

Statement of Evidence in Chief of Tara Anderson on behalf of Trans-Tasman Resources Ltd

Statement of Evidence of Dr Tara Julie Anderson

Filed on Behalf of Kiwis Against Seabed Mining and Greenpeace Aotearoa Limited

Dated 6 October 2025

Figures

1. Updated information on rocky reef occurrence in the STB

Substratum types (standardised by area surveyed)

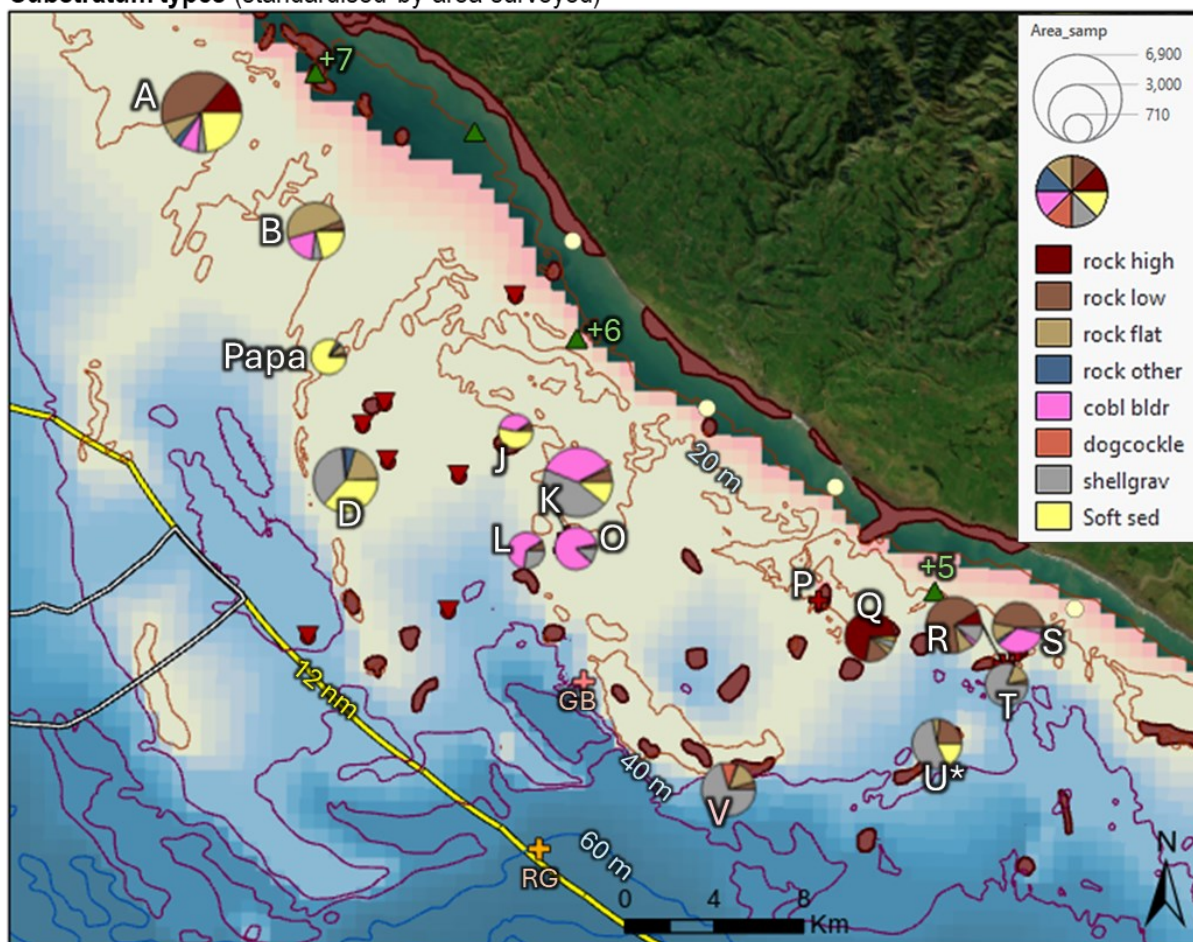


Figure 1. Substratum types (standardised by area surveyed) for the 14 verified rocky reefs – Sites A-V (data from Table 4 of Morrison et al. 2022). Brown polygons – depict the slightly revised National DOC Rocky Reefs layer. Red