

APPENDIX A: Abbreviations used

1992 Settlement Act	Treaty of Waitangi (Fisheries Claims) Settlement Act 1992
AAQG	New Zealand Ambient Air Quality Guidelines
AAQS	Ambient Air Quality Standards
ACE	Annual Catch Entitlement
AIS	Automatic identification system
Amateur regulations	Fisheries (Amateur Fishing) Regulations 2013
BEMP	Benthic Ecology Management Plan
BFS	Bankable feasibility study
BNZ	Biosecurity New Zealand
Capex	Capital expenditure
CBA	Cost benefit analysis
CEV	Cape-sized export vessel
CGE	Computable general equilibrium
CMA	Coastal marine area
DCM	Discounted Cashflow Model
DIDO	Drive In-Drive Out
DP	Dynamic positioning
EDS	Environmental Defence Society
EEMP	Environmental Monitoring and Management Plan
EEZ	New Zealand's Exclusive Economic Zone
EEZ Act	Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012
EEZ Regs 2013	Exclusive Economic Zone and Continental Shelf (Environmental Effects—Permitted Activities) Regulations 2013
EEZ Regs 2015	Exclusive Economic Zone and Continental Shelf (Environmental Effects—Discharge and Dumping) Regulations 2015
EPA	Environmental Protection Authority
FIFO	Fly In-Fly Out
Forest and Bird	Royal Forest and Bird Protection Society of New Zealand

FMA	Fisheries Management Area
FSO	Floating storage and offloading vessel
FTAA	Fast-Track Approvals Act 2024
FTE	Full-time equivalent
GDP	Gross domestic product
GHG	Greenhouse gas
Greenpeace	Greenpeace Aotearoa Incorporated
HMS	Highly migratory species
I-O	Input-Output
IMMA	Important Marine Mammal Area
IMV	Integrated mining vessel
ITLOS	2024 International Tribunal for the Law of the Sea
IUCN	International Union for Conservation of Nature
JERA	JERA Nex BP Limited Parkwind
JWS	Joint witness statement
Kaimoana Regulations	Fisheries (Kaimoana Customary Fishing) Regulations 1998
KASM	Kiwis Against Seabed Mining Incorporated
Kupe JV	Beach Energy Limited and its joint venture partners
M	Million
MACA Act	Marine and Coastal Area (Takutai Moana) Act 2011
MCACS Act	Maori Commercial Aquaculture Claims Settlement Act 2004
MFA	Māori Fisheries Act 2004
MIO	Mandated iwi organisation
MMMP	Marine mammal management plan
MPB	Microphytobenthos
NIWA	National Institute of Water and Atmospheric Research (now Earth Sciences New Zealand)
NZCPS	New Zealand Coastal Policy Statement
NZTCS	New Zealand Threat Classification System

Opex	Operational expenditure
OSPM	Operational Sediment Plume Model
PCEMP	Pre commencement environmental monitoring plan
PFS	Taranaki VTM Project Pre-Feasibility Study Offshore Iron Sands Project, Siecap dated 25 March 2025.
Project	Taranaki VTM project
Project area	Describes sufficient space for all project related operations including extraction, re-deposition, anchor handling, and grade control drilling
PSGE	Post settlement governance entity
PTS	Permanent threshold shift
QMA	Quota management areas
QMS	Quota management system
RFR	Right of first refusal
RFI	Request for information
RMA	Resource Management Act
SEMMP	Seabird effects mitigation and management plan
SEL	Sound exposure levels
SIA	Social Impact Assessment
SMD	Sediment model domain
SSC	Suspended sediment concentration
SPL	Sound pressure levels
STB	South Taranaki Bight
Te Ohu Kaimoana	Te Ohu Kaimoana Trustee Limited
TEV	Total economic value
TMP	Threat management plan
Treaty JSW	Joint Statement of Witnesses: Treaty Settlements and Cultural Effects (20 November 2025)
TRG	Technical review group
TTRL	Trans-Tasman Resources Limited
TTS	Temporary threshold shift

UNCLOS	United Nations Convention on the Law of the Sea
VHF	Very high frequency
VTM	Vanadiferous titanomagnetite

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APPENDIX B: Glossary of Te Reo Māori terms used

Te Reo term	definition / explanation	Source
hapū	Sub-tribe or kin group that is linked by a common ancestor.	Māori Land Court glossary
hui	To gather, congregate, assemble, meet	Te Aka Māori Dictionary
kai	Eat, food, dine	Te Aka Māori Dictionary
kaimoana	Seafood, shellfish	Te Aka Māori Dictionary
kaitiakitanga	Means the exercise of guardianship by the tangata whenua of an area in accordance with tikanga Māori in relation to natural and physical resources; and includes the ethic of stewardship	RMA statutory definition (s 2).
kanohi ki te kanohi	Face to face, in person	Te Aka Māori Dictionary
ki uta ki tai	Recognising the connections across landscape, people and ecosystems. Literally translated as "From the mountains to the sea"	Te Aka Māori Dictionary
mahinga kai	Customary and contemporary gathering and use of naturally occurring and cultivated foods	Te Aka Māori Dictionary
mana	Commonly referred to as "authority", "power" or "right"; and (in tikanga framing) mana can be based on whakapapa.	Law Commission Tikanga Report
manaakitanga	The practice of nurturing relationships, showing respect, generosity and care for others.	Law Commission Tikanga Report
mana moana	Authority over the sea and lakes - although this is a modern term, the concept of	Te Aka Māori Dictionary

Te Reo term	definition / explanation	Source
	authority over lakes and parts of the sea (<i>mana o te moana</i>) is traditional. According to Māori custom, land rights extended as well to adjacent sea or lakes with fixed boundaries for inshore and deep-sea fishing and the gathering of seafood.	
mana whenua	Means customary authority exercised by an iwi or hapū in an identified area	RMA statutory definition (s 2).
marae	Traditional and contemporary gathering places	Te Aka Māori Dictionary
mātaītai	Seafood, shellfish	Te Aka Māori Dictionary
mātauranga Māori	Māori knowledge - the body of knowledge originating from Māori ancestors, including the Māori world view and perspectives, Māori creativity and cultural practices. In its simplest form, it uses kawa and tikanga to critique, examine and understand the world.	Māori Land Court glossary
maunga	Mountain, mount, peak.	Te Aka Māori Dictionary
mauri	Life force / vital essence that sustains	Law Commission Tikanga Report
moana	Sea, ocean, large lake	Te Aka Māori Dictionary
pātaka	Storehouse raised upon posts, pantry, larder.	Te Aka Māori Dictionary
rāhui	A process that formally restricts access to an area or resource, for a period of time, often to protect or recover resources.	Law Commission Tikanga Report

Te Reo term	definition / explanation	Source
raupatu	Confiscation, conquered, overcome. Often used in relation to forceful land acquisition	Te Aka Māori Dictionary
rangatiratanga	Chieftainship, right to exercise authority, chiefly autonomy; self-determination, sovereignty, dominion, leadership.	Te Aka Māori Dictionary
rohe moana	A customary fishing area	MPI definition for customary fishing
takutai	Sea coast, coast, shore.	Te Aka Māori Dictionary
takutai moana	Coast, foreshore and seabed	Te Aka Māori Dictionary
Tangaroa	<i>Atua</i> of the sea and fish,	Te Aka Māori Dictionary
tangata kaitiaki/tiaki	Means any person appointed as Tangata Kaitiaki/Tiaki under these regulations, being a member of the tangata whenua or a tangata whenua organisation or their notified representative	Fisheries (Kaimoana Customary Fishing) Regulations 1998
tangata whenua	Means in relation to a particular area, means the iwi, or hapū, that holds mana whenua over that area	RMA statutory definition (s 2).
tangihanga	Funeral, rites for the dead - one of the most important institutions in Māori society, with strong cultural imperatives and protocols.	Te Aka Māori Dictionary
tapu	Sacredness / restriction: used as part of a tikanga system (including having different expressions depending on context).	Law Commission Tikanga Report
taonga	Property/possessions; also, treasure, anything prized (including culturally valued resources/ideas).	Te Aka Māori Dictionary

Te Reo term	definition / explanation	Source
taonga species	Native birds, plants, and animals of cultural significance	Te Aka Māori Dictionary
tauranga ika	Fishing ground	Te Aka Māori Dictionary
tauranga waka	Means canoe landing sites	RMA statutory definition (s 2).
tikanga Māori	Means Māori customary values and practices	RMA statutory definition (s 2).
Treaty of Waitangi (Te Tiriti o Waitangi)	Has the same meaning as “Treaty” in s 2 of the Treaty of Waitangi Act 1975	RMA statutory cross-definition (s 2).
wāhi tapu	A place sacred to Māori in the traditional, spiritual, religious, ritual, or mythological sense	Heritage New Zealand Pouhere Taonga Act 2014
wai	Water	Te Aka Māori Dictionary
wairua	Spirit	Te Aka Māori Dictionary
wānanga	Tribal knowledge, lore, learning	Te Aka Māori Dictionary
whakapapa	Genealogy: a layered record of relationships linking humans and the natural world; a basis for identity and obligations.	Law Commission Tikanga Report
whanau	Extended family, family group,	Te Aka Māori Dictionary
whanaungatanga	Relationships based on kinship, shared experiences and obligations that create belonging.	Law Commission Tikanga Report
Whata (as part of pataka supply)	Storage place (The customary supply/distribution system name)	Te Aka Māori Dictionary (Ngati Maru)

APPENDIX C: Procedural History

Date	Activity
22 April 2025	TTR lodges an application under the Fast Track Approvals Act 2025 with the EPA
15 May 2025	EPA completes completeness assessment under section 46
29 May 2025	EPA completes assessment under section 47, application is passed to the Panel Convener
10 June 2025	A section 51 report is requested by the Panel Convener from the EPA as the relevant administering agency
16 June 2025	The Ministry for the Environment provided the Fast-track team with the section 18 report on Treaty settlements and other obligations
7 July 2025	Panel Convener Conference held
12 August 2025	Panel Convener appoints the Taranaki VTM Expert Panel and sets the decision timeframe.
25 August 2025	Taranaki VTM Expert Panel commences
	Minute 1 issued - Project overview conference
2 September 2025	Minute 2 issued - Further details about the project overview conference
	Overview conference takes place
8 September 2025	Minute 3 issued - Invitation to comment under section 53 of the Fast-track Approvals Act 2024
	Invitations to comment under section 53 are issued
19 September 2025	Further invitations to comment under section 53 are issued to Ngā Motu Marine Reserve Society and Te Tōpuni Ngārahu Trust
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	Minute 4 issued:
	- Appointment of Legal Counsel and Decision Writer
	- Additional parties to be invited to comment
	- Acceptance of additional application documents.
24 September 2025	Further invitations to comment under section 53 are issued to additional fishing clubs based along the southern coastline of the Whanganui-Manawatu region
22 September 2025	Section 51 report from the EPA is received
24 September 2025	Minute 5 issued - Additional parties to be invited to comment
26 September 2025	Minute 6 issued - Further observations on appointment of legal advisor, and request for information from applicant for response to s 51 report from EPA
6 October 2025	Comments under section 53 close.
7 October 2025	Minute 7 issued - A late comment from the Minister for Māori Crown Relations and for Māori Development was received
10 October 2025	Minute 8 issued - Planned conference in Hāwera
	Minute 9 issued - Further information request from iwi and hapū
	Minute 10 issued - Further information request from the Minister for Oceans and Fisheries
13 October 2025	Applicants' response to comments are received
21-23 October 2025	Conference in Hawera is held
4 November 2025	Advance notice of legal issues hearing and hearing procedures issued
	Minute 11 issued - Advance notice of a hearing

	Minute 12 issued - Further information request from iwi and hāpu
	Minute 13 issued - Further information request from the applicant
	Minute 14 issued - Further information request regarding benthic habitats and species
	Minute 15 issued - Further information request regarding marine mammals
	Minute 16 issued - Further information request regarding birds
	Minute 17 issued - Further information request regarding fish
5 November 2025	Minute 18 issued - Accepting the late report filed by Ngāti Ruanui Trust
	Minute 19 issued - Expert caucusing and joint witness statements
10 November 2025	Minute 20 issued - Request for information, expert conferencing, and Joint Witness Statement regarding economics
11 November 2025	Hearing notice issued
	Targeted peer review of Information on Underwater Generated Noise from the Taranaki VTM Project published on the Fast Track website
	Minute 21 issued - Response to letter from Ngāti Haua and Ngāruahine regarding timeframes for information and expert caucusing
	Minute 22 - Appointment of Technical Advisor on underwater noise
13 November 2025	Expert Conferencing on sediment distribution modelling held
	Minute 23 issued - Extensions provided to the requests for information outlined in Minutes 13 - 17
17 November 2025	Expert Conferencing on effects on benthic habitats and species held
	Minute 23 issued - Acceptance of late submissions by Te Tōpuni Ngārahu Trust
18 November 2025	Expert Conferencing on the fate of tailings backfill held
19 November 2025	Expert Conferencing on Economic effects held
20 November 2025	Expert Conferencing on Effects on Birds held
20 November 2025	Expert Conferencing on Effects on Marine Mammals held
20 November 2025	Expert Conferencing on Treaty Settlements and Cultural Effects held
24 November 2025	Expert Conferencing on Primary Productivity held.
25 November 2025	Minute 25 issued - Response to applicant's memorandum on Treaty and Cultural expert conferencing
	Minute 26 issued - Further information request regarding Treaty Principles, Existing Interests and Treaty Settlement Obligations.
26 November 2025	Legal issues hearing held in Auckland
27 November 2025	Minute 27 issued - Acceptance of Dr Ganesh Nana's supplementary response to the economic conferencing.
	Minute 28 issued - Acceptance of additional information provided by parties.
2 December 2025	Minute 29 issued - Withdrawal of further evidence from the SANOFEX Group.
8 December 2025	Minute 30 issued - Further information request from the applicant
8 December 2025	Minute 31 issued - Appointment of two technical advisors
9 December 2025	Minute 32 issued - Further information request from Iwi and Hapū Participants.
12 December 2025	

22 December 2025	Minute 33 issued - Acceptance of late response to Minute 32 by Te Kaahui o Rauru Trust
23 December 2025	Minute 34 issued - Further information request regarding the supplementary evidence on fate of tailings backfill
9 January 2026	Minute 35 issued - Dr MacDiarmid's supplementary evidence
4 February 2026	Draft decision issued in accordance with s 81 and 69 FTAA Minute 36 issued – invitation in accordance with s 69(2) FTAA for TTRL to: <ul style="list-style-type: none"> - propose conditions on, or modifications to, any of the approvals sought; or - withdraw the part of the substantive application that seeks any of the approvals sought. Invitation to the Minister for Māori Crown Relations: Te Arawhiti, and the Minister for Māori Development under s 72(2) to provide comment on the draft decision.
4 February 2026	Minute 37 issued – disregarding information filed on behalf of Kiwis Against Seabed Mining Inc. and Greenpeace Aotearoa Inc. in response to the Applicant's response to Minute 30, dated 10 December 2025.

