

6 October 2025

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Sealord Group Limited Submission on the notice of application by Trans-Tasman Resources Limited, and invitation to comment under the Fast-track Approvals Act 2024 (Act)

Introduction

1. Sealord Group Limited (**Sealord**) welcomes the opportunity to provide feedback in relation to the Trans-Tasman Resources Limited (**TTR**) application with the Environmental Protection Authority (**EPA**) for the Taranaki vanadium-rich titanomagnetite concentrate (**VTM**) project (**Application**). Sealord has been invited by the Taranaki VTM expert panel to comment on the Application under sections 53 and 54 of the Act.
2. Sealord is a leading Australasian seafood business, which is the largest New Zealand fishing quota holder and, together with its subsidiaries, is the employer of more than 1,500 people. In addition to operating six deepwater vessels in New Zealand and a processing site in Nelson, Sealord also owns Christchurch-based Independent Fisheries (which operates a further three vessels), the Tasmanian salmon and ocean trout producer, Petuna Aquaculture, and is a 50% shareholder of Greymouth-based Westfleet Seafoods. Established in 1961, a 50% interest in Sealord was acquired by Māori in 1992 in connection with the Treaty of Waitangi fisheries settlement. This interest is held by Moana New Zealand (Aotearoa Fisheries Limited) for the benefit of all Māori. The other half of Sealord is owned by global seafood company Nissui Corporation.
3. Sealord operates exclusively in middle-depth and deepwater trawl fisheries. A critical area of operation for our pelagic trawl fleet is the South Taranaki Bight (**STB**). In this area we target jack mackerel, blue mackerel, and barracouta – these important commercial species are growing in abundance and appear to be resilient to climate change. The fishery has the lowest level of non-fish bycatch in New Zealand and operates predominantly with true pelagic trawling and some very light-touch bottom contact.
4. Sealord has reviewed, and supports, the submissions in relation to the Application made by both Seafood NZ and Te Ohu Kaimoana.
5. Based on consultation with industry colleagues Sealord Group does not support approval of the Taranaki VTM project.

Sealord comments on the Application

Interaction between the proposed impacts and Sealord fishing operations

6. The West Coast North Island (**WCNI**) pelagic fishery operates between Cook Strait in the south up to Kaipara Harbour in Northland. Commercial fish stocks encountered by the pelagic jack mackerel fleet include JMA7, EMA7, SNA7, SNA8, FRO7,8,9, PIL7&8, and BAR7 (often active avoidance of KIN7&8 and SNA7&8 for the deepwater fleet). Although the area is extensive these fisheries are highly mobile and can be significantly different from year to year. Fishers move between northern and southern areas and from close-to-the-line (46m exclusion) out to the edge of the shelf in order to target the best mackerel schools. Fishers are choosing where to fish based not-only on target species abundance but also on teleost bycatch mix, fish size, and protected species avoidance – hence potential impacts from the TTR operation may affect not just the local access to the fishery but the whole of ECSI offshore fishing operations.
7. Sealord pelagic fleet vessels are larger than 46m so are prohibited from fishing in the area of the actual mining consent. However, they do on occasionally trawl along the 20nm exclusion boundary in STB where sediment plume modelling indicates potential impact from the sand mining. We do not expect our fishing operations to be directly affected by mining operations or the physical impact of sediment deposition.
8. Sealord has no further information of possible downstream or ecosystem effects to our fisheries beyond those noted in the 2016 Effects Assessment¹. We note these are manifold and range from direct impacts from heavy metal resuspension to ecosystem impacts from changes to light transmission.
9. Sealord further notes that changes to ocean compositional parameters, climate, and currents from cyclical events (ENSO for example) or climate change make predictions about impact less reliable and hence demand a precautionary approach. Sealord's assessment of the potential impact on our operations depends heavily on the direction of water movement along the coast – any changes to the prevailing boundary current could result in disruption of middle-depth fisheries offshore from the site.

¹ [Impact-Assessment-23-August-2016-2](#)

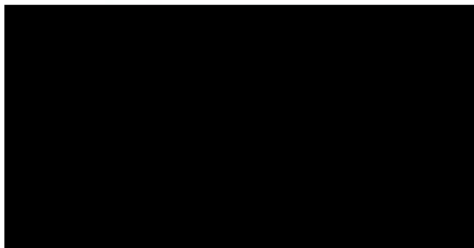
Summary and concluding comments

10. In summary, Sealord supports the wider industry in their opposition of the Application.

11. We would be happy to discuss any aspect of this submission with you further.

Yours faithfully

Sealord Group Ltd



Chief Executive Officer