inverted triangles – rocky reefs sites from Beaumont et al. (2015); Green Triangles (Sites +5, 6 and 7) – rocky reef sites from Anderson et al. (2015). RG and GB depict the location of the Rolling Grounds and Grahams Bank, respectively. Site K=Project Reef; Site P and Q = North and South Traps, respectively; White polygon offshore of the 12nm = PPS. Background colours reflect the depth contours 11-69 m. U* = habitat data did not = 100% (30.6% unaccounted for).

Rock types (standardised by reef-area)

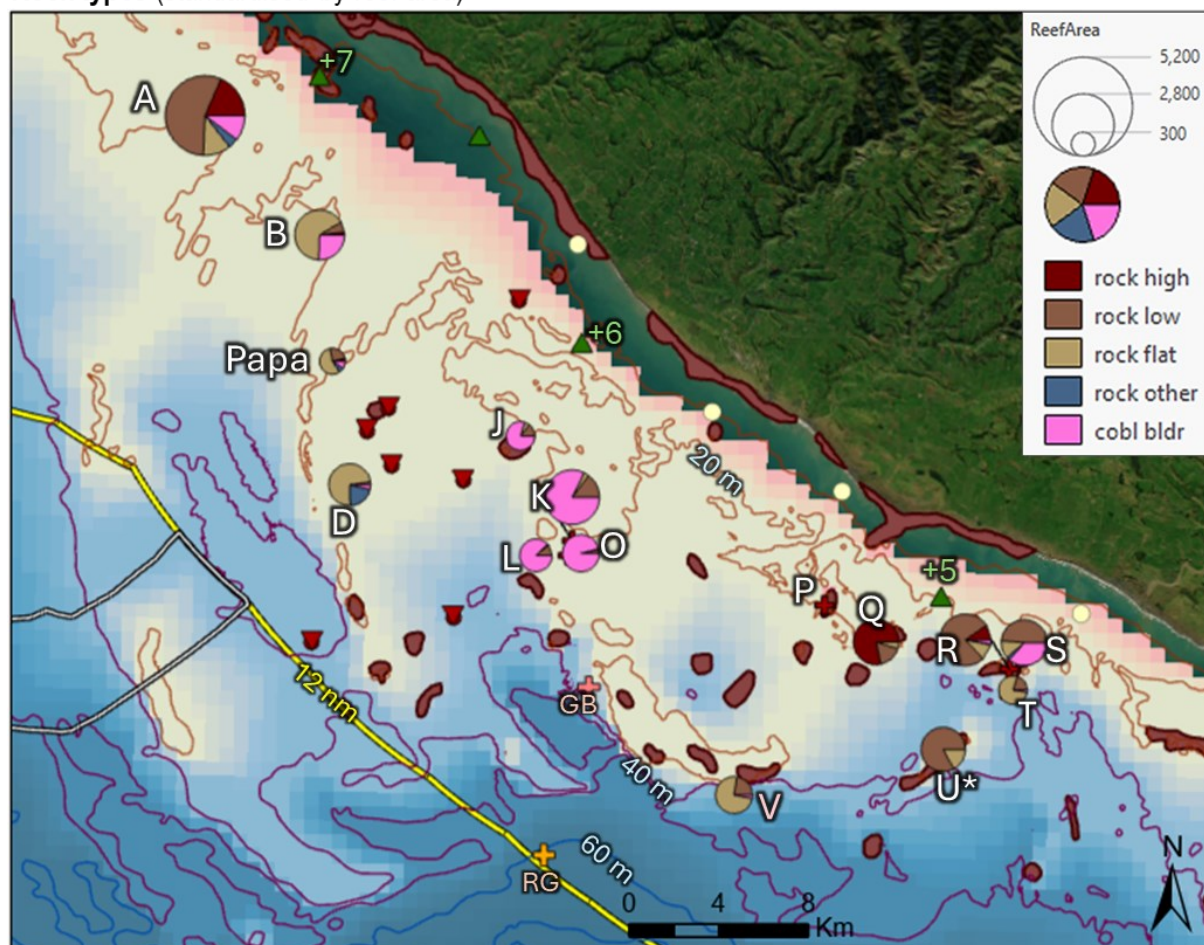
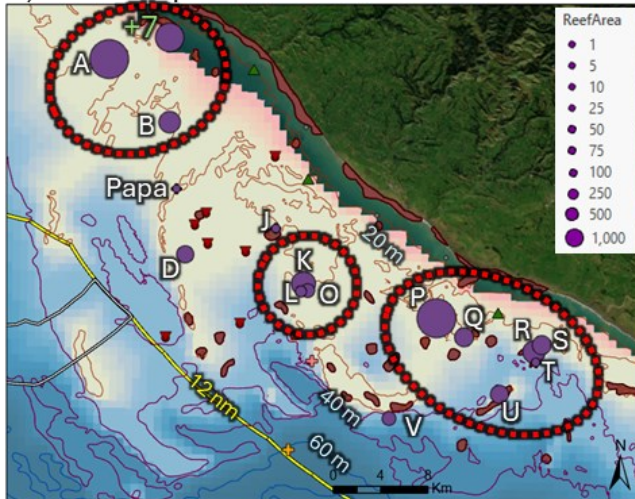
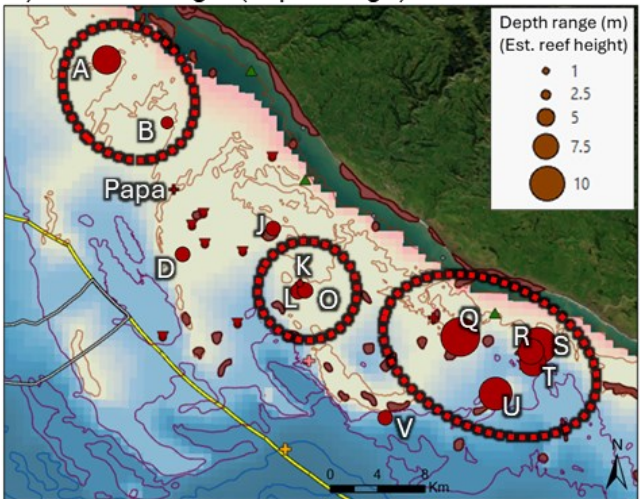