APPENDIX D: Summary of section 53 comments received

Organisation/Person	Comments
Councils	
Horizons Regional Council Horizons Regional Council comments (PDF, 4 MB) Horizons Regional Council appendix One - Technical Assessment (PDF, 1 MB)	<p>Two documents</p> <p>Horizons Regional Council commissioned a technical assessment from Pattle Delamore Partners Ltd to evaluate the environmental effects of the proposed mining activity on the Horizons Coastal Marine Area (CMA).</p> <p>Key concerns include:</p> <ul style="list-style-type: none"> • Sediment plume modelling lacks resolution and may breach water quality targets in the One Plan, particularly regarding euphotic zone and visual clarity. • Uncertainty around impacts on uncharted reef habitats and primary production due to lack of updated assessments. • Insufficient data on sediment deposition area and species responses to long-term sediment exposure. • Lack of adequate information on seabird and marine mammal populations, including threatened species, limits ability to assess impacts. • Continuous mining operations may affect filter-feeding species and benthic habitats not previously assessed. <p>The report recommends the panel consider these information gaps when evaluating the scale and significance of potential effects.</p>
Horowhenua District Council	1 document.

https://www.fasttrack.govt.nz/_data/assets/pdf_file/0016/13255/Horowhenua-District-Council-comments.pdf	<p>Horowhenua District Council expresses concern about potential impacts of sediment plumes on the Horowhenua coastline, coastal environment, and species.</p> <p>Notes the area's ecological and cultural significance, including unique dune formations and endangered fish species.</p> <p>Supports the Taranaki Regional Council's view that the "worst case scenario" should be adopted in assessing plume impacts.</p> <p>Requests careful consideration of technical information submitted by all parties and welcomes ongoing involvement in the process.</p> <p>States that if impacts on Horowhenua do occur, the applicant should be required to mitigate them.</p>
<p>NPDC (New Plymouth District Council)</p> <p>https://www.fasttrack.govt.nz/_data/assets/pdf_file/0017/13256/New-Plymouth-District-Council-comments.pdf</p>	<p>1 document.</p> <p>NPDC opposes the Taranaki VTM Project in its current form.</p> <p>Key concerns include:</p> <ul style="list-style-type: none"> • Environmental uncertainty: The application lacks updated studies on sediment plume modelling, marine mammals, seabirds, and reef ecosystems. NPDC supports TRC's call for a precautionary approach. • Economic concerns: Questions the reliability of projected regional benefits, noting that many jobs may not be local and royalties may not benefit the region. Offshore wind development, a key part of Taranaki's economic strategy, is at risk due to seabed mining. • Cultural impacts: Notes strong opposition from all eight Taranaki iwi and highlights inadequate consultation. Urges the panel to give weight to tikanga Māori and kaitiakitanga. • Social licence and community wellbeing: Expresses concern about the applicant's lack of enduring relationships with stakeholders and the potential negative impact on tourism and community sentiment.

	NPDC concludes that the adverse effects are out of proportion to the project's benefits and recommends the application be declined. If approved, NPDC requests involvement in shaping robust consent conditions.
Rangitikei District Council https://www.fasttrack.govt.nz/data/assets/pdf_file/0018/13257/Rangitikei-District-Council-comments.pdf	<p>1 document.</p> <p>Rangitikei District Council expresses concern about the balance between the economic benefits and environmental, social, and cultural costs of the Taranaki VTM Project.</p> <p>Supports Taranaki Regional Council's view that the application lacks sufficient detail to assess impacts on seabirds, marine mammals, and sediment plume effects on reef ecosystems.</p> <p>Raises specific concerns about potential downstream sediment transport and its impact on Rangitikei's protected coastal areas, including the Rangitikei Foredunes and communities such as Koitiata, Scotts Ferry, and Rātana.</p> <p>Notes the cultural significance of the coastline and supports iwi opposition to the project, acknowledging unity between Rangitikei and Taranaki iwi.</p> <p>Urges the Expert Panel to apply a precautionary and evidence-based approach in evaluating net benefits.</p>
South Taranaki District Council https://www.fasttrack.govt.nz/data/assets/pdf_file/0019/13258/South-Taranaki-District-comments.pdf	<p>1 document.</p> <p>Opposes the project.</p> <p>Concerns include lack of robust environmental assessment, insufficient economic benefits for South Taranaki, and strong community opposition.</p> <p>Highlights gaps in information, particularly regarding marine mammals, sediment plume effects, and recreation/tourism impacts.</p> <p>Requests redistribution of economic benefits to affected communities, including increased community funding, local employment and training, scholarships, and establishment of a physical information centre in Pātea.</p> <p>Supports locating the project's head office and helipad in South Taranaki.</p>

	Notes incompatibility with future offshore wind energy development and urges engagement with the renewable energy sector.
Taranaki Regional Council Taranaki Regional Council comment (PDF, 4 MB) Taranaki Regional Council attachment 1 – economic review (PDF, 306 KB) Taranaki Regional Council attachment 2 – technical assessment (PDF, 1 MB)	<p>3 documents with 3 appendices.</p> <p>Neutral stance; outlines concerns and recommendations.</p> <p>Notes significant gross economic benefits but cannot yet assess net benefits due to environmental uncertainties.</p> <p>Highlights unresolved information gaps from the 2016 Supreme Court decision, especially regarding sediment plume, seabirds, and marine mammals.</p> <p>Raises concerns about sulphur dioxide emissions, sediment toxicity guidelines, oil spill response, and post-extraction liability.</p> <p>Recommends precautionary approach, worst-case scenario planning, and stronger consent conditions.</p> <p>Suggests conditions for cultural protocols, monitoring, and local economic benefit (e.g. head office location).</p> <p>Supports collaborative monitoring with EPA and representation on Technical Review Group.</p>
Whanganui District Council Whanganui District Council comments (PDF, 331 KB) Whanganui District Council – financial model assessment (PDF, 3 MB)	<p>2 documents</p> <p>Whanganui District Council opposes the project.</p> <p>Submission includes a financial assessment by Sanofex Limited, which challenges the reliability of the NZIER economic modelling used by the applicant, citing overstated revenue assumptions and unrealistic pricing.</p> <p>Council notes minimal and unclear economic benefit to Whanganui, absence of domestic processing, and significant opportunity cost due to preclusion of offshore wind farming.</p> <p>Supports Taranaki Regional Council's recommendation to apply a precautionary approach and base decisions on worst-case environmental scenarios.</p>

	<p>Highlights ongoing deficiencies in sediment plume modelling, including lack of updated reef impact assessments and uncertainty around sediment dispersal.</p> <p>Strongly supports iwi concerns regarding inadequate consultation and questions the applicant's respect for kaitiakitanga.</p> <p>Criticizes the outdated Corydon Social Impact Assessment and supports submissions from local fishing clubs, emphasizing inaccuracies and omissions regarding Whanganui's recreational fishing and boating activity.</p> <p>Recommends the panel require a substantial bond and trailing liability to address environmental risks, financial insolvency concerns, and ensure accountability.</p> <p>Concludes that the project offers negligible benefits to Whanganui and risks undermining more sustainable and regionally beneficial opportunities such as offshore wind development.</p>
<u>Environmental groups</u>	
<p>Climate Justice Taranaki Incorporated</p> <p>https://www.fasttrack.govt.nz/_data/assets/pdf_file/0007/13201/Climate-Justice-Taranaki-comments.pdf</p>	<p>1 document.</p> <p>Climate Justice Taranaki opposes the project.</p> <p>Submission raises concerns about unquantified risks to threatened species, benthic habitats, and culturally significant fisheries.</p> <p>Highlights lack of best available information, outdated and inconsistent data, and failure to assess cumulative effects.</p> <p>Notes potential breaches of Te Tiriti o Waitangi and international obligations under the Convention on Biological Diversity.</p> <p>Critiques the economic analysis and raises concerns about oil spill risks, vessel incidents, and climate-related impacts including blue carbon loss.</p>

	<p>Warns of ecological harm from sediment plumes, noise, desalination brine, and vanadium extraction processes.</p> <p>Calls for precautionary approach and references Supreme Court decisions and Waitangi Tribunal hearings.</p> <p>Annex includes visual evidence and expert citations on marine biodiversity, seabirds, marine mammals, and ecosystem vulnerability.</p>
<p>Environmental Defence Society Inc</p> <p>https://www.fasttrack.govt.nz/data/assets/pdf_file/0008/13202/Environmental-Defense-Society-comments.pdf</p>	<p>1 document.</p> <p>EDS opposes the project and recommends it be declined under section 85(3) of the Fast-track Approvals Act 2024 due to adverse impacts being out of proportion to the project's benefits.</p> <p>Argues that TTR has failed to provide a proper cost-benefit analysis and that the NZIER Economic Impact Assessment does not adequately assess net benefits.</p> <p>Highlights legal requirements under the FTAA and EEZ Act, including the need to give greatest weight to the FTAA's purpose while still considering environmental bottom lines and precautionary principles.</p> <p>Notes prior Supreme Court findings on information deficits regarding sediment plume, marine mammals, and seabirds.</p> <p>Calls for expert caucusing, targeted hearings, and legal submissions to address novel issues under the FTAA.</p> <p>Requests the Panel commission its own cost-benefit analysis and consider both monetary and non-monetary impacts.</p> <p>Maintains that the project's adverse effects on biodiversity, natural character, and fisheries are significant and inadequately mitigated by proposed conditions.</p>
<p>Royal Forest and Bird Society</p> <p>Forest and Bird comments (PDF, 674 KB)</p>	<p>6 documents.</p> <p>Opposes the project.</p>

<p>Forest and Bird evidence D Clement on marine mammals (PDF, 805 KB)</p> <p>Forest and Bird evidence Glenn Banks oneconomics (PDF, 242 KB)</p> <p>Forest and Bird evidence Natasha Sitarz on planning (PDF, 979 KB)</p> <p>Forest and Bird JASCO peer review on underwater noise and marine mammals (PDF, 1 MB)</p> <p>Forest and Bird Natasha Sitarz Appendix 3-JWS planning (PDF, 274 KB)</p>	<p>Forest & Bird provided a suite of legal and technical evidence opposing the Taranaki VTM seabed mining application. Their legal memorandum outlines statutory and environmental grounds for concern, emphasising high biodiversity values in the South Taranaki Bight.</p> <p>Dr Clement's evidence underscores risks to marine mammals, with JASCO's peer review reinforcing concerns over underwater noise and habitat disturbance.</p> <p>Prof Bank's economic analysis questions the cost-benefit balance of the project, highlighting ecological and social costs not adequately accounted for.</p> <p>Natasha Sitarz's planning evidence critiques the proposal's alignment with regional and national planning frameworks, supported by a Joint Witness Statement.</p> <p>Collectively, Forest & Bird assert that the proposal violates EEZ and FTAA legal tests, poses significant environmental threats, and warrants rejection.</p>
<p>KASM and Greenpeace</p> <p>KASM and Greenpeace comments (PDF, 556 KB)</p> <p>KASM and Greenpeace evidence Chris Fleming and Andrew Buckwell (PDF, 980 KB)</p> <p>KASM and Greenpeace evidence Dougal Greer (PDF, 4 MB)</p> <p>KASM and Greenpeace evidence Dr TJ Anderson Appendix and Figure (PDF, 2 MB)</p>	<p>9 documents</p> <p>KASM and Greenpeace submitted a comprehensive set of comments, and eight supporting expert evidence reports opposing the Taranaki VTM seabed mining proposal. Their core submission argues the application is legally and scientifically deficient, failing to meet EEZ Act requirements for best-available information and precautionary measures, and overstating economic benefits under the Fast Track Approvals Act. Expert evidence covers plume modelling, benthic ecology, seabird and marine mammal impacts, acoustic disturbance, and economic analysis, collectively highlighting significant data gaps, ecological risks, and unmitigated environmental harm. They conclude the proposal does not demonstrate substantial regional or national benefit and recommend the application be declined.</p>

<p>KASM and Greenpeace evidence Dr TJ Anderson (PDF, 288 KB)</p> <p>KASM and Greenpeace evidence Jill Cooper (PDF, 166 KB)</p> <p>KASM and Greenpeace evidence Leigh Torres (PDF, 6 MB)</p> <p>KASM and Greenpeace evidence John Cockrem (PDF, 1 MB)</p> <p>KASM and Greenpeace evidence John Luick (PDF, 165 KB)</p>	
<p>NMMRS (Ngā Motu Marine Reserve Society)</p> <p>Ngā Motu Marine Reserve Society comments</p>	<p>1 document.</p> <p>Opposes the project.</p> <p>Concerns include sediment plume effects on light penetration, primary productivity, and sensitive reef habitats such as Project Reef and other newly mapped subtidal rocky reefs.</p> <p>Highlights the ecological importance of kelp forests, sponge gardens, bryozoan fields, and nursery habitats for juvenile blue cod.</p> <p>Criticises the lack of robust data on seabirds and marine mammals, especially kororā and orca, and presents GPS tracking and citizen science data contradicting the applicant's claims.</p> <p>Notes that the application fails to meet the “best available information” standard required under the Fast-track Approvals Act.</p> <p>Calls for the application to be declined due to significant information gaps and ecological risks.</p>

Fishing and boating clubs	
Aotearoa Clam Holdings Aotearoa Clam Holdings Limited	<p>1 document.</p> <p>Ticked boxes, did not provide comments document outside of the letter.</p> <p>States that ticked boxes are negative effects to:</p> <ul style="list-style-type: none"> • Sedimentation • Coastal processes • Benthic ecology • Fished species • Marine mammals
Brooks Seafood Ltd & Awaroa Fisheries Ltd https://www.fasttrack.govt.nz/_data/assets/pdf_file/0015/13218/Brooks-Seafood-Ltd-comments.pdf	<p>1 document.</p> <p>Ali Brooks opposes the project on behalf of Brooks Seafood Ltd and Awaroa Fisheries Ltd.</p> <p>Submission outlines extensive firsthand knowledge of the South Taranaki Bight fishery, including annual snapper migration patterns and sightings of large dolphin pods and blue whales.</p> <p>Claims the area is ecologically rich and vital to commercial and customary fishing, contradicting assertions that it is barren.</p> <p>Raises concerns about displacement of customary fisheries and taonga species, and potential breaches of Te Tiriti o Waitangi and the Māori Fisheries Act 2004.</p> <p>Notes that the application undermines the Māori Fisheries Settlement and could trigger future Treaty claims.</p> <p>Criticizes the scale and duration of the proposed consent, calling for pilot testing and stronger due diligence.</p>

	<p>Warns of legal action for damages and loss of earnings if the application is approved.</p> <p>Supports the Supreme Court ruling and calls for environmental protection over short-term economic gain.</p>
<p>Cloudy Bay Clams Seafoods</p> <p>https://www.fasttrack.govt.nz/_data/assets/pdf_file/0016/13219/Cloudy-Bay-Clams-Seafoods-comments.pdf</p>	<p>1 document.</p> <p>Ticked boxes, did not provide comments document outside of the letter.</p> <p>States that the following ticked boxes are negative effects:</p> <ul style="list-style-type: none"> • Sedimentation • Coastal processes • Benthic ecology • Fished species • Marine mammals
<p>Hollings Resource Management Ltd</p> <p>https://www.fasttrack.govt.nz/_data/assets/pdf_file/0008/13220/Hollings-Resource-Management-Ltd-comments.pdf</p>	<p>1 document.</p> <p>Submission from Tom Hollings, a quota holder in the relevant area and marine ecologist with extensive experience in fisheries, consenting, and environmental effects assessment.</p> <p>Supports the project in full and recommends approval of all aspects of the application.</p> <p>States that the ecological and other adverse effects are not significant and that the environment is robust enough to handle any potential impacts.</p> <p>Considers the application and supporting documentation to be comprehensive and high quality.</p> <p>Has no personal or financial interest in the project.</p>
<p>Ohawe Boat and Angling Club</p> <p>https://www.fasttrack.govt.nz/_data/assets/pdf_file/0009/13221/Ohawe-Boat-and-Angling-Club-opposes-the-project.pdf</p>	<p>1 document.</p> <p>Ohawe Boat and Angling Club opposes the project.</p>

