none"> • TLT had not received an initial invitation to meet with us to discuss its views. Both requested a meeting as well as: <ul style="list-style-type: none"> ○ A copy of the proposed draft consent conditions and AEE for TLT to provide comments on before the application is lodged. ○ An opportunity to review and make comments on the summary of consultation we have prepared, and for these comments to be provided as part of our substantive application. ○ Clarification on the proposal (including clearly defined maps). ○ Additional time to “provide written comments directly to the Expert Panel under s53 of the Act after we have reviewed the substantive application, and proposed conditions”. • The timeframes we have imposed for TLT and Te Kooraha to review the information relating to the substantive Fast-track application are unreasonable and inconsistent with the Ngaati Mahuta EMP, which requires the early provision of information, adequate timeframes and dialogue to ensure informed participation by mana whenua. • In respect of the hui on 11 September 2025 and future hui: <ul style="list-style-type: none"> ○ The Ngaati Mahuta ki te Hauaauru Environmental Management Plan, Huri Taiaawhio ko Ngaati Mahuta E (Ngaati Mahuta EMP), requires engagement processes to be conducted with respect, balance and transparency. ○ Mana whenua has the role of determining hui format. ○ All attendees must be respected. ○ Tikanga does not permit us / TIL to cancel or close a hui. Hui are collective space where mana whenua must be respected, and closure belongs to the collective, not an applicant. ○ TLT and Te Kooraha decided to be united in attendance at the 11 September hui and this should not be contested by TIL. ○ TLT and Te Kooraha did not consider that the Chair of the 11 September hui acted in accordance with tikanga or the principles of the Ngaati Mahuta EMP – they request a neutral 	<p>summary of the application.</p> <ul style="list-style-type: none"> ○ At the hui, our team clarified the proposed scope of work, extent of work and spatial context of the project, with reference to maps. We also explained how the application is substantively similar to what it sought through the 2020 RMA Application, which TLT and Te Kooraha Marae were involved in. ○ Following the hui, we provided specific commentary in writing to TLT in respect of key areas of interest that were not discussed (letter dated 17 September 2025). ○ We advised TLT and Te Kooraha on several occasions that we were not in a position to provide the final application documents when we initially reached out to TLT to consult on the project and at the time of the hui – the documents were still in development. This is commonly the case when consultation is undertaken in respect of a prospective application. ○ We advised TLT and Te Kooraha that we would provide a copy of the application (including technical reports and management plans) as soon as it was ready to be shared, and before the application was lodged. However, there would likely be limited time for us to receive comments on the application documents from TLT and Te Kooraha prior to lodgement. ○ As promised, we provided a copy of the draft Archaeological Authority Application to Te Kooraha on 9 October 2025 for feedback prior to filing of the application. Te Kooraha advised that it would not be able to provide feedback until 30 October. Te Kooraha provided its feedback on that application on 24 October 2025, as explained above. We also provided a full copy of the application documents to TLT and Te Kooraha on 31 October 2025. TLT and Te Kooraha were provided an updated copy of the application on 5 December 2025 which included with minor amendments in response to the original application being returned by the EPA. • Time pressure: We have explained to TLT and Te Kooraha Marae that: <ul style="list-style-type: none"> ○ The appeal of the 2024 RMA Hearing Panel Decision (Environment Court Appeal) is on hold with the Environment Court until the Fast-track application is lodged and accepted for processing and TIL withdraws existing resource consent application under the RMA. ○ Interested Parties to the Environment Court Appeal have requested that the substantive application is progressed as quickly as possible to avoid a drawn-out process, which we have been attempting to do. ○ We have therefore been under time pressure to complete our application and consultation as soon as possible and consistently with our commitments to