Figure 2. Rock types (standardised by reef-area) for the 14 verified rocky reefs – Sites A-V (data from Table 4 of Morrison et al. 2022). Brown polygons – depict the slightly revised National DOC Rocky Reefs layer. Red inverted triangles – rocky reefs sites from Beaumont et al. (2015); Green Triangles (Sites +5, 6 and 7) – rocky reef sites from Anderson et al. (2015). RG and GB depict the location of the Rolling Grounds and Grahams Bank, respectively. Site K=Project Reef; Site P and Q = North and South Traps, respectively; White polygon offshore of the 12nm = PPS. Background colours reflect the depth contours 11-69 m. U* = habitat data did not = 100% (30.6% unaccounted for).

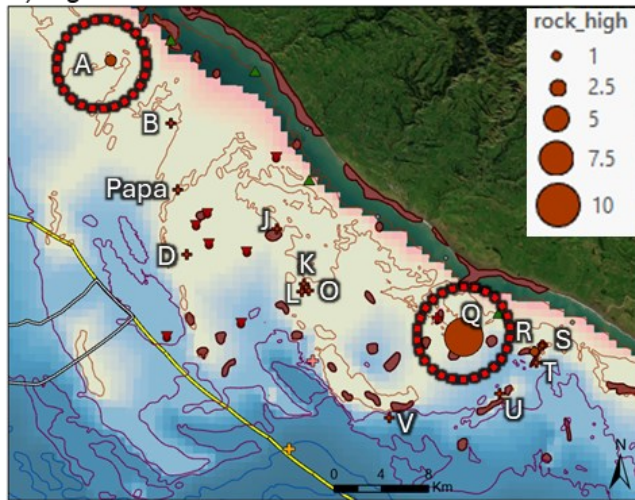
a) Reef area per site



b) Est. reef height (depth-range)