<p>e-Boat-and-Angling-Club-comments.pdf</p>	<p>Submission describes decades of recreational fishing and diving in the South Taranaki Bight, including detailed observations of marine biodiversity and habitat structures at the uncharted “4 Mile Reef.”</p> <p>Notes frequent sightings and interactions with marine mammals, seabirds, and diverse fish species, including juvenile populations and breeding crayfish.</p> <p>Highlights the reef’s low tidal movement and clean water conditions, which make it uniquely vulnerable to sedimentation.</p> <p>Challenges TTR’s assumptions about sediment effects, stating that additional sediment will smother and suffocate reef life beyond natural background levels.</p> <p>Emphasizes the ecological significance of the reef and its importance to the local community.</p>
<p>Opunake Boat and Underwater Club</p> <p>https://www.fasttrack.govt.nz/_data/assets/pdf_file/0010/13222/Opunake-Boat-and-Underwater-Club-comments.pdf</p>	<p>1 document.</p> <p>Opposes the project.</p> <p>Raises concerns about lack of evidence on sediment plume size and ecological damage.</p> <p>Notes the area is a known migration route for humpback whales and habitat for Maui dolphins.</p> <p>Disputes claims of barren seafloor, citing firsthand knowledge of benthic ecosystems supporting fish species.</p> <p>Warns that mining will destroy these ecosystems for years or decades.</p> <p>Calls for protection of fragile marine species and ecosystems.</p>
<p>Sealord</p> <p>https://www.fasttrack.govt.nz/_data/assets/pdf_file/0011/13223/Sealord-comments.pdf</p>	<p>1 document.</p> <p>Sealord opposes the Taranaki VTM project.</p> <p>Their submission highlights concerns about potential impacts on pelagic fisheries in the South Taranaki Bight, particularly jack mackerel, blue mackerel, and barracouta.</p>

	<p>Although Sealord's vessels are excluded from the mining area due to size restrictions, they operate near the 20nm boundary where sediment plume modelling suggests possible effects.</p> <p>They note that while direct physical impacts may be limited, broader ecosystem effects—such as heavy metal resuspension and changes to light transmission—could affect fisheries.</p> <p>Sealord emphasizes the unpredictability of ocean currents and climate variability (e.g. ENSO), which could amplify impacts and supports a precautionary approach.</p> <p>They endorse submissions made by Seafood NZ and Te Ohu Kaimoana.</p>
<p>South Taranaki Underwater Club</p> <p>https://www.fasttrack.govt.nz/_data/assets/pdf_file/0020/13259/South-Taranaki-Underwater-Club-comments.pdf</p>	<p>One document.</p> <p>Opposes the project.</p> <p>Submission highlights extensive local ecological knowledge and scientific collaboration through “Project Reef,” including reef mapping, sponge taxonomy, and underwater camera deployments.</p> <p>Concerns include sediment plume modelling inadequacies, lack of reef-specific conditions, and omission of key reports and data in the application.</p> <p>Criticises outdated environmental assessments and lack of recognition of sensitive habitats and biodiversity in the Pātea Shoals.</p> <p>Calls for inclusion of reef monitoring conditions, use of best international practice, and recognition of community-led research.</p> <p>Requests participation in future hearings and condition-setting processes.</p>
<p>Submitter 1</p> <p>https://www.fasttrack.govt.nz/_data/assets/pdf_file/0012/13224/Submitter-1-comments.pdf</p>	<p>1 document.</p> <p>Opposes the project.</p> <p>Commercial fisherman with over 35 years' experience.</p>

	<p>Argues that the TTR application understates the richness of commercial fish species in the area and relies on outdated and misapplied data.</p> <p>Highlights the ecological and economic importance of the “Rolling Ground” and surrounding habitats, including spawning grounds and juvenile development areas.</p> <p>Warns of sediment dispersal risks to reef systems and juvenile crayfish.</p> <p>Notes the increasing reliance on the South Taranaki Bight due to other area closures.</p> <p>Raises concerns about erosion of quota value and long-term impacts on the fishing industry.</p> <p>Calls the application inaccurate and lacking in adequate research, and warns of dangerous precedent.</p>
<p>Talleys Group</p> <p>https://www.fasttrack.govt.nz/data/assets/pdf_file/0013/13225/Talleys-Group-Ltd-comments.pdf</p>	<p>1 document.</p> <p>Lack of information about commercial fisheries.</p> <p>Poor evidence gathering regarding cetacean vocalizations. The data TTR use to determine acoustic effect on mammals is dated. 2017 expert conferencing agreed that acoustic monitoring was needed – that data has not been collected.</p> <p>Inadequate benthic surveys – does not include organisms smaller than 4mm, which are critical to the marine food web. Therefore, full environmental impact is not assessed.</p> <p>Concerned that applicant’s sediment plume model is not “worst-case scenario” and does not adequately consider sediment size.</p> <p>Document is 99 pages and consist of comments from Talley’s, and expert evidence from the following:</p> <ul style="list-style-type: none"> • Dr Greg Barbara (marine environmental impact) • Dr Joris Jorissen (suspended sediment modeling) • Dr Jeremy Helson (fishing industry – ex Chief Executive of Seafood New Zealand)

	<ul style="list-style-type: none"> • Captain Andrew Smith (fishing industry)
Whanganui Manawatu Sea Fishing Club and Patea and Districts Boating Club https://www.fasttrack.govt.nz/_data/assets/pdf_file/0014/13226/Whanganui-Manawatu-Sea-Fishing-Club,-and-Patea-and-Districts-Boating-Club-comments.pdf	<p>Joint submission from two clubs, with additional comments from Coastguard Whanganui, Waitōtara Pātea Fishing Club, and Progress Castlecliff.</p> <p>Opposes the project due to risks to ecological integrity, recreational access, and community wellbeing.</p> <p>Concerns include sediment plume effects, exclusion zones, noise, and degradation of reef habitats.</p> <p>Highlights extensive local knowledge and high recreational use of the South Taranaki Bight, including detailed mapping of fishing and diving grounds.</p> <p>Criticises lack of consultation and exclusion from monitoring frameworks.</p> <p>Requests inclusion of recreational users in environmental monitoring and decision-making.</p> <p>Calls for protection of recreational values and recognition of community-led stewardship efforts.</p>
Seafood NZ https://www.fasttrack.govt.nz/_data/assets/pdf_file/0015/13731/Seafood-New-Zealand-Comments-on-TTR-application.pdf	<p>Two documents</p> <p>Opposes the project unless conditions are imposed to mitigate adverse effects and reduce uncertainty.</p> <p>Concerns include insufficient assessment of impacts on commercial fishing, fish habitats, and fisheries economics.</p> <p>Highlights overlap of mining site with set net and inshore trawl fisheries, and potential off-site effects on other fisheries including jack mackerel, rock lobster, and surf clams.</p> <p>Notes cumulative spatial displacement, risks to quota value, and lack of baseline data.</p> <p>Recommends new conditions including fish and shellfish impact mitigation, fish monitoring plan, commercial fishing engagement, hazard notifications, and protection of habitats of particular significance for fisheries management.</p> <p>Emphasises the need for conditions consistent with the Fisheries Act and EEZ Act.</p>

<p>NZ Rock Lobster Industry Council Ltd</p> <p>NZ Rock Lobster Industry Council comments</p>	<p>1 document.</p> <p>NZ RLIC supports Seafood New Zealand's opposition to the application unless conditions are imposed to address uncertainty and adverse effects.</p> <p>Submission highlights insufficient information on impacts to commercial fishing, particularly localised effects on fish distribution, productivity, and abundance.</p> <p>Notes potential displacement of fishing effort, increased costs, reduced profitability, and cumulative spatial exclusions already affecting the area.</p> <p>Concerns raised about sediment plume modelling, hazards from post-mining seabed features, and risks to seafood quality and safety.</p> <p>Recommends conditions including fish and shellfish impact mitigation, pre-commencement and ongoing monitoring, inclusion of NZ RLIC in engagement processes, protection of habitats of particular significance for fisheries management (HPSFM), and consideration of a bond to ensure recovery.</p> <p>Supports inclusion of HPSFM sites in benthic monitoring and fish monitoring plans.</p>
<p><u>Iwi</u></p>	
<p>Araukuuku hapu</p> <p>https://www.fasttrack.govt.nz/_data/assets/pdf_file/0015/13227/Araukuuku-comments.pdf</p>	<p>1 document.</p> <p>Concerns focus on the lack of consultation, despite the Hapu's recognised mana moana status, and the inadequacy of the environmental assessments provided. They were not consulted by the applicant.</p> <p>Environmental assessments that <i>are</i> provided are dated.</p> <p>Worried about the effects of noise, sediment drift, and emissions on taonga species and their migration patterns.</p> <p>Concerned that the applicant has not mentioned additional carbon dioxide and other emissions which mining, transport, and processing activates will cause.</p>

	Araukuuku opposes the project.
Kanihi umutahi me ētehi atu hapū Kanihi umutahi me ētehi atu hapū	<p>1 document</p> <p>Kanihi Umutahi me ētehi atu hapū, a hapū of Ngāruahine, submitted comments opposing the Taranaki VTM seabed mining proposal under the FTAA.</p> <p>They assert a deep, enduring relationship with the moana, grounded in whakapapa, tikanga, and kaitiakitanga, and note their application for customary marine title under MACA.</p> <p>The hapū were not consulted and highlight the absence of cultural impact assessment in the application.</p> <p>Key concerns include sediment plumes affecting taonga species, underwater noise impacting marine mammals, cumulative ecological effects, and long-term contamination risks. They also raise climate change implications from greenhouse gas emissions.</p> <p>The submission calls for recognition of their mana moana and genuine engagement before any decision is made.</p>
Nga Rauru Te Kaahui o Rauru Trust Cover Sheet Ngā rauru Kiitahi Appendix A Ngā rauru Kiitahi Appendix B - English memo Te Kaahui o Rauru statement of Renee Bradley and Tahinganui Hina Te Kaahui o Rauru statement of Te Huia Bill Hamilton	<p>7 documents.</p> <p>Te Kaahui o Rauru Trust opposes the project.</p> <p>Submission includes legal, customary, and expert economic evidence.</p> <p>Concerns raised about breach of Treaty settlement obligations, inadequate engagement, and failure to incorporate Ngāa Raurutanga.</p> <p>Highlights significant environmental risks including sediment plume, destruction of seabed habitats, and impacts on taonga species.</p> <p>Customary evidence emphasizes sacred relationship with the moana and warns of transgression against tikanga and kawa.</p>

Te Kaahui o Rauru statement of Turama Hawira	<p>Economic analysis by Dr Ganesh Nana critiques the applicant's modelling and calls for a Total Economic Value approach.</p>
Legal submissions of counsel for Te Kaahui o Rauru	<p>Trust outlines sustainable, intergenerational development pathways including fisheries, climate resilience, and renewable energy.</p>
Te Kaahui o Rauru Trust statement of Dr Ganesh Nana on economics	<p>Cites Supreme Court findings affirming the need to consider tikanga and existing interests.</p> <p>Calls for the application to be declined under sections 7, 81, 83, and 85 of the FTAA.</p>
<p>Ngā Tāngata Tiaki o Whanganui</p> <p>Ngā Tāngata Tiaki o Whanganui comments</p>	<p>1 document</p> <p>Identified effects on:</p> <ul style="list-style-type: none"> • Sedimentation and optical water quality • Fished species • Existing interests • Mouri, customary and commercial fishery interests <p>Object in totality to the Fast Track substantive application due to:</p> <ul style="list-style-type: none"> • Affects the mouri of Tangaroa and the kawa central to their tangata tiaki role • Impact on customary and commercial fishing stocks • Implications on the rights and commercial interests for which Te Whiringa Muka hold and are guaranteed under the Tiriti o Waitangi • Lack of enduring relationships between TTR and Te Atihaunui a Paparangi or the relevant hapū • Environmental impacts have not been resolved.
<p>Ngāti Hāua Hapū</p>	<p>1 document</p>

<p><u>Ngāti Hāua Hapū comments</u></p>	<p>Identified effects on:</p> <ul style="list-style-type: none"> • Economics • Coastal processes • Fished species • Marine mammals • Sedimentation and optical water quality • Benthic ecology and primary productivity effects • Existing interests • Mana whenua <p>Strongly opposes the application</p> <p>Their submission emphasizes a deep cultural and spiritual connection to the moana, reliance on reefs (māra) for sustenance, and obligations as kaitiaki. They highlight lack of consultation, absence of cultural impact assessment, and outdated environmental modelling.</p> <p>Key concerns include sediment plumes, chemical discharges, impacts on taonga species (including marine mammals), cumulative ecological effects, and climate change implications.</p> <p>They argue economic benefits are overstated and unlikely to reach local communities, contrasting with past extractive industry experience.</p> <p>Legal submissions stress environmental bottom lines under the EEZ Act, NZ Coastal Policy Statement, and Treaty principles, noting Supreme Court findings of deficiencies remain unresolved.</p> <p>Ngāti Hāua urges the Panel to decline the application; if granted, they seek robust conditions including a NZ\$10 million bond for decommissioning and environmental clean-up.</p>
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<p>Ngāti Manuhiakai</p> <p>Ngāti Manuhiakai comments</p>	<p>1 document</p> <p>Opposes the application</p> <p>Emphasizes a deep ancestral and spiritual connection to the moana, awa, and surrounding environment, viewing these as inseparable from their identity and wellbeing.</p> <p>They highlight cultural values tied to kaitiakitanga, health, and the protection of taonga species, including marine mammals, fish, and benthic organisms. The hapū stresses that any degradation of mauri threatens their cultural, spiritual, and physical health, and they express strong concern about impacts on biodiversity and customary practices.</p>
<p>Ngāti Tū hapu and others</p> <p>https://www.fasttrack.govt.nz/_data/assets/pdf_file/0013/13234/22690e30fbb430a7292ffd9ab514c49dde6ec7.pdf</p>	<p>1 document.</p> <p>Comments made on behalf of Ngāti Tū, Ngāti Manuhiakai, Kānihi-Umutah, Ōkahu-Inuāwai, and Te Patutokotoko</p> <p>Applicant has not provided adequate environmental monitoring or updated sediment modelling, making it hard to assess impacts reliably.</p> <p>Concerned that the applicant still wishes to undertake significant pre-commencement monitoring prior to commencing its activities – despite having now had so many years to undertake that monitoring.</p> <p>Insufficiency of information and/ or adverse impacts being out of proportion to the project's regional or national benefits.</p> <p>Ngāti Tu hapu and others also make comments which relate to previous Supreme Court decision, not necessarily this application.</p>
<p>Ngāti Tū hapu</p> <p>https://www.fasttrack.govt.nz/_data/assets/pdf_file/0014/13235/06774e5cd81b30619e6692016763d4984a21c0c5.pdf</p>	<p>1 document.</p> <p>Opposes the project.</p> <p>Ngāti Tū were not consulted by the applicant.</p>