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	<p>and independent Chair to facilitate any future meetings.</p>	<p>the Environment Court.</p> <ul style="list-style-type: none"> • Clarity provided on the Fast-track process: <ul style="list-style-type: none"> ○ At the hui on 11 September, our consenting team explained the Fast-track process. ○ In response to the comments made about the time to provide written feedback on our substantive application: under section 54(5) of the FTAA, there is no right for any person to seek a waiver of the time limit for written comments to be received by the EPA. We would like our Fast-track application processed as quickly as possible, to provide future investment certainty, and so as not to delay processing of our application any further (which consultant parties and groups have advised has put them to substantial cost and resource). Therefore, we do not intend to place the processing of our application on hold to enable additional time. • Consultation summary: We have not shared this consultation summary with TLT or Te Kooraha as this is not a requirement of the FTAA. • Approach to 11 September hui and future hui: <ul style="list-style-type: none"> ○ Prior to the hui on 11 September, we indicated that we would be guided by Te Kooraha on any tikanga that Te Kooraha would like to be observed at the hui. We also acknowledged Te Kooraha's request that the maataapono in Ngaati Mahuta's Environmental Management Plan guided the hui. This was passed on to all attendees on behalf of TIL, who were asked to observe this request. ○ We agree that The Ngaati Mahuta ki te Hauaauru Environmental Management Plan, Huri Taiaawhio ko Ngaati Mahuta E (Ngaati Mahuta EMP), requires engagement processes to be conducted with respect, balance and transparency. ○ We agree that all attendees at hui must be respected and that hui should function as a genuine and respectful forum for discussion. ○ We do not agree with the way in which TLT and Te Kooraha have characterised the hui on 11 September, including TLT's attendance, and we have advised both parties of this. ○ We do not agree with TLT and Te Kooraha's position that TIL should not be able to end a consultation meeting if there has been a breach of the agreed meeting protocols or it is inappropriate for the hui to progress. ○ We consider we should have a key role in deciding on the format of future



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	<p>Wetini Trust:</p> <ul style="list-style-type: none"> In response to our initial invitation to engage in consultation, and following a meeting held between us / TIL and the Wetini Whaanau on 16 June 2025, the Wetini Trust advised that the consultation summary provided in relation to the Fast-track applications did not contain sufficient detail to satisfy the Wetini Whaanau's concerns because we had not indicated any specific actions to respond to its concerns. The Wetini Whaanau wrote to us and expressed their view that the hui held on 16 June 2025 with us did not constitute consultation and was not meaningful. Their remarks included: <ul style="list-style-type: none"> Further information was not provided to confirm how the concerns that the Wetini Whaanau had raised would be addressed within the Fast-track application and conditions of consent. The Wetini Trust did not consider that they were able to have direct and open discussions with our consultants during the hui. The Wetini Trust was not provided with a copy of the conditions or application to review and would not be given a copy with sufficient time to provide input. 	<p>hui relating to our operations, including topics for discussion and key logistical matters such as location, timing, attendees etc, and that this would be consistent with tikanga.</p> <ul style="list-style-type: none"> Summary of the application: At the outset of the consultation process, we provided the Wetini Trust with a seven-page summary of the application. This was intended to provide an overview of the Project, including for parties who were not aware of the Project. At the time the summary was shared, and throughout consultation, our Fast-track team has been developing our substantive Fast-track application. Approach of 16 June hui: <ul style="list-style-type: none"> This hui was intended to enable further discussion with the Wetini Trust about their feedback on the application – as our substantive application was still being prepared. We were not in a position to provide the complete application and conditions in June. This was because consultation was intended to inform the application, and it was still under development. We advised the Wetini Whaanau that we would provide a copy of the application (including technical reports and management plans) as soon as it was ready to be shared, and before the application was lodged. However, there would likely be limited time us to receive comments on the application documents prior to lodgment. We provided a full copy of the application documents to the Wetini Trust, as promised, on 31 October 2025. We provided an updated copy of the application on 5 December 2025 which included minor amendments in response to the original application being returned by the EPA. Specific concerns: The Wetini Trust's specific concerns about our activities are well known – they are set out in their written feedback in response to our initial invitation for feedback, the Wetini Trust was involved in the previous consenting process for the Central and Southern Blocks under the RMA, and key concerns were raised by the Wetini Trust at the 16 June hui. This has enabled us to ensure that the substantive application has been informed by, and respond to, their concerns. The specific ways the application responds, are detailed above.