c) High-relief rock



d) Low-relief rock

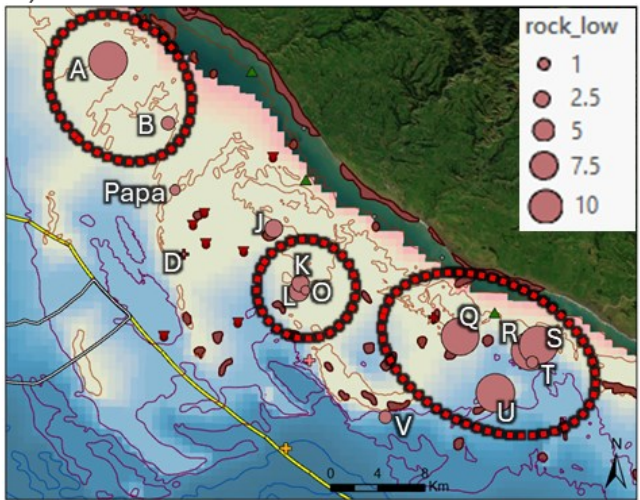


Figure 3. Reef parameters for the 14 verified rocky reefs – Sites A-V (data from Tables 4 and 6 of Morrison et al. 2022). Brown polygons – depict the slightly revised National DOC Rocky Reefs layer. Red inverted triangles – rocky reefs sites from Beaumont et al. (2015); Green Triangles (Sites +5, 6 and 7) – rocky reef sites from Anderson et al. (2015). Orange cross = Rolling Grounds; mauve cross = Grahams Bank (see Figure 1 above for better detail). Site K=Project Reef; Site Q = South Traps (north Traps was not surveyed); White polygon offshore of the 12nm = PPS. Background colours reflect the depth contours 11-69 m. Red dotted circles are included simply to draw attention to site patterns.