	<p>Concerned about sediment plumes and noise affecting taonga species, especially the Blue Whale population.</p> <p>Concerned about the unknown impacts on migratory species like tuna and piharau, which are vital to their cultural and ecological practices.</p> <p>The applicant's environmental reports are outdated. No life cycle analysis or assessment of CO₂ emissions and climate change impacts.</p> <p>Ngāti Tū believes the project's economic and environmental benefits are poorly understood.</p> <p>The applicant's parent company's financial instability raises concerns about long-term accountability.</p>
<p>Ōkahu-Inuāwai</p> <p>Ōkahu-Inuāwai comments</p> <p>Ōkahu-Inuāwai me ētehi atu hapū comments</p>	<p>1 document</p> <p>Strongly oppose the application.</p> <p>Their submission emphasizes deep ancestral and spiritual connections to the moana, awa, and whenua, and highlights tikanga principles such as kaitiakitanga, manaakitanga, and rangatiratanga.</p> <p>They express serious concerns about sediment plumes, biohazards, and impacts on taonga species, noting the project is incompatible with their Taiao Plan and Climate Strategy.</p> <p>The hapū condemns the lack of engagement and consultation, asserting breaches of legal and tikanga obligations.</p> <p>They argue the proposal offers no regional or national benefits, citing economic risks and TTR's financial instability, and warn of irreversible cultural and ecological harm that threatens intergenerational knowledge and kaitiakitanga.</p> <p>They urge the Panel to reject the application outright.</p>
<p>Te Kāhui Maru Trust</p> <p>Te Kahui Maru Trust comments</p>	<p>1 document</p> <p>Strongly opposes the application.</p>

	<p>Cites major environmental, cultural, and legal concerns.</p> <p>Argue the project poses significant risks to marine ecosystems, taonga species, and customary and commercial fishing rights, while undermining Treaty of Waitangi obligations and tikanga Māori.</p> <p>The submission highlights previous court rulings rejecting similar applications due to inadequate environmental assessment and Treaty compliance, and condemns the fast-track process as a breach of constitutional and environmental protections.</p> <p>Key concerns include sediment plumes, habitat destruction, and impacts on food security, cultural practices, and iwi fisheries settlement assets.</p> <p>The Trust also notes incompatibility with offshore wind energy development, which offers far greater long-term benefits.</p> <p>They conclude that the costs far outweigh limited and mostly offshore gains, urging the Panel to decline the application in full.</p>
<p>Te Kāhui o Taranaki</p> <p>Te Kāhui o Taranaki comments</p>	<p>1 document.</p> <p>The iwi's environmental plan opposes seabed mining.</p> <p>Selected effects on:</p> <ul style="list-style-type: none"> • Economic • Coastal Processes • Sedimentation and Optical Water Quality • Benthic Ecology and Primary Productivity • Marine Mammals • Existing Interests

	<ul style="list-style-type: none"> Climate Change <p>Concerned that Treaty rights are being undermined by the Fast-track Approvals Act 2024, which bypasses proper consultation and contradicts commitments made in the Taranaki Iwi Claims Settlement Act 2016.</p> <p>Marine mammal data is outdated and ignores recent findings, including the presence of a unique Blue Whale population in South Taranaki Bight.</p> <p>NIWA research showing potential long-term damage to marine habitats and species from sediment discharges.</p> <p>Overstates economic benefits and fails to account for the fact that vanadium is not subject to NZ royalties, meaning profits will largely benefit an overseas company.</p> <p>Notes the iwi's role in managing customary fisheries and the recent section 186A closure supporting a rāhui.</p> <p>Criticises the Fast-track Approvals Act as undermining Treaty rights and previous court decisions.</p> <p>Requests updated plume modelling, marine mammal data, carbon release estimates, and economic analysis including effects on other industries.</p>
TKONT (Te Korowai o Ngāruahine Trust) Te Korowai o Ngāruahine Trust comments	<p>1 document.</p> <p>Te Korowai o Ngāruahine Trust opposes the project.</p> <p>Submission highlights procedural breaches under the Fast-track Approvals Act 2024, including failure to consult with iwi and hapū, and lack of appropriate information formatting.</p> <p>Concerns raised about outdated environmental data, insufficient sediment plume modelling, and lack of updated marine mammal and seabird surveys.</p> <p>Economic analysis is considered narrow and excludes Māori economy values such as mahinga kai and informal/shared economies.</p> <p>Submission asserts that the project breaches Treaty settlement obligations and MACA rights, and fails legal tests under the FTAA, RMA, and EEZ Act.</p>

	<p>Cultural impacts include harm to tikanga, mauri, and wāhi tapu, with specific references to reef systems, taonga species, and ritual practices.</p> <p>Concerns about biosecurity risks from ballast water and lack of Crown royalties for vanadium extraction.</p> <p>Calls for hearings and appointment of pūkenga, and requests a bond and insurance due to financial instability of the applicant's parent company.</p> <p>Submission includes extensive legal references and cites Supreme Court findings supporting the need for caution and recognition of tikanga.</p>
<p>Te Ohu Kaimoana</p> <p>Te-Ohu-Kaimoana-comments.pdf</p>	<p>1 document.</p> <p>Te Ohu Kaimoana opposes the project.</p> <p>Stated effects on:</p> <ul style="list-style-type: none"> • Economics • Sedimentation and Optical Water Quality • Fished species • Existing interests • Treaty settlement rights and interests <p>Submission outlines that the project is inconsistent with the Māori Fisheries Settlement and breaches section 7 of the Fast-track Approvals Act 2024.</p> <p>Concerns include lack of engagement with Tangata Kaitiaki, insufficient data on customary non-commercial fishing, and risks to taonga species such as tuna and piharau.</p> <p>Highlights potential adverse effects on pātaka systems and the inability of iwi to divest quota due to Māori Fisheries Amendment Act 2024, meaning any loss in value is disproportionately borne by iwi.</p>

	<p>Commercial fishing operations by Moana New Zealand overlap spatially with the project area, risking displacement and reduced catch.</p> <p>Also raises concerns about Māori aquaculture interests in Admiralty Bay and insufficient consultation with affected iwi.</p> <p>Submission includes detailed background on the Māori Fisheries Settlement, quota allocation models, and iwi interests in affected fish stocks.</p>
<p>Te Runanga o Ngati mutunga</p> <p>Te Rūnanga o Ngāti Mutunga comments</p>	<p>1 document.</p> <p>Stated effects on:</p> <ul style="list-style-type: none"> • Economics • Coastal processes • Benthic ecology and primary productivity • Marine mammals • Climate change <p>There is insufficient information on economic and environmental impact, especially sediment discharges.</p> <p>Insufficient data on marine mammals, particularly blue whales.</p> <p>Te Runanga o ngati mutunga want a precautionary approach taken to any decision.</p> <p>FTAA undermines rights of Ngāti Mutunga and bypasses established resource management systems.</p>
<p>Te Runanga o Ngati Ruanui</p> <p>Te Rūnanga o Ngāti Ruanui comments</p>	<p>4 documents.</p> <p>Te Runanga o Ngati Ruanui Comments</p>

<p>Te Rūnanga o Ngāti Ruanui Affidavit of H Maruera</p> <p>Te Rūnanga o Ngāti Ruanui Affidavit of G Young</p> <p>Te Rūnanga o Ngāti Ruanui “HCMM-1” Ngati Ruanui Customary Interests and Marine and Coastal Usage</p>	<p>Affidavit of Haimona Christopher Marcus Maruera.</p> <p>Affidavit of Grant Young.</p> <p>Submissions of Counsel for Te Kaahui o Rauru Trust.</p> <p>Opposes the project.</p> <p>Raises concerns about outdated environmental data, lack of robust cost-benefit analysis, and risks to taonga species and customary fisheries.</p> <p>Highlights the importance of the South Taranaki Bight for Blue Whales and the potential climate change impacts from sediment disturbance.</p> <p>Notes the iwi’s role in managing customary fisheries and the recent section 186A closure supporting a rāhui.</p> <p>Criticises the Fast-track Approvals Act as undermining Treaty rights and previous court decisions.</p> <p>Requests updated plume modelling, marine mammal data, carbon release estimates, and economic analysis including effects on other industries.</p> <p>Calls for adherence to iwi environmental plan Taiao, Taiora and the precautionary approach in the NZ Coastal Policy Statement.</p> <p>Te Kaahui o Rauru submissions detail extensive cultural, legal, and environmental concerns, including:</p> <ul style="list-style-type: none"> • Lack of genuine engagement by the applicant. • Risks to the exercise of Ngaa Raurutanga and kaitiakitanga. • Inadequate and outdated environmental information. • Economic modelling errors and misleading claims about export value. • Disproportionate adverse effects relative to claimed benefits. • Breach of Treaty settlements and MACA rights.
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	<ul style="list-style-type: none"> • Emphasis on Total Economic Value and intergenerational sustainability. <p>Strongly recommends the Panel decline the application under sections 85(1) and (3) of the FTAA.</p>
Te Tōpuni Kōkōrangī Te Tōpuni Kōkōrangī comments	<p>1 document</p> <p>This submission provides context of Te Kāhui Tupua Act 2025, which recognises Taranaki Maunga and related peaks as a living, indivisible whole and a legal person, reflecting cultural and spiritual significance, and outlines the role of Te Tōpuni Kōkōrangī as the voice and representative of Te Kāhui Tupua, with equal Crown and iwi representation.</p> <p>Concerns about the application include:</p> <ul style="list-style-type: none"> • Iron sands originate from and are connected to Te Kāhui Tupua. • The application does not reference the Te Kāhui Tupua Act or Treaty settlement obligations, creating an information gap. • Removing iron sands at the proposed scale is inconsistent with the Act and Te Ruruku Pūtakerongo principles. <p>Recommends hold a hearing for detailed input.</p> <p>Support Ngā Iwi o Taranaki's position opposing the project.</p>
Te Tōpuni Ngārahu Trusts Te Tōpuni Ngārahu Trusts comments	<p>1 document</p> <p>Te Tōpuni Ngārahu Trust is the collective governance entity for Ngā Iwi o Taranaki, established under the Te Kāhui Tupua Act 2025, representing iwi interests and their relationship with Taranaki Maunga.</p> <p>Strongly oppose the Taranaki VTM seabed mining project, supporting Aotea Waka iwi (Ngāti Ruanui, Ngaa Rauru, Ngāruahine) in their long-standing opposition.</p> <p>Reasons for opposition:</p>

	<ul style="list-style-type: none"> Minerals targeted for extraction originate from Te Kāhui Tupua, which is legally recognized as a living entity under the Te Kāhui Tupua Act. The project disregards Treaty settlement principles and iwi rights. Significant risks to marine ecosystems, benthic habitats, and primary productivity due to sediment discharge; potential harm to marine mammals (including a unique Blue Whale population); and disruption of fisheries recovery efforts. Climate change impacts: Insufficient data Economic analysis flaws FTAA bypasses natural justice and Treaty principles, enabling extractive projects previously rejected by courts. <p>The Expert Panel should decline the application. If a hearing is held, Te Tōpuni Ngārahu wishes to be heard.</p>
Ministers of the Crown	
Associate Minister of Transport (Hon James Meager) Associate Minister of Transport	<p>1 document.</p> <p>Supports the Taranaki VTM Project and its alignment with the Government's economic development priorities.</p> <p>Notes that the Maritime and Navigational Impacts report included in the application is dated 2015 and recommends the panel request a review to ensure its conclusions remain current.</p> <p>Submission does not identify specific transport-related concerns but encourages updated assessment of navigational impacts.</p>
Minister for Biosecurity (Hon Andrew Hoggard)	<p>1 document.</p> <p>Submission states no immediate biosecurity issues have been identified for the project.</p>

Minister for Biosecurity	<p>Notes that all overseas marine vessels entering New Zealand's EEZ must comply with biofouling regulations and provide evidence prior to arrival.</p> <p>Standard arrival procedures will apply, and projected vessel numbers are unlikely to impact Biosecurity New Zealand's operational capacity.</p> <p>Non-compliance will be managed on a case-by-case basis and is not expected to strain resources.</p> <p>Once vessels are cleared, movements between the site and ports are considered domestic and do not trigger further biosecurity requirements.</p>
<p>Minister for Economic Growth</p> Minister for Economic Growth	<p>1 document.</p> <p>Letter of support from the Minister for Economic Growth.</p> <p>Submission focuses on the economic benefits of the Taranaki VTM Project under section 22(2)(a)(iv) of the Fast-track Approvals Act 2024.</p> <p>Cites NZIER modelling which estimates the project will contribute \$62 million to GDP and create 459 jobs during setup, and \$265 million annually to GDP with 1,365 jobs during its 20-year operational phase.</p> <p>Notes projected annual export revenues of \$854 million.</p> <p>States the project aligns with Government goals to double exports by 2040 and supports the Minerals Strategy under the Going for Growth programme.</p>
<p>Minister for Māori Development and Māori Crown Relations (Hon Tama Potaka)</p> Minister for Māori Development and Māori Crown Relations	<p>1 document.</p> <p>Submission is neutral on whether the application should be approved.</p> <p>Recommends the Expert Panel consider comments from Treaty Settlement groups identified in the Ministry for the Environment's section 18 report and the Panel's Appendix 1.</p> <p>Highlights the importance of assessing impacts on customary food-gathering practices under the Fisheries (Kaimoana Customary Fishing) Regulations 1998.</p>

	<p>Requests consideration of quota allocation and management under the Māori Fisheries Act 2004.</p> <p>Emphasizes statutory acknowledgements in the following Treaty Settlements: Ngāti Ruanui (2003), Ngaa Rauru (2005), Ngāti Apa (2010), Ngāruahine (2016), and Taranaki Iwi (2016).</p>
<p>Minister for Resources and Regional Development (Hon Shane Jones)</p> <p>Minister-for-Resources-and-Minister-for-Regional-Development.pdf</p>	<p>1 document.</p> <p>Submission outlines support for the project's alignment with the Government's Minerals Strategy to 2040, which aims to double minerals exports to \$3 billion by 2030.</p> <p>Notes that vanadium and titanium are listed as critical minerals and the project could support resilient supply chains and export growth.</p> <p>Emphasizes that minerals development must honour Te Tiriti o Waitangi, uphold Treaty settlements, and be environmentally responsible.</p> <p>Acknowledges potential regional economic benefits including increased GDP and job creation.</p> <p>Recognizes that opportunity costs and wider impacts (e.g. on fisheries and offshore wind energy) require examination but should not be considered fatal barriers.</p>
<p>Minister for Infrastructure (Hon Chris Bishop)</p> <p>Minister of Infrastructure</p>	<p>1 document.</p> <p>Letter of support from the Minister for Infrastructure.</p> <p>Expresses broad support for projects that deliver positive outcomes for New Zealand, including the Taranaki VTM project.</p> <p>States that the Government views infrastructure as essential for growth and prosperity, and that the planning system has not adequately enabled growth — hence the establishment of the Fast-track Approvals Act 2024.</p> <p>Submission reflects the Government's economic growth and infrastructure priorities.</p>