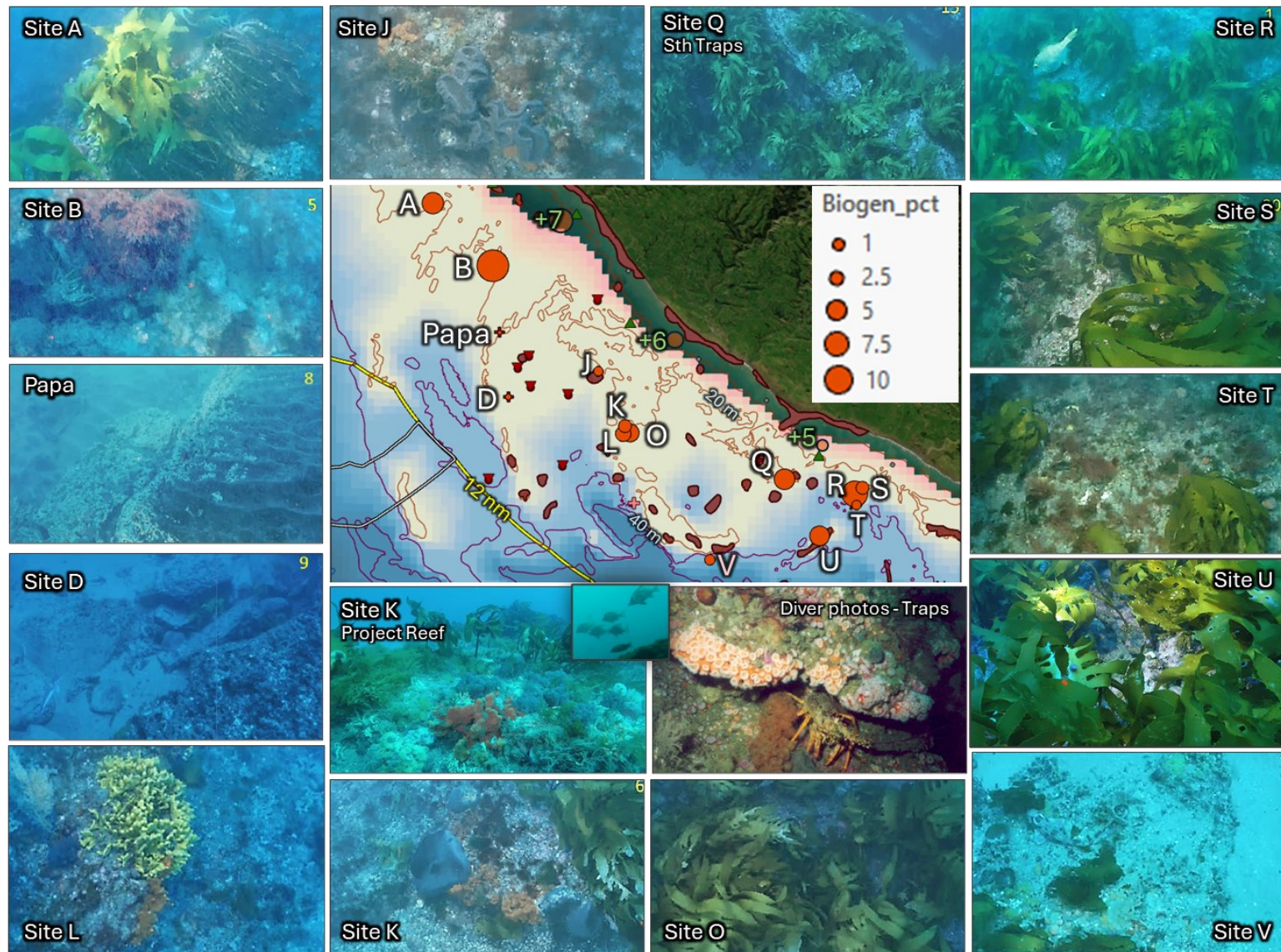
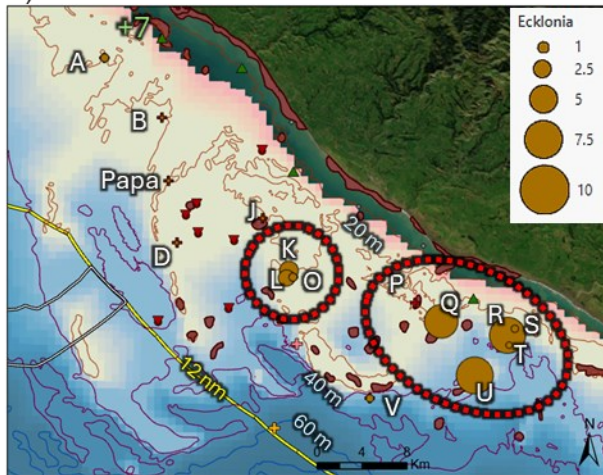
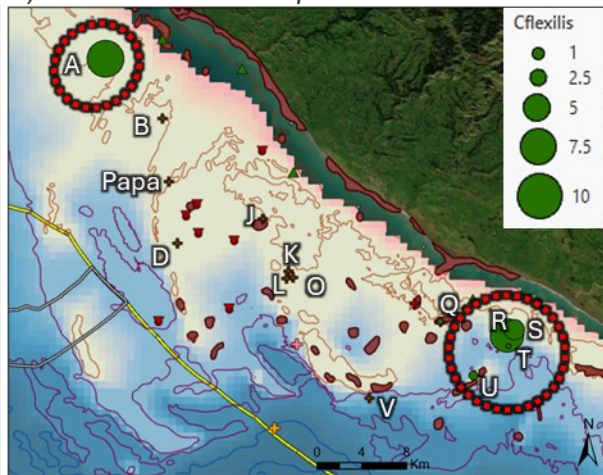


Figure 4. Photographic examples for the 14 verified rocky reefs (Sites A-V) in relation to the spatial distribution of Biogenic habitats (% cover) (photos and data [from Table 6] are from Morrison et al. 2022). Brown polygons – depict the slightly revised National DOC Rocky Reefs layer. Red inverted triangles – rocky reefs sites from Beaumont et al. (2015); Green Triangles (Sites +5, 6 and 7) – rocky reef sites from Anderson et al. (2015). GB = Grahams Bank. Site K=Project Reef; Site Q = South Traps; White polygon offshore of the 12nm = PPS. Background colours reflect the depth contours 11-69 m.