<p>Minister for Oceans and Fisheries (Hon Shane Jones)</p> <p>Minister for Oceans and Fisheries</p>	<p>1 document.</p> <p>Submission outlines concerns about impacts on commercial, customary, and recreational fishing.</p> <p>Notes that set-netting and trawling are predominant in the mining and sediment plume areas, with some fishers highly dependent on this area.</p> <p>Highlights that the applicant's assessment may underestimate localised impacts and economic implications for fishers.</p> <p>Customary fishing rights may be significantly affected due to sediment plume impacts on rohe moana and sensitive species.</p> <p>Recommends engagement with tangata whenua and fishers to develop monitoring and mitigation measures.</p> <p>Identifies nursery habitat for blue cod at Pātea Shoals as potentially impacted, with insufficient assessment of sedimentation effects.</p> <p>Calls for pre-commencement surveying and ongoing monitoring to verify no material harm to fish habitat and fisheries.</p> <p>Supports inclusion of representative fisheries organisations and iwi in monitoring plan design.</p>
<p><u>Other</u></p>	
<p>Environmental Protection Authority</p> <p>Environmental Protection Authority comments</p>	<p>1 document.</p> <p>The EPA declines to comment on the application at this stage.</p> <p>Notes that the EPA will be invited to comment on draft conditions under section 70(1)(c) of the Fast-track Approvals Act 2024.</p>
<p>JERA Nex BP (Parkwind)</p> <p>JERA-Nex-BP-Parkwind-comments.pdf</p>	<p>1 document and 1 technical appendix.</p> <p>JERA Nex bp opposes the Taranaki VTM Project, citing significant risks to offshore wind development in South Taranaki.</p>

	<p>Key concerns include:</p> <p>Economic opportunity cost: Offshore wind offers greater long-term regional and national benefits, including up to \$94 billion in GDP, thousands of jobs, and major contributions to decarbonisation. Seabed mining would jeopardise investment in offshore wind due to technical and consenting risks.</p> <p>Geotechnical risks: Fugro's assessment indicates that redeposited mining sediments are highly susceptible to flow liquefaction under storm or seismic conditions. This poses serious hazards to offshore wind infrastructure and jack-up vessels, with potential for catastrophic failure.</p> <p>Seabed instability: Liquefied sediments could flow into adjacent areas, compromising wind farm sites and existing infrastructure like the Kupe platform. Fugro recommends exclusion zones and further site-specific testing.</p> <p>Cumulative effects: Even if offshore wind and mining do not overlap spatially, cumulative environmental impacts could prevent wind projects from gaining consent.</p> <p>Visual and spatial conflict: Offshore wind may be forced closer to shore if mining proceeds, increasing visual impacts and reducing feasibility.</p> <p>JERA Nex bp urges the Panel to decline the application, stating that the adverse effects are out of proportion to the claimed benefits and cannot be mitigated through consent conditions.</p>
<p>Parliamentary Commissioner for the Environment (Rt Hon Simon Upton)</p> <p>Parliamentary Commissioner for the Environment comments</p>	<p>1 document.</p> <p>Submission outlines significant concerns about environmental and economic impacts of the project.</p> <p>Highlights almost certain destruction of benthic ecosystems and uncertain recovery timelines.</p> <p>Raises concerns about sediment plume effects, noise, treated water discharge, and potential release of stored carbon from marine sediments.</p> <p>Critiques the NZIER economic modelling as overstating benefits, lacking sensitivity analysis, and failing to account for opportunity costs, environmental damage, and discounting.</p>

	<p>Suggests a more conservative national GDP impact of \$98 million and 397 jobs, versus NZIER's \$246 million and 1,320 jobs.</p> <p>Recommends considering alternative uses of the marine space (e.g. wind energy), ecosystem service losses, and the risk to critically endangered Māui dolphin.</p> <p>Calls for robust, independently verified economic analysis and adaptive management conditions.</p> <p>Requests to be consulted on proposed conditions if the application progresses.</p>
<p>Taranaki Offshore Partnership (TOP)</p> <p>Taranaki Offshore Partnership comments</p> <p>Taranaki Offshore Partnership evidence of Dr McComb (Seabed Morphology)</p> <p>Taranaki Offshore Partnership evidence of Mr Caleffi (Corporate)</p> <p>Taranaki Offshore Partnership evidence of Mr Colegrave (Economics)</p> <p>Taranaki Offshore Partnership evidence of Mr King (Geotechnical)</p> <p>Taranaki Offshore Partnership evidence of Mr Perry (Impacts on Offshore Wind Development)</p>	<p>6 documents.</p> <p>Taranaki Offshore Partnership opposes the project.</p> <p>Submission includes legal, corporate, geotechnical, oceanographic, economic and offshore wind development evidence.</p> <p>TOP is a joint venture between NZ Super Fund and Copenhagen Infrastructure Partners, developing a 1GW offshore wind farm in the South Taranaki Bight.</p> <p>The proposed mining area overlaps with TOP's preferred wind farm site and cable corridor.</p> <p>Evidence shows seabed mining will permanently alter seabed morphology and geotechnical properties, increasing risks and costs for offshore wind development.</p> <p>Seabed instability, sediment migration, and liquefaction risk undermine foundation design, cable burial, and vessel operations.</p> <p>Economic evidence critiques NZIER modelling and highlights opportunity cost of losing offshore wind development.</p> <p>Coexistence is deemed infeasible; even adjacent development would be highly uncertain and likely unfinanceable.</p> <p>Calls for the application to be declined under sections 7, 81, 83, and 85 of the FTAA.</p>

<p>Whanganui Port Ltd Partnership</p> <p>Whangaui-Port-Ltd-Partnership-comments.pdf</p>	<p>The applicant proposes to use Whanganui Port for some of their operations but has not engaged with the Port Company.</p> <p>The port is currently under redevelopment.</p> <p>Whanganui Port Ltd have reviewed Whanganui District Council's submission to the panel and agree with their evidence and conclusions.</p> <p>Stated effects on economics.</p>
<p>Beach Energy</p> <p>Not uploaded due to commercial sensitivity reasons</p>	

APPENDIX E: Requests for Information issued by the Panel

Request for information	Date issued	Party to respond	Subjects covered	date received	Documents
Minute 6 of the panel	26/09/2025	The Applicant	Response to the EPAs s 51 report	1/10/2025	Memorandum of Counsel
Minute 9 of the panel	10/10/2025	Iwi and Hapū	Iwi and hapū specific questions		Oral submissions at the Hāwera conference
Minute 10 of the panel	16/10/2025	Minister for Oceans and fisheries	Fisheries datasets, assessment methods, and habitat impacts	20/10/2025	Response to Minute 10 (PDF, 251KB) <ul style="list-style-type: none"> Appendix 1 (PDF, 841KB) Appendix 2 (PDF, 26MB)
				31/10/2025	Response to part one of Minute 10 (PDF, 550 KB) <ul style="list-style-type: none"> Appendix Two (PDF, 791 KB) Appendix Three (PDF, 1 MB) Appendix Four (PDF, 1 MB) Appendix Five attachment 1 (PDF, 770 KB) Appendix Five attachment 2 (PDF, 875 KB) Monthly event counts 2019-24 (XLSX, 23 KB) All areas Landings By Gear 2019-24 (XLSX, 24 KB) All areas Fisher Counts By Gear 2019-24 (XLSX, 26 KB)
				22/10/2025	Response to part two of Minute 10 (PDF, 338 KB)

Request for information	Date issued	Party to respond	Subjects covered	date received	Documents
					<ul style="list-style-type: none"> • Appendix Two Map of Customary Fisheries Areas Relevant to the Taranaki VTM Project (PDF, 869 KB) • S186 Temporary closures map on Ministry for Primary Industries – website link • Rohe Moana boundaries map on Ministry for Primary Industries – website link
Minute 12 of the panel	4/11/2025	Iwi and Hāpu	Iwi and hapū perspectives and evidence	14/11/2025	<ul style="list-style-type: none"> • Te Kaahui o Rauru Trust (PDF, 613 KB) • Te Ohu Kai Moana (PDF, 1 MB) • Te Rūnanga o Ngāti Mutunga (PDF, 372 KB) • Te Tōpuni Kōkōrangī (PDF, 53 KB) • Te Tōpuni Ngārahu Trust (PDF, 316 KB) • Te Runanga o Ngāti Ruanui (PDF, 81 KB) • Appendix Part One Ngāti Ruanui (PDF, 18 MB) • Appendix Part Two Ngāti Ruanui (PDF, 20 MB) • Ngāti Hāua Hapū (PDF, 630 KB) • Te Kāhui o Taranaki (PDF, 1 MB)
Minute 13 of the panel	4/11/2025	The Applicant	Sediment distribution / modelling	9/11/2025	<ul style="list-style-type: none"> • Applicant memorandum of counsel (PDF, 199KB) • TTRL Daniel Govier evidence 15 December 2016 (PDF, 4.35MB)

Request for information	Date issued	Party to respond	Subjects covered	date received	Documents
				17/11/2025 ¹	<ul style="list-style-type: none"> Responses on behalf of Trans-Tasman Resources Limited (PDF, 103KB)
Minute 14 of the panel	4/11/2025	South Taranaki Underwater Club	Benthic habitats and species	10/11/2025	South Taranaki Underwater Club (PDF, 12.6MB)
		Wanganui-Manawatu Sea Fishing Club		10/11/2025	Wanganui-Manawatu Sea Fishing Club (PDF, 5.3 MB) <ul style="list-style-type: none"> Wanganui-Manawatu Sea Fishing Club user survey (csv, 42KB)
		Te Korowai o Ngāruahine Trust		10/11/2025	Te Korowai o Ngāruahine Trust (PDF, 426KB)
		Ngāti Hāua Hapū		10/11/2025	Ngāti Hāua Hapū (PDF, 21KB)
		Ngāmotu Marine Reserve Society			
Minute 15 of the panel	4/11/2025	Kiwis Against Seabed Mining Incorporated and Greenpeace Aotearoa Incorporated	Marine mammals		
		South Taranaki Underwater Club		10/11/2025	South Taranaki Underwater Club (PDF, 12.6MB)
		Wanganui-Manawatu Sea Fishing Club		9/11/2025	Wanganui-Manawatu Sea Fishing Club (PDF, 5.34 MB) <ul style="list-style-type: none"> Wanganui-Manawatu Sea Fishing Club user survey (csv, 42KB)
		Mr Brooks (representing Brooks Seafoods Ltd)			

¹ extension granted to applicant (17/11/2025) In [Minute 23 of the panel \(PDF, 152KB\)](#)

Request for information	Date issued	Party to respond	Subjects covered	date received	Documents
Minute 16 of the panel Minute 17 of the panel	4/11/2025	Araukuuku hapū	Birds	7/11/2025	Ngāmotu Marine Reserve Society (PDF, 1.9MB)
		Ngāmotu Marine Reserve Society			
		Kiwis Against Seabed Mining Incorporated and Greenpeace Aotearoa Incorporated			
		Taranaki Offshore Partnership			
		Ngāmotu Marine Reserve Society			
	4/11/2025	Te Rūnanga of Ngāti Ruanui	Fish	10/11/2025	South Taranaki Underwater Club (PDF, 12.6MB) South Taranaki Underwater Club (PDF, 12.6MB)
		South Taranaki Underwater Club		9/10/2025	Wanganui-Manawatu Sea Fishing Club (PDF, 5.34 MB) <ul style="list-style-type: none"> Wanganui-Manawatu Sea Fishing Club user survey (csv, 42KB)
		Wanganui-Manawatu Sea Fishing Club		15/11/2025	Brooks Seafood and Awaroa Fisheries Limited (PDF, 99KB) Image 1 (PDF, 3.4MB) Image 2 (PDF, 857KB) Image 3 (PDF, 928KB) Image 4 (PDF, 924KB) Image 5 (PDF, 140KB) Image 6 (PDF, 128KB)
		Mr Brooks (representing Brooks Seafoods Ltd) ²			

² Extension granted to M Brooks (21/11/2025) in [Minute 23 of the panel \(PDF, 152KB\)](#)

Request for information	Date issued	Party to respond	Subjects covered	date received	Documents
		Te Kāhui Maru Trust		10/1/2025	Te Kāhui Maru Trust (PDF, 898KB) <ul style="list-style-type: none"> Te Kāhui Maru Trust map (PDF, 920KB)
		Araukuuku hapū			
		Ngāmotu Marine Reserve Society			
Minute 20 of the panel	10/11/2025	The Applicant	Economics	13/11/2025	The applicant (PDF, 157KB)
		Forest and Bird		13/11/2025	Forest and Bird (PDF, 199KB)
Section 67 letter to the Minister of Conservation	26/11/2025	Minister of Conservation	Marine mammals sighting and stranding records in the wider South Taranaki Bight	28/11/2025	Blue-whale-survey-sightinbgs-OSU.pdf NZ-Marine-Mammal-Database-2025-11-27-map-points.xlsx
Section 67 letter to the applicant - November	28/11/2025	The Applicant	Carbon flux	3/12/2025	Statement of evidence - Dr Matt Pinkerton H8:H12 Statement of evidence - Dr Van de Velde (PDF, 109KB) Pooran Khedri - ICES Journal of Marine Science - MBCF and organic carbon (PDF, 3.53MB) Sebastiaan Van de Velde - Ocean alkalinity destruction (PDF, 1.94MB) Habeeb Thanveer Kalapurakkal - Sediment resuspension (PDF, 2.47MB) Lucas Porz - Dredging and dumping (PDF,

Request for information	Date issued	Party to respond	Subjects covered	date received	Documents
					826KB) Trisha Atwood - Acidification and CO2 from trawling (PDF, 3.07MB)
Minute 30 of the panel	8/12/2025	The Applicant	Economic Benefits	10/11/2025	Memorandum of counsel for the applicant in response to Minute 30 of the panel (PDF, 183KB)
Section 67 letter to the applicant - December	11/12/2025	The Applicant	Comments on the Fathom Consulting Ltd report submitted by Seafood New Zealand	12/12/2025	Response on behalf of the applicant (PDF, 245KB) Seafood New Zealand comments - Attachment 1 (PDF, 1MB)
Section 67 letter to the Minister for Oceans and Fisheries	11/12/2025	Minister for Oceans and Fisheries	Clarification of comments made by the Minister for Oceans and Fisheries	17/12/2025	Response from Minister for Oceans and Fisheries (PDF, 437KB) Appendix 1 (PDF, 875KB)
Minute 32 of the panel	12/12/2025	Iwi and Hapū	Te Tau Hauāuru deepwater rohe moana; and statistical area 040 within FMA8.	18/12/2025	<ul style="list-style-type: none"> • Te Rūnanga o Ngāti Ruanui Trust response (PDF, 121KB) • Te Kahu Maru Trust response (PDF, 260KB) • Te Ohu Kaimoana response (PDF, 182KB) • Late Memorandum of Counsel for Te Kaahui o Rauru Trust (PDF, 260KB)³
Minute 34 of the panel	23/12/2025	Authors of the Joint Witness Statement on the Fate of Tailings Backfill	Response to the supplementary evidence	9/01/2026	Statement of evidence of Gary Teear

³ Late response from Te Kaahui o Rauru submitted accepted in [Minute 33 of the panel \(PDF, 145KB\)](#)

Request for information	Date issued	Party to respond	Subjects covered	date received	Documents
Section 67 letter to the applicant	14/01/2026	The Applicant	submitted by Mr. Shawn Thompson. Comments on the report authored by Mr. Paul Taylor.	19/01/2026	Response by TTR to the review of information on finfish and fisheries

APPENDIX F: Summary of iwi evidence (other than Ngāti Ruanui)

Ngāti Maru/Te Kāhui Maru Trust

1. Ngāti Maru presented through Te Kāhui Maru Trust (the post-settlement governance entity). Settlement documents describe Ngāti Maru as an iwi of Taranaki/Whanganui, with an area of interest stretching from Mount Taranaki in the west to the Whanganui River in the east, and north to the headwaters of the Waitara River. Within the settlement narrative, Ngāti Maru's rohe and connections are expressed through named rivers and landmarks (including Waitaraiti, Manganui, Pātea, Whanganui and others), reflecting an inland-centred rohe linked to moana processes via river systems.
2. The iwi regards customary fishing as an expression of kaitiakitanga, rangatiratanga and customary rights protected under the Treaty of Waitangi.
3. Ngāti Maru emphasised that their fisheries interests are grounded in settlement arrangements and the QMS rather than being framed solely through a coastal rohe moana. As part of its settlement instruments, Ngāti Maru has a Primary Industries (Fisheries) Protocol area (mapped) and associated "adjacent waters". The Protocol establishes engagement expectations and recognises customary non-commercial interests in identified taonga species, along with participation in fisheries planning and sustainability decisions affecting those species.
4. Ngāti Maru's evidence described commercial fisheries interests held through the Māori Fisheries Settlement (including the MFA framework) and QMS settings. While not discussing in place commercial fishing, Ngāti Maru's evidence identified Statistical Areas 40 and 41 (FMA8) as the source areas for fish taken and landed for the pātaka system (2010–2025) by the commercial vessel. Te Kāhui Maru state that Taranaki iwi (including Ngāti Maru) hold commercial quota interests that would be affected if seabed mining reduces fish abundance/migration patterns or displaces commercial effort from the proposed mining area, with consequent economic loss and job insecurity for local fishers.
5. Ngāti Maru placed strong emphasis on freshwater taonga species whose life cycles depend on marine environments, including īnanga (whitebait), piharau (lamprey) and tuna (eel). Evidence highlighted tuna migration to the ocean and the return of elvers, raising concern that offshore mining effects could disrupt migratory pathways and behaviours.
6. Ngāti Maru provided evidence about the Taranaki pātaka system as a practical mechanism for meeting customary fishing needs, supporting tangihanga and sanctioned hui through a permit-based supply and distribution model. They also describe it as a shared Taranaki initiative, developed with the support of Ngā Rauru and Ngāti Ruanui and technical input from Te Ohu Kaimoana policy staff. It is now used to provide fish to eight iwi in total. Evidence described the staged development of pātaka between late 2009 and 2011, including an online authorisation and tracking system that records permits, catch, storage inventory, and distribution.

7. Ngāti Maru's RFI response provided quantitative information for fish authorised and landed through the pātaka model (2010 to 31 October 2025), including: 73,320 kg authorised; 38,101.88 kg landed; 1,212 tangi and 382 hui supported; and 400 kg in storage as at 8 November 2025. The response records sourcing from Statistical Areas 40 and 41 (FMA8).
8. In response to a Panel RFI, Ngāti Maru listed species stated to use "the area", including snapper, blue cod, tarakihi, red gurnard, trevally, hāpuku/bass, kahawai, blue warehou, jack mackerel, bluenose, John Dory, barracouta, flounder, tuna (albacore and skipjack), rig shark, and deepwater species including hoki, hake, orange roughy, and gemfish. Ngāti Maru stated these species are present across the area, with some closer inshore, some associated with reef structures, and deepwater species further offshore (including along the shelf edge), and that spawning and feeding needs drive transiting behaviour through the area.
9. In that response, Mr Tamarapa lists finfish species said to use "the area" (including deepwater species such as hoki, hake, orange roughy and gemfish) and describes them as present "across the area", with inshore, reef-associated, and shelf-edge patterns and transiting behaviour driven by spawning and feeding needs.
10. Ngāti Maru opposes the proposed seabed mining activity. They describe the South Taranaki Bight as a taonga (and wāhi tapu), tying it to identity, history and whakapapa, and state that customary fishing is an expression of kaitiakitanga and rangatiratanga protected under the Treaty. They say sediment plumes, habitat destruction and noise would devastate traditional fishing grounds, undermine food security, and erode cultural practices passed down through generations. The iwi raised concerns about sediment plumes (including smothering effects), impacts on benthic habitats and kaimoana, and broader uncertainty about ecological effects and recovery. Ngāti Maru criticised reliance on adaptive management in circumstances of high uncertainty. They say that without comprehensive baseline data and a credible impact assessment the application cannot be responsibly approved.

Taranaki Maunga/Te Kāhui Tupua

11. The Taranaki Maunga settlement provides the Treaty settlement backdrop for the establishment of Te Kāhui Tupua as a legal personality, recognising Taranaki Maunga and associated tūpuna maunga as a living and indivisible whole, with its status and wellbeing to be upheld through the values framework in the settlement arrangements. The settlement legislation then establishes two distinct entities to give practical effect to that framework: Te Tōpuni Kōkōrangi and Te Tōpuni Ngārahu Trust. The two entities have specific roles. Te Tōpuni Kōkōrangi is the statutory "voice and face" for Te Kāhui Tupua, intended to be an independent and enduring voice. Te Tōpuni Ngārahu Trust is the collective governance entity for Ngā Iwi o Taranaki for the maunga redress arrangements.

12. Against that settlement backdrop, both entities engaged in the Taranaki VTM process, but from different mandates and perspectives.
13. Te Tōpuni Kōkōrangi is a statutory body, established under the Taranaki Maunga Collective Redress Act, and is not an iwi or hapū participant. Te Tōpuni Kōkōrangi frames its standing/function/purpose as being set out in Te Ruruku Pūtakerongo (the Collective Redress Deed) and the Act and treats those as the core “Treaty settlement instruments” relevant to the Panel’s decision making. Their written comments point to a material information gap: they say the applicant’s evidence did not acknowledge that Te Kāhui Tupua is the origin of the iron sands and did not address the settlement framework for Te Kāhui Tupua. They say the application therefore needs to be assessed against the settlement architecture and values (Ngā Pou Whakaturua / He Kawa Tupua), and they treat that as directly relevant to the Panel’s consideration. They also align themselves with the wider Ngā Iwi o Taranaki position on the application.
14. Te Tōpuni Ngārahu situates itself as the collective governance entity for Ngā Iwi o Taranaki in relation to the maunga redress arrangements, with He Kawa Tupua at the centre of its mandate. In conference evidence, they explained the settlement history and described He Kawa Tupua as the “foundational” living framework (created in Te Ruruku Pūtakerongo and enacted in legislation), including the paired concepts: te mana o ngā maunga (health and wellbeing of Te Kāhui Tupua), and te mana o te Kāhui (mana/relationship of Ngā Iwi o Taranaki with Te Kāhui Tupua). Te Tōpuni Ngārahu positions itself as having a duty to “advocate and promote” the customary settlement rights of Ngā Iwi o Taranaki as defined in Te Ruruku Pūtakerongo and the Act. They treat Te Ruruku Pūtakerongo as central to the settlement framework, including He Kawa Tupua.
15. Te Tōpuni Ngārahu’s legal submissions are blunt: they are opposed and consider the application should be declined, and they endorse the cumulative position of the other iwi/Māori participants rather than duplicating their legal arguments. Their conference evidence also makes it clear that they see their role as supporting the integrity of the settlement framework and recognising who holds mana whenua/mana moana in the coastal context.

Ngāti Hāua

16. Ngāti Hāua presented to the Panel as a hapū of Ngāruahine, speaking from within the Ngāruahine settlement context and describing their rohe as extending “from Taranaki Maunga” through an expansive tongi framing (including Tawhiti-nui and Hawaiki-pāmamao). They also confirm a MACA proceeding connected to their takutai/moana interests, and state the status is awaiting the allocation of a hearing.
17. Ngāti Hāua expressly situate the instruments they rely on as including the Ngāruahine Deed of Settlement and Ngāruahine Claims Settlement Act 2016, and they identify Te Uru Taiao o Ngāruahine (Ngāruahine Kaitiaki Plan 2021) as a key document “referred to in the settlement legislation” and relevant to how they relate to place. They also ask that material connected to their MACA application (and the Minute 14) remain

confidential and not be shared publicly or with the applicant, given the MACA process is not yet heard. It would be unfair for the Panel to take account of any information not shared with the applicant, so we have disregarded it in our deliberations.

18. Ngāti Hāua's evidence is framed as "lived practice" and inherited responsibility, rather than abstract "values". They describe the passing of knowledge about "the takutai, the Moana and Tangaroa" as tikanga and kaitiakitanga, and as "a taonga of the hapū" held by pāhake and passed intergenerationally. They describe tikanga and practices including karakia before entering the takutai and before gathering resources, acknowledging spiritual guardians, and returning the first fish caught to Maru and Tangaroa. They also describe relationships with whanaunga hapū as governed by tikanga (including toha), and state: "Our hapū never turn our back on the moana – there is always someone watching Tangaroa."
19. Ngāti Hāua also describe the use of rāhui over the takutai moana and the māra, and fishing guided by "tides, stars and the moon". They state a rāhui has been in place over their māra since 2008, explained as responding to depletion of mātaītai, with monitoring undertaken by hapū kaitiaki.
20. In conference questioning about reefs, Ngāti Hāua (Rere-no-a-Rangi Pope) explained that Māori naming of reefs reflects events and whakapapa-based meaning, and that where a council may see "one reef", they may recognise multiple reefs by different criteria. Asked about the significance of reefs they had identified, he stated: "We wouldn't have named them up if they weren't. We wouldn't have fought and cried ... over these reefs. Of course, they have a very special significance to us". He also refers to access to reef areas as shaped by tikanga and place-based knowledge, including access "that other people don't, the general public don't".
21. Ngāti Hāua also link effects to process and engagement, stating that large information requests in short timeframes are "symptomatic of the applicant's poor application and poor engagement process with iwi and hapū groups".
22. On conditions, Ngāti Hāua's conference evidence is direct. Sarah Mako states: "It's actually really difficult to suggest what conditions could look like when you haven't been engaged", and links that to the absence of an "efficiently and effectively" described environment, adding: "We form part of that environment and we haven't been included". In the same exchange, she emphasises the indivisibility of effects within their rohe, stating it is difficult to differentiate effects because "if something happens in Tangaroa rohe, it affects our maunga".
23. The evidence from the hapū of Ngāruahine is consistently framed as relationship evidence rather than "effects in the abstract". Across the hapū material provided, the takutai/moana is described as a living and inherited space, with responsibilities to uphold tikanga and protect intergenerational wellbeing. Several hapū also record frustration with how engagement has occurred (or not occurred), and link that directly to their ability to meaningfully respond, including on conditions.

Ōkahu Inuāwai

24. Ōkahu Inuāwai's conference material also records that they organise their relationship with te taiao through a strongly whakapapa- and tikanga-based frame, treating whenua, awa and moana as part of whakapapa and positioning uri as a "first line of defence" for protection "for all time". They link that stance to intergenerational obligations, stating that as Māori they "walk into the future whilst looking to the past", and describing kaitiakitanga as ensuring "a liveable planet" for mokopuna. In practical terms, their climate strategy sets non-negotiable bottom lines for activities affecting te taiao, including no deep-sea mining, and a resistance to extractive approaches they associate with colonial economic models.
25. Ōkahu Inuāwai also challenge the applicant's "benefits" case as not translating into tangible benefit for their people. They state that the proposal would bring "no economic benefits to our whānau, hapū, iwi", that "the jobs will not be coming to us", and that even where employment is projected locally, "none of those required skill sets will benefit our region". They treat this as compounding the imbalance they see in the process, where hapū carry significant risk and resourcing burden while benefits accrue elsewhere.
26. Their written comments also take a firm position on process and relief: they record that further engagement is needed and ask the process be paused so issues can be properly worked through. They also state, in plain terms, that they will actively oppose the proposal, and link that opposition to the way the application is said to threaten their ability to continue customary practices and harvesting (including through effects they associate with disturbance and pollution).

Kānihi Ūmutahi

27. Kānihi Ūmutahi present themselves as a hapū of Ngāruahine with mana whenua/mana moana responsibilities that extend into the marine environment, and they explicitly frame their interests as continuous across the coastal environment. They describe the moana as a lived domain of customary practice and responsibility, rather than a space that can be segmented into "project area" and "everywhere else".
28. On effects, Kānihi's comments focus on the risk that works of the kind proposed will compromise the mauri of the environment and interfere with customary relationships and practices (including fishing-related activity), and they identify this as a core reason for their opposition. They also join a consistent Ngāruahine hapū theme: it is difficult to talk meaningfully about conditions when engagement has been inadequate and the hapū relationship evidence is being treated as "supplementary" rather than foundational.

Ngāti Manuhiakai

29. Ngāti Manuhiakai's evidence is explicitly values-and-place based: they describe the whenua and seas as living and present their relationship to the moana as an intergenerational obligation carried through tikanga and cultural practice. They emphasise that these obligations are not theoretical, and they describe the moana as part of identity, wellbeing, and continuity for whānau and hapū.
30. Their comments also state a clear position on the proposal: they oppose it and describe anticipated effects in practical terms including disturbance-related impacts (including noise) and sediment-related impacts, and the way those effects would undermine cultural practice and kaitiaki obligations.

Ngāti Tū

31. Ngāti Tū's comments are direct about worldview and jurisdiction: they state that EEZ boundaries are foreign constructs and do not reflect how they understand and exercise mana moana, which is framed as continuous and tikanga-based. They locate their stance in an inherited relationship with the moana and express concern about the proposal in terms of unacceptable interference with that relationship.
32. Their position is recorded as opposition to the proposal, and they link that opposition to the risk of harm to the moana and to the inability to rely on process or conditions as a substitute for meaningful engagement and a proper foundation of information.

Araukuuku

33. Araukuuku describe a long-standing, practical relationship with their moana rohe, including customary practice and the ongoing exercise of mana moana responsibilities across the takutai and wider marine environment. They also record that their relationship interests are shared and interconnected with other hapū and whanaunga, and they treat this as relevant to how effects should be understood (as relational and cumulative, not neatly "contained").
34. Araukuuku are opposed to the proposal. They also align themselves with, and rely on, the wider Ngāruahine and hapū evidence record, including concerns about insufficient engagement and the risk of serious impacts to marine values and customary practice.
35. Te Patutokotoko also participated alongside Araukuuku and Ngāti Tū in joint hapū material focused on ensuring the Panel's process enables hapū evidence to be properly heard.