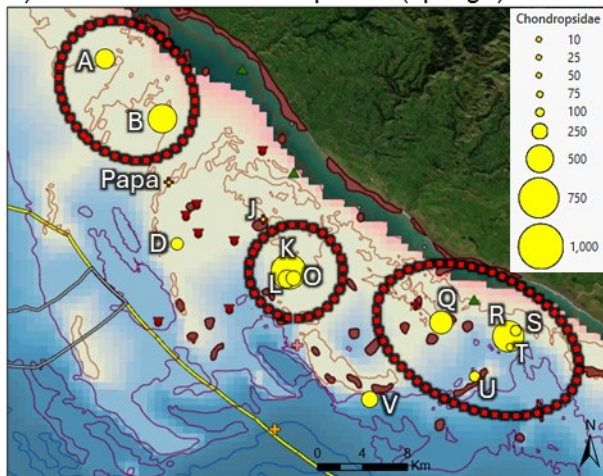
a) Occurrence of *Ecklonia radiata*



b) Occurrence of *Caulerpa flexilis*



c) Occurrence of Chondropsidae (sponge)



d) Occurrence of *Crella* (sponge)

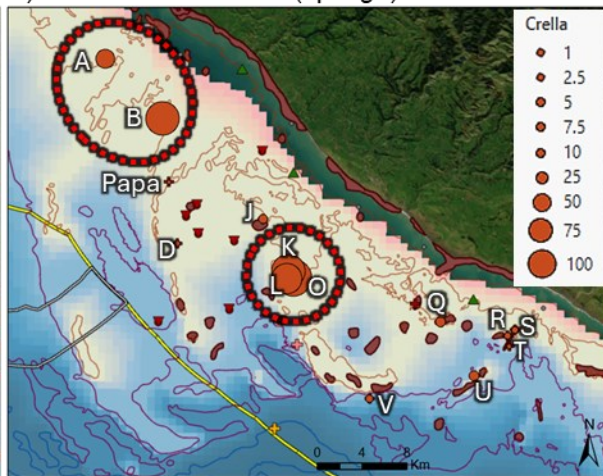


Figure 5. The spatial distribution and occurrence of four dominant biogenic taxa recorded from the tow-video survey of the 14 verified rocky reefs – Sites A-V (data from Tables 6 and 7 of Morrison et al. 2022). Brown polygons – depict the slightly revised National DOC Rocky Reefs layer. Red inverted triangles – rocky reefs sites from Beaumont et al. (2015); Green Triangles (Sites +5, 6 and 7) – rocky reef sites from Anderson et al. (2015). Orange cross = Rolling Grounds; mauve cross = Grahams Bank (see Figure 1 above for better detail). Site K=Project Reef; Site Q = South Traps (north Traps was not surveyed); White polygon offshore of the 12nm = PPS. Background colours reflect the depth contours 11-69 m. Red dotted circles are included simply to draw attention to site patterns.