Nga Tangata

36. Nga Tangata Tiaki o Whanganui, representing Whanganui iwi, made comments framed on the Whanganui iwi identity through an ancestral relationship with Te Awa Tupua that runs “from the mountains to the sea” and connects directly to Tangaroa. They describe this as an indivisible whole (physical and metaphysical) and a relationship of whakapapa and duty: “Ko au te Awa, ko te Awa ko au” (I am the river and the river is me).
37. Nga Tangata focus their “settlement context” on the national Māori Fisheries Settlement framework. They state Whanganui were required to establish a Mandated Iwi Organisation by 2006 to accept their fisheries settlement assets (recorded as valued at just over \$5.6 million at the time of transfer). Nga Tangata describe the establishment of Te Whiringa Muka Trust (constituted 1 October 2006) to receive and manage fisheries settlement assets, and the formation of Whanganui Iwi Fisheries Limited (established 2006) as Te Whiringa Muka’s commercial arm. They also state that on 4 August 2024 Ngā Tangata Tiaki o Whanganui was established as the post-settlement governance entity for Whanganui Iwi for the purposes of the Whanganui River settlement, and that once the Whanganui River settlement Bill was enacted Te Whiringa Muka was dissolved and its responsibilities, assets and liabilities vested in Ngā Tangata (with Whanganui Iwi Fisheries Limited remaining as a separate company).
38. Nga Tangata emphasise that their relationship with fisheries is both cultural and economic, and that they have active structures to manage commercial interests. In their comments, Nga Tangata record that their commercial fisheries assets were established through the post-settlement fisheries framework and are held and managed through iwi entities for the benefit of their people. Nga Tangata state Whanganui Iwi Fisheries Limited has actively traded its Annual Catch Entitlement to increase profit shares for Te Whiringa Muka and ultimately the hapū of Te Atihaunui a Paparangi and other Whanganui iwi.
39. Nga Tangata also describe extensive work and collective agreements and commercial strategies with neighbouring iwi (including Ngā Rauru Kītahi and Ngā Wairiki Ngāti Apa) and more broadly all iwi of FMA8. They further state they have explored “cooperative enterprises” with other iwi of Te Tai Hauāuru.
40. The “mountains to the sea” framing is a key emphasis in their evidence. It is used as a decision-making lens: the Whanganui iwi strategy document Nga Heke Ngahuru set out that Te Awa Tupua must be addressed as an integrated whole, and that the river’s health is inseparable from the wellbeing of its communities and (by extension) its receiving environments.
41. Nga Tangata state they “object in totality” to the application. They say extraction of iron sand affects the “mauri of Tangaroa” and therefore the kawa central to their role in the care and protection of their rohe moana. Nga Tangata also say the identified area includes resources and habitat used for life cycles and seasonal migration of fish that

comprise their customary and commercial fish stocks, and that the activities will have adverse implications for the rights and commercial interests held through Te Whiringa Muka / Whanganui Iwi Fisheries Limited (including cooperative enterprises explored with other iwi of Te Tai Hauāuru). Nga Tangata say the environmental effects of the sediment plume on ecosystems have not been resolved, and that this is of particular concern given the “unknown impacts on the customary and commercial fisheries”.

42. Nga Tangata consider that TTRL have failed to establish any enduring relationships with Te Atihaunui a Paparangi or the hapū whose interests lie within the mapped areas. They confirm support for the comments of Te Korowai o Ngāruahine Trust, Ngāti Ruanui, Te Kāhui o Rauru, and Taranaki iwi, and also support Te Ohu Kaimoana’s response and role in working alongside their iwi to protect rights and interests derived from the Māori Fisheries Settlements and related legislation.
43. Nga Tangata and Whanganui iwis oppose the project. They object to being the first community exposed to untested impacts, and they oppose the proposal proceeding on the current footing. Nga Tangata’s closing emphasis is intergenerational responsibility, captured through the quote they chose to end with: “Our responsibilities are beyond our lifetimes and those of our children.”

APPENDIX G Table comparing impacts and benefits

This table provides a synthesis of the project's benefits and key adverse impacts that have been assessed throughout the decision. It has been developed to assist the Panel in its decision-making process, and particularly the proportionality assessment required under s 85(3), which can be found in section 34.2 of the decision. This table (and our section 34.2 conclusions) should be read in conjunction with the Panel's interpretation of s 85(3) – (5) of the FTAA set out in section 3.

An adverse impact is “any matter considered by the panel in complying with s 81(2) FTAA that weighs against granting the approval”. As such, the adverse impacts summarised below include findings on effects, as well as other matters that the Panel must consider in assessing the application (including when information was not the best available or was uncertain, or when best practice was not evident, or where the project is inconsistent with the nature and effect of other marine management regimes). The Panel has not formed the view that an adverse impact meets the proportionality threshold *solely* on the basis that the adverse impact is inconsistent with or contrary to a provision of a specified Act or any other document that a Panel must take into account or otherwise consider in complying with section 81(2). The Panel is satisfied that the s 85(3) threshold would be met without including consideration of inconsistency with an Act or document.

This table does not include all adverse impacts. Rather it includes only those impacts that the Panel considers to be of sufficient significance to be considered in the s 85(3) evaluation exercise. Conversely, all of the regional and national benefits of the project, as determined by the Panel, are included in the table.

The Panel notes that the ‘significance’ ratings applied in the table (denoted by one or two asterisks) are not based on a mathematical approach or a specific evaluation framework. Instead, these ratings provide a relative indication of the significance (or importance) of the respective issues for our decision making.

Key:

* lower significance, ** higher significance

Benefits	
Type	Significance
<i>National benefits</i>	
Diversification of national economy - Establishment of offshore seabed mining industry in STB through foreign investment - New Zealand contribution to global supply of critical minerals (in the form of VTM ore)	*
Workforce development, upskilling - Industry specific training and certification courses at Hawera training facility	minimal
GDP (Direct, Indirect, Induced) Impacts	*

<ul style="list-style-type: none"> - Pre-commencement stage gross GDP impacts up to, but likely somewhat less than \$62 M spread over 2-3 years - Operational gross GDP impacts of up to, but likely somewhat less than \$265 M per annum over 20 years 	
<p>Employment (Direct, Indirect, Induced) Impacts</p> <ul style="list-style-type: none"> - Pre-commencement stage gross employment impacts up to, but likely considerably less than 459 new jobs spread over 2-3 years - Operational gross employment impacts of between 303 and up to, but likely considerably less than 1,365 new jobs, most for a 20 year period. These employment impacts would be lower if TTRL employs overseas workers who do not permanently move to New Zealand 	*
<p>Average household income increase</p> <ul style="list-style-type: none"> - Marginal increases in average household incomes where wages or salaries increase as a result of TTRL's direct employment or as a flow on effect of TTRL's expenditure 	minimal
<p>Charitable Trust for South Taranaki District</p> <ul style="list-style-type: none"> - Funding of \$50,000/annum (inflation adjusted, less administration fees) to South Taranaki District Council for community investment 	minimal
<p>Royalties</p> <ul style="list-style-type: none"> - Potential, but uncertain, royalties paid to the Crown indicatively between \$21m and \$61m per annum over a 20 year period 	*
<p>Tax contributions</p> <ul style="list-style-type: none"> - Potential, but uncertain, corporate tax contributions indicatively between \$55m and \$154m per annum, but also potentially much less than this lower range in some years 	*
<p>Climate related benefits</p> <ul style="list-style-type: none"> - Potential, but uncertain, gross indirect climate-related benefits for New Zealand through supply of feedstock for lower emission steel production and/or the manufacturing of products that support clean energy 	minimal
<i>Regional benefits</i>	
<p>Diversification of regional economy</p> <ul style="list-style-type: none"> - Establishment of offshore seabed mining industry in STB through foreign investment 	*
<p>Workforce development, upskilling</p> <ul style="list-style-type: none"> - Industry specific training and certification courses at Hawera training facility 	*
<p>GDP (Direct, Indirect, Induced) Impacts</p> <ul style="list-style-type: none"> - Pre-commencement stage gross GDP impacts up to, but likely somewhat less than \$27 M spread over 2-3 years - Operational gross GDP impacts of up to, but likely somewhat less than \$222 M per annum over 20 years 	**
<p>Employment (Direct, Indirect, Induced) Impacts</p> <ul style="list-style-type: none"> - Pre-commencement stage gross employment impacts up to, but likely considerably less than 211 new jobs spread over 2-3 years 	**

- Operational gross employment impacts of between 225 and up to, but likely considerably less than 1,123 new jobs, most for a 20 year period.	
Average household income increase - Marginal increases in average household incomes where wages or salaries increase as a result of TTRL's direct employment or as a flow on effect of TTRL's expenditure	*
Charitable Trust for South Taranaki District - Funding of \$50,000/annum (inflation adjusted, less administration fees) to South Taranaki District Council for community investment	*

Adverse Impact¹	
Type	Significance
<i>Sediment distribution</i>	
Uncertainty regarding suspended sediment plume and sediment deposition scale and extent, in circumstances where scale and extent of sediment impacts are critical to assessing consequential effects on the environment or existing interests	**

¹ In some instances information is both uncertain and not the best available. The reasons why information is uncertain or not the best available are not repeated where this would involve duplication.

<ul style="list-style-type: none"> - The model results as presented do not provide an adequate picture of the areas within the STB that are likely to be affected by suspended sediment, especially for bottom waters and patchy habitats and other sensitive near-bed receptors - Model results extracted as 12-hourly averages mask tidal and event-scale peaks and reduce high-percentile estimates - The model sometimes underpredicts bottom water observations by factors of 5–10, particularly during storm driven peaks, meaning that background bottom water SSC predictions are materially uncertain - The modelled “worst case scenario” may not predict worst case conditions for specific sensitive receptors - There is a high degree of uncertainty in the predicted sediment deposition beyond 3 km from the mining area. Effects in this area cannot be characterised as negligible without an ecological effects assessment that addresses the sensitivity of the receiving environment - It is plausible that the model predictions may not be representative of those experienced over the proposed consent period. It would have been reasonable for the applicant to describe based on publicly available long-term datasets, the likely direction and scale of changes in hydrodynamics arising from climate change and to describe implications for predicted effects - Proposed conditions do not confirm or control plume scale and extent - Uncertainty on whether compliance thresholds can protect sensitive receivers from material harm as compliance thresholds not justified (how set, level of protection they provide) - High level of uncertainty regarding OSPM effectiveness. Conditions lack critical detail for OSPM development and calibration 	
<p>The panel has not been provided with the best available information in relation to some aspects of the sediment plume</p> <ul style="list-style-type: none"> - Suspended sediment plume model results extracted as 12-hourly averages are not best available information - Quantitative information about the frequency and duration of SSC elevations was not provided - The applicant could have reasonably provided a more informative description of potential deposition impacts beyond 3 km, including ecologically relevant sediment deposition mechanisms - Data for sediment modelling was collection prior to 2015 - more comprehensive data collection to address seasonal coverage and deployment duration issues likely to be reasonably practicable for the purposes of this application but not provided 	**
<p>Sediment model calibration does not reflect best practice in relation to an industry or activity</p>	*
<p><i>Underwater noise generation</i></p>	
<p>Uncertainty regarding noise that would be generated by the project</p> <ul style="list-style-type: none"> - The assessment is largely restricted to the IMV and crawler as modelled sources does not represent a realistic worst-case for total project noise. It is important to understand the realistic worst-case scenario to enable the full envelope of effects to be described and considered 	**

<ul style="list-style-type: none"> - Condition 11 is constrained to two noise sources and therefore provides limited assurance as to the full underwater noise footprint of the mining operation - Information on operationally practical mitigation and response options demonstrating how noise could be reduced to compliant levels is lacking - The conditions do not provide any direct control over noise levels from sources that only operate periodically and at locations other than in the near-field of the IMV - Uncertainty about whether the monitoring regime would adequately collect and analyse data to inform compliance decisions, especially when measured levels fluctuate around single-value limits - Conditions do not require an underwater noise monitoring plan 	
Applicant's approach to noise modelling is not consistent with best practice	*
<p>The panel has not been provided with the best available information in relation to noise</p> <ul style="list-style-type: none"> - How often, and for what duration, the noise levels calculated in the sensitivity analyses may be reached - Noise generated by all activities associated with the proposed mining operation - Ambient (baseline) underwater noise and how the project would change this noise 	**
Effects on the benthic environment	
<p>Effects on benthic ecosystems constitute material harm</p> <ul style="list-style-type: none"> - Predicted changes to <i>Euchone</i> wormfields, including altered community structure and reduced seabed stability constitute material harm. Recovery of <i>Euchone</i> wormfields is uncertain and no information has been provided that would reliably remedy or mitigate those effects once they occur - Effects on rocky reefs within 2-3 km of the project area - Effects on rocky reefs at downstream sites that are cumulatively affected by direct sediment impact and macrofauna primary productivity impact (The Crack 2, The Crack 1, Graham Bank, and Source A to Whanganui 20) - Mining within 3 km of any potential rocky reef habitat within 3 km of the mining area would cause significant adverse effects on rocky reef habitat in the CMA - In parts of the CMA where receptors with high vulnerability to the impacts from suspended or deposited sediment and reductions in light are located downstream from the mining area, it is probable that these effects reach a magnitude that constitutes significant adverse effects 	**
<p>The panel has not been provided with the best available information in relation to benthic effects</p> <ul style="list-style-type: none"> - Ecological consequences of a changed soft sediment community structure not assessed - The applicant has not adequately surveyed the area within 3 km of the mining area for rocky reefs, despite it being identified in February 2024 as an area with potential for significant ecological impact on reef habitat - The applicant has not adequately described rocky reef habitats, flora and fauna and how they are expected to be impacted by sediment 	**

<ul style="list-style-type: none"> - The applicant has not assessed the risk from potential flow liquefaction on biogenic shell and bryozoan rubble habitats located offshore beyond ~45–50 m 	
The applicant's assessment of effects on rocky reefs is based on uncertain information	**
<i>Effects on the water column</i>	
<p>There is uncertainty about water column effects</p> <ul style="list-style-type: none"> - The results of the optical modelling carry unquantified uncertainties and therefore need to be considered as estimates of predicted change. Actual effects could be less or more intense than predicted - The proposed conditions and monitoring do not provide a reliable framework to ensure, or to verify in practice, that optical effects would be no greater than anticipated. - The applicant's late update of the primary production assessment with the worst-case modelling (and the continued gaps in that update) has resulted in inadequate information being presented on primary production effects. - The nature and extent of any adverse impact associated with brine discharge is uncertain and not conditions are proposed that require the salinity of the discharge (before or immediately after discharge, or near sensitive receptors) to be measured or controlled 	**
<p>Effects on benthic primary production constitute material harm</p> <ul style="list-style-type: none"> - Impacts on primary production of macroalgae in downstream sensitive areas (including The Crack 2, The Crack 1, Graham Bank, and Source A to Whanganui 20) are highly likely and at a magnitude that would likely affect the composition and functioning of rocky reef flora and constitute material harm - The proposed conditions are not sufficient to maintain conditions that avoid chronic turbidity and excess sediment deposition in areas rocky reefs 	*
<i>Effects on marine mammals</i>	
<p>There is uncertainty regarding effects of suspended sediment on marine mammals, including:</p> <ul style="list-style-type: none"> - The area affected by sediment (in space and time) - The potential consequences of an increased unpredictability of foraging habitat - Effects on vulnerable life stages include calving, migration, breeding and foraging 	*
<p>There is uncertainty regarding noise effects on marine mammals</p> <ul style="list-style-type: none"> - - The application lacks an species-specific assessments of effects from chronic exposure of noise from the 20 year long mining operation - The assessment depends on modelling assumptions, noise thresholds and operational controls that are contested or inadequately evidenced - It would have been possible and reasonable for the applicant to reduce key uncertainties in the assessment of noise effects by modelling worse- or realistic worst-case scenarios (e.g., different noise sources or source levels) and using 	**

<p>scenarios to present a more comprehensive envelope of effects based on the range of plausible model outcomes and expected variability in actual effects</p> <ul style="list-style-type: none"> - The proposal is to identify indicators of adverse effects in the Marine Mammal Management Plan creating uncertainty on whether effects on marine mammals could be reliably measured and effectively responded to through monitoring and the MMMP as presently framed 	
<p>Some information relating to noise effects on marine mammals is not the best available information</p> <ul style="list-style-type: none"> - Utilising specific species responses (the Professor Würsig review) in the interpretation of underwater noise modelling would have improved the specificity and robustness of the noise effects assessment - The species-specific review by Professor Würsig was conducted in 2014 and it is likely that new information on specific species responses to underwater noise has become available since, which could have been used to provide a more current review - The noise limits in Condition 11 are not based on best available information 	**
<p>Material harm to Māui dolphins is likely and there is a credible risk of material harm to other marine mammal species</p> <ul style="list-style-type: none"> - The proposal would not avoid exposing Māui dolphins to combined underwater noise at or above 135 dB re 1µPa for the IMV and crawler, within 500 m of the mining area. Exposure at or above that level is likely to result in behavioural responses that would amount to material harm - The proposal is to measure actual noise six months after the commencement of mining. Māui dolphins may be exposed to noise levels capable of causing material harm and significant adverse effects during that period - Uncertainty whether conditions limiting noise exposure sufficient to protect marine mammals from material harm - Conditions have general outcomes to be achieved e.g. “avoid adverse effects” but are ineffective to ensure those outcomes are achieved: <ul style="list-style-type: none"> o Proposed underwater noise conditions do not operate as a precautionary framework in relation to ambient noise, because they do not require monitoring or assessment of whether the activity increases average ambient noise levels nor provide a mechanism to detect or respond to cumulative increases over time. Accordingly, biologically meaningful impacts could occur without being identified or managed o Two years pre-commencement monitoring may be insufficient to provide a statistically meaningful baseline for the assessment required under Condition 10. The applicant has not provided sufficient information as to how this would be addressed and managed 	**
<p>The assessment of effects on marine mammals does not reflect best practice:</p> <ul style="list-style-type: none"> - The failure to utilise updated species-specific responses to underwater noise in the effects assessment is not consistent with best practice 	*
<i>Effects on seabirds</i>	
<p>There is uncertainty of information and a credible risk of material harm to kororā/little penguin and fairy prion:</p> <ul style="list-style-type: none"> - There is a credible risk of material harm from the proposed mining operation to kororā/little penguin 	**

<ul style="list-style-type: none"> - The information provided by the applicant on fairy prion is uncertain and inadequate. Given the available information, there is a credible risk of material harm to fairy prions from the Takapourewa Stephens Island colony - A number of the uncertainties and risks identified for kororā/little penguin and fairy prion also arise for other seabird species that use the STB, including petrels, shearwaters, shags, gulls and terns that rely on visual foraging, reef-associated prey, or are vulnerable to artificial lighting at sea. Given these uncertainties and expert evidence before it on the potential magnitude of impact, the Panel is not satisfied that the impacts on other seabird species would be at a non-material level. - The proposed conditions lack specific objectives and measurable indicators for identifying and assessing adverse effects. In combination with the inherent complexity of undertaking seabird surveys this creates high uncertainty about the applicant's ability to monitor and manage adverse effects, including preventing material harm to seabirds 	
<i>Effects on fish</i>	
<p>There is uncertainty regarding effects on fish</p> <ul style="list-style-type: none"> - The project presents credible risk of adverse local effects on fish distribution and habitat function, particularly at sensitive reef and nursery habitats and for benthic feeders that have high site fidelity and are resident in habitats in the mining site and the area affected by the suspended sediment plume. Those effects and their likelihood and magnitude are subject to material uncertainty that has not been fully resolved in the application materials - The project presents a credible risk of adverse effects on fish distribution from underwater noise from mining activities through avoidance and redistribution. The magnitude, duration, and spatial extent of such effects remain uncertain - The Panel is not satisfied that those risks can be reduced to a non-material level through conditions 	*
<p>Some information relating to effects on fish is not the best available information</p> <ul style="list-style-type: none"> - The applicant's assessment is framed primarily at the scale of overall population or stock sustainability within the relevant Fisheries Management Area or the STB with little consideration of localised effects, which can be ecologically important - The applicant has proposed a conditions framework primarily directed at managing sediment generation, deposition and associated benthic effects, rather than fish-specific effects 	*
<i>Environmental effects of discharge to air</i>	
<p>There is uncertainty regarding ecological effects on air quality</p> <ul style="list-style-type: none"> - The applicant has not assessed the cumulative emissions of all vessels. The absence of these emission sources creates doubt on what the net effect of emissions may in fact be - Ocean acidification is an important stressor for marine ecosystems. The potential for localised impact was not assessed by the applicant. In the absence of an assessment, it is unknown whether the amount of sulphuric acid expected to enter the ocean would have an adverse impact on the marine environment in the STB and what the nature of such an effect may be. This represents a gap in the information before the Panel 	*
<p>Some information relating to sulphur dioxide emission is not the best available information:</p>	*

<ul style="list-style-type: none"> - The applicant has not provided the Panel with information on the impact on the marine environment from sulphuric acid entering the ocean 	
<i>Effects on seabed geomorphology</i>	
<p>There is uncertainty regarding effects on seabed geomorphology</p> <ul style="list-style-type: none"> - Pit migration has the potential to change seabed morphology over an area well beyond the mining area over decades and centuries after mining has discontinued. The applicant has not assessed this process in any detail, including potential implications for benthic habitats. The Panel cannot determine with any confidence the nature and extent of any adverse impact associated with pit migration 	*
<p>There is uncertainty of information and risk of material harm to benthic habitats from the fate of tailings backfill</p> <ul style="list-style-type: none"> - The fate of the tailings backfill, including the risk of flow liquefaction and related runout, is materially uncertain. Given the significant uncertainties and the lack of options for mitigating or managing the risks of flow liquefaction from loose tailings and noting that triggering storm or seismic events are outside the applicant's control, the Panel is not satisfied that those risks, including potential implications for benthic habitats, can be reduced to a non-material level through conditions 	**
<i>Natural character, seascape and visual amenity effects</i>	
<p>Effects on natural character would be significantly adverse in the CMA</p> <ul style="list-style-type: none"> - The proposal would significantly affect the level of natural character within the project area and in parts of the CMA, including some of the identified areas of outstanding natural character - A notable impact on the existing level of natural character occurs as a consequence of what would be adverse visual amenity effects on water clarity (both within the EEZ and CMA), particularly at locations for recreation and which are deemed to be ecologically and culturally important - The geomorphological impacts of the project are projected to persist for decades to centuries. The consequence of such effects is a notable reduction in the natural character of the project area and beyond for at least the period of the mining, and in some respects (such as geomorphology and suspended sediments well beyond the period of proposed mining) 	<p>**</p> <p>*</p> <p>*</p>
<i>Changes in carbon flux to, and release from, the seabed</i>	
<p>There is uncertainty of information in the changes in carbon flux to, and release from, the seabed associated with the project</p> <ul style="list-style-type: none"> - Release of a non-trivial but unquantified (and likely unquantifiable) amount of seabed-stored carbon. The release of seabed-stored carbon into seawater may result in changes in organic carbon remineralisation and seafloor alkalinity to an unknown degree - Marine carbon sequestration reduced by about 5-11 ktC/y (thousand tonnes per year), which is equivalent to releasing an additional 0.03 - 0.05% of New Zealand's annual gross carbon dioxide emissions per year (excluding the effect of mining on benthic macroalgae) 	*

<i>Cumulative effects</i>	
Cumulative effects on rocky reef habitats, fish, marine mammals and associated existing interests have not been robustly assessed and appropriately addressed	**
<i>Treaty and tikanga-based existing interests other than fishing</i>	
<p>The project would adversely affect Treaty Settlement and tikanga-based existing interests other than fishing</p> <ul style="list-style-type: none"> - Tikanga-based relationships with the moana and its resources, tikanga-based customary rights and interests identified within MACA Act applications would be materially adversely impacted by the project, including through effects on mauri and constraints on the practical exercise of kaitiakitanga (including tikanga-led management responses such as rāhui and the protection of taonga species including Māui dolphins and blue whales) - Effects on Treaty settlement-based interests arise through these impacts as well as the ecological impacts of the project. Taken together, those impacts would materially limit the ability of iwi to carry out the settlement-recognised roles they were given, and to participate in the protection and management of the moana through the statutory and relationship mechanisms established by settlement. - The Ngāti Ruanui Fisheries protocol and or Department of Conservation protocol would not be able to operate with practical integrity. Approving the project would therefore be inconsistent with the obligation to uphold the practical integrity of Ngāti Ruanui's Treaty settlement. - The Ngā Rauru Kītahi Fisheries protocol and or Department of Conservation protocol would not be able to operate with practical integrity. Approving the project would therefore be inconsistent with the obligation to uphold the practical integrity of Ngā Rauru Kītahi's Treaty settlement. - The Ngāruahine Fisheries protocol, Department of Conservation protocol, or the Ngāruahine Kaitiaki Plan would not be able to operate with practical integrity. Approving the project would therefore be inconsistent with the obligation to uphold the practical integrity of Ngāruahine's Treaty settlement. - The settlement instruments negotiated by Taranaki iwi would not be able to operate with practical integrity in the manner contemplated by the settlement. Approving the project would therefore be inconsistent with the obligation to uphold the practical integrity of the Taranaki iwi Treaty settlement. 	**
<i>Effects on Māori fishing existing interests</i>	
<p>There is a credible risk of material adverse effects on Māori commercial and customary fishing existing interests</p> <ul style="list-style-type: none"> - Māori commercial and customary fishing existing interests would be adversely affected by localised displacement, operational exclusion, and loss of practical access and certainty arising from project's mining footprint and the broader footprint of plume- and noise-related effects - The risk of material adverse effects on Māori commercial and customary fishing existing interests particularly arises where the ability to absorb displacement is constrained by regulatory, spatial and operational factors - These effects would materially constrain the practical use of settlement-derived quota and ACE, and will materially undermine customary fishing practices and management mechanisms that rely on access to known fishing grounds and predictable conditions 	**

<i>Effects on other commercial fishing existing interests</i>	
<p>There would be adverse effects on commercial fishing existing interests</p> <ul style="list-style-type: none"> - The project would adversely affect commercial fishing interests through localised exclusion, displacement of fishing effort, increased operating cost and risk, and uncertainty that alters fishing behaviour and market participation. - The consequences of displacement are not evenly distributed. They fall most heavily on fisheries and fleets that are method-dependent and ground-dependent, and on operators with limited alternative options due to regulatory settings, vessel capability, and cost constraints. 	*
<i>Effects on recreation existing interests</i>	
<p>There would be significant adverse effects on recreation existing interests</p> <ul style="list-style-type: none"> - Key dive sites would be significantly adversely affected by the reduced clarity for much longer periods than occurs normally 	*
<i>Effects on oil and gas existing interests</i>	
<p>There is uncertainty regarding liquefaction and tailings impacts (seabed stability) on existing and future use and development of oil and gas existing interests</p>	*
<i>Effects on human health</i>	
<p>There is uncertainty regarding effects on human health:</p> <ul style="list-style-type: none"> - The applicant has not assessed the cumulative emissions of all vessels. The absence of these emission sources creates doubt on what the net effect of emissions may in fact be. - The maximum 24-hour SO₂ onshore exceeds the WHO 24-hour guideline. There is a residual risk that if people occupy the coastline in areas in which the World Health Organization guideline is exceeded, they could be adversely impacted from the SO₂ emissions from the reciprocating engines. The Panel cannot rule out the risk from emissions to people with high health risks, especially people with asthma, who use the area for extended durations. - Inconsistency between the assumption on work patterns of the Workplace Exposure Standards and the planned operation of the IMV, an omission of emissions from other operational vessels in the assessment and a missing assessment of risk to people working on the FSO creates uncertainty. Therefore, the Panel is not satisfied that people working on operational vessels are not exposed to SO₂ at levels that pose risk to human health 	*
<p>Some information relating to effects on human health is not the best available information:</p> <ul style="list-style-type: none"> - The human health assessment was conducted in 2014 and insufficient information has been provided on how operational assumptions made in that assessment compare to those of the current application 	*
<i>Protection of biological diversity and integrity of marine species, ecosystems and processes</i>	
<p>Allowing the activity would result in:</p>	**

<ul style="list-style-type: none"> - Complete removal of benthic communities within the mining footprint, followed by recovery to altered community states of uncertain ecological function, particularly in relation to <i>Euchone</i> wormfields and sediment-stabilising habitats, with associated uncertainty about long-term seabed stability and sediment mobility. - Local to sub-regional reductions in benthic primary productivity and energy supply to benthic food webs at sensitive downstream sites such as Graham Bank and The Crack, at magnitudes likely to affect the composition and functioning of rocky reef flora for the duration of mining. - Material harm to rocky reef and biogenic habitats within 2–3 km of the mining area, and significant adverse effects on downstream sensitive reefs in the CMA such as The Crack and Graham Bank. We also find that there is very little reliable information on how rocky reef communities in the STB would recover if they are adversely affected and no reliable remedial measures beyond avoidance or spatial exclusion. - Sustained changes, over the 20-year operational period, in the distribution and relative abundance of fish species and in predator–prey relationships for parts of the STB, including reduced use of some rocky reef and soft-sediment habitats, even if regional-scale fish species richness is maintained. - Substantial uncertainty about the full underwater noise footprint and the effectiveness of proposed consent limits and responses for sensitive high-frequency marine mammals, particularly Māui dolphins, such that material harm would likely occur within the EEZ and a credible risk of significantly adverse effects on Māui dolphins within the CMA arises. - A credible prospect of material harm to threatened seabirds, especially kororā/little penguin and fairy prion, given likely spatial overlap with the plume and project lighting, inadequate information on populations and vulnerability, and the absence of a conditions framework shown to be sufficient to prevent material harm to these species. 	
<i>Protection of rare and vulnerable ecosystems and the habitats of threatened species</i>	
<p>The proposal would cause rare and vulnerable ecosystems, specifically <i>Euchone</i> wormfields, rocky reef and biogenic habitats, and the habitats of threatened species, notably Māui dolphins, blue whales, kororā/little penguin and fairy prion, to be materially harmed and, within the CMA, significantly adversely affected, including in circumstances where recovery is uncertain and effective avoidance, remedial and mitigation measures are not available.</p>	<p>**</p>
<i>Nature and effect of other marine management regimes</i>	
<p>The proposal is not consistent with the nature and effect of:</p> <ul style="list-style-type: none"> - the RMA's sustainable management purpose and relevant NZCPS provisions - the Fisheries Act - the Hector's and Māui Dolphin Threat Management Plan (which provides for its objectives to be met through interventions under the EEZ Act) 	<p>** ** *</p>