Demersal fish counts for the five most abundant fish species

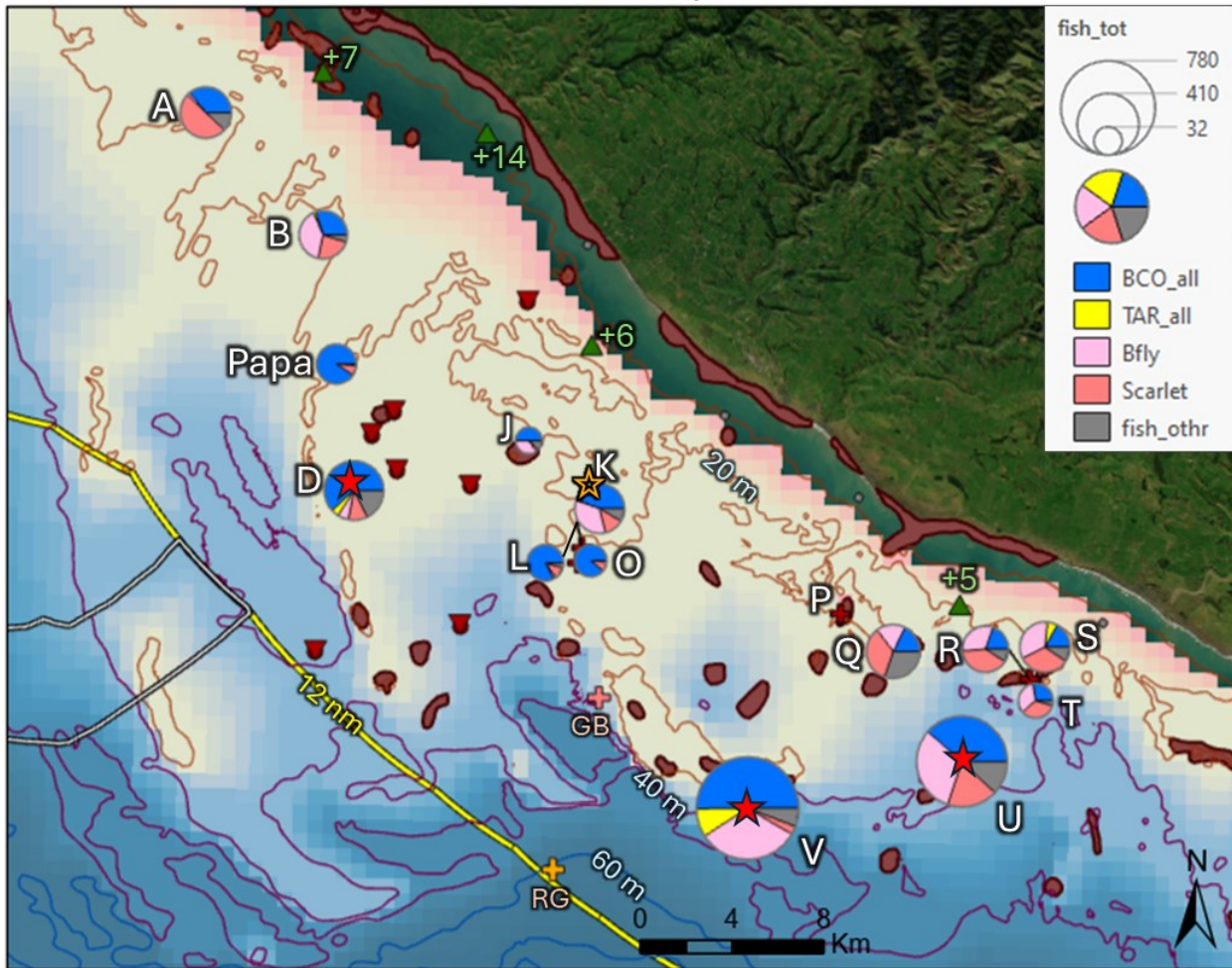


Figure 6. Demersal fish counts recorded from the tow-video survey of the 14 verified rocky reefs – Sites A-V (data from Table 8 of Morrison et al. 2022). BCO-all = blue cod (all sizes); TAR-all = Tarakihi (all sizes); Bfly = Butterfly perch; Scarlet = Scarlet wrasse; fish-othr = all other demersal fish species combined. Brown polygons – depict the slightly revised National DOC Rocky Reefs layer. Red inverted triangles – rocky reefs sites from Beaumont et al. (2015); Green Triangles (Sites +5, 6, 7 and 14) – rocky reef sites from Anderson et al. (2015). Orange cross = Rolling Grounds; mauve cross = Grahams Bank (see Figure 1 above for better detail). Site K=Project Reef; Site Q = South Traps (north Traps [Site P] was not surveyed); White polygon offshore of the 12nm = PPS. Background colours reflect the depth contours 11-69 m. Red stars depict the blue cod nursery areas, while the orange star depicts a limited area of blue cod nursery habitat.

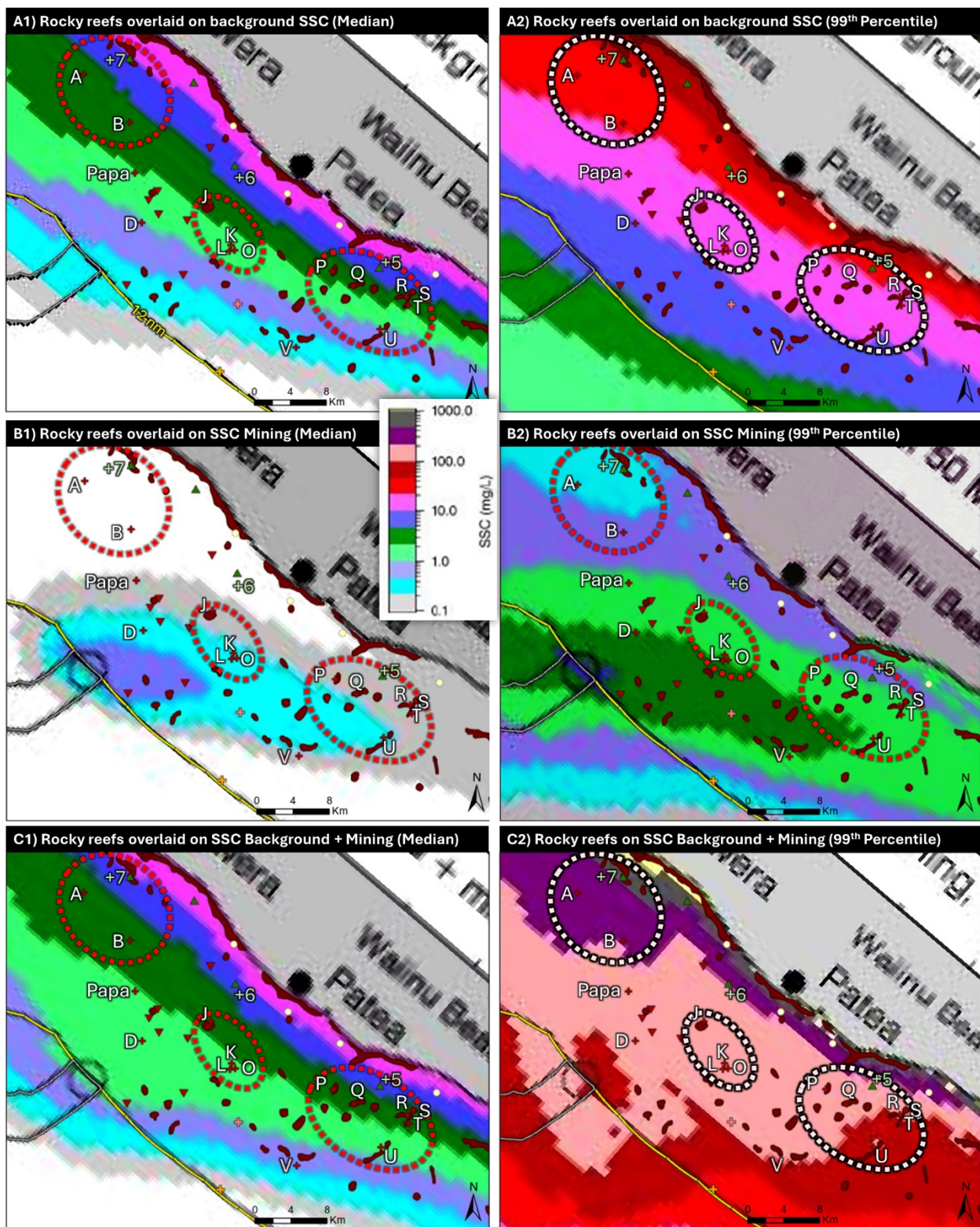


Figure 7. Rocky reef locations (Sites A-V from Morrison et al. 2022), overlaid on the modelled plumes (median and 99th percentile) for background, mining, and combined scenarios (models geo-rectified from Figures presented in Dr MacDonald's EPA Hearing presentation [2024, Day2]). Brown polygons – depict the slightly revised National DOC Rocky Reefs layer. Red inverted triangles – rocky reefs sites from Beaumont et al. (2015); Green Triangles (Sites +5, 6 and 7) – rocky reef sites from Anderson et al. (2015). Orange cross = Rolling Grounds; mauve cross = Grahams Bank (see Figure 1 above for better detail). Site K=Project Reef; Sites P and Q = North and South Traps, respectively; White polygon offshore of the 12nm = PPS. Background colours reflect SSC levels (shown in the legend). Red/white dotted circles are included simply to draw attention to the three main clusters of rocky reefs.