

Your Comment on the Taranaki VTM Project

Please include all the contact details listed below with your comments.

1. Contact Details	
Please ensure that you have authority to comment on the application on behalf of those named on this form.	
Organisation name (if relevant)	Ngāti Hāua Hapū
First name	████
Last name	██████
Postal address	
Phone number	
Email (a valid email address enables us to communicate efficiently with you)	██

2. We will email you draft conditions of consent for your comment			
☒	I can receive emails and my email address is correct	☐	I cannot receive emails and my postal address is correct

3. Please select the effects (positive or negative) that your comments address:			
☒	Economic Effects	☒	Sedimentation and Optical Water Quality Effects
☒	Effects on Coastal Processes	☒	Benthic Ecology and Primary Productivity Effects
☒	Fished Species	☒	Seabirds
☒	Marine Mammals	☐	Noise Effects
☒	Human Health Effects of the Marine Discharge Activities	☒	Visual, Seascape and Natural Character Effects
☐	Air Quality Effects	☒	Effects on Existing Interests
☐	Other Considerations (please specify): Effects on mana whenua		

Please provide your comments below. You may include additional pages if needed. If you are emailing this form and attaching any supporting documents, please list the names of those files below to help us ensure all materials are received.

Please see attached Ngāti Hāua Hapū feedback, including legal submissions.

Thank you for your comments

COMMENT BY NGĀTI HĀUA WITH RESPECT TO THE TARANAKI VTM APPLICATION
02 October 2025

Ko Tahurangi te waka ha Māui

Māui's waka is Tahurangi

Ko Rangitukutuku te aho

Their fishing line is Rangitukutuku

Ko Pikimairawea te matau

Their hook is Pikimairawea

Ka makaia atu e Māui ka mou ai ko Te Uru a Tonganui

That was flung out into the ocean by Māui and ensnared Te Uru-a-Tonganui

Nō runga i a Hāhā te Whenua te ika ki rō wai

Which sat upon Hāhā te Whenua the colossal fish in the deep that was borne of the seabed

Riakina mai rā utaina ki runga rā

Which was heaved up from out of the dark abyss of the sea

Ko Papatūānuku pāea mai ki uta

And became land that rose up from out of the ocean

Ko te ika nā Māui i kutikuti pekapeka

Land that the Māui clan carved up

I tū mai ai ha mouna nunui ha aotea roroa

And caused the great mountain ranges to rise and spread across the country

I tū mai ai te ika nui a Māui-tikitiki-a-Tarahanga e takoto nei

And brought the North Island into existence

Hei whenua mō te kaupapa tangata

As a home for humankind who emanate from the land

He kaupapa tangata he kaupapa whenua

Land beget humankind, whose existence is contingent upon it

He kaupapa moana he kaupapa whenua e hai!

The land is borne of the sea, it is an extension of the ocean floor, and therefore so is humankind.

1. *Ngāti Hāua is a hapū of the iwi of Ngā Ruahine. Ngāti Hāua oral histories speak of the importance of the ocean and particularly the foreshore and seabed to our existence as people. As coastal peoples who have occupied the areas between the Ōtākeho and Rāoa rivers for centuries we have become heavily reliant on the takutai moana for providing sustenance to our people. This small area of occupation contains 15 onshore rocky reefs and one sandy reef, each of which carry names of their own that reflect important historical events and the food source that is known to dwell there. Each reef is known to be plentiful of particular taonga species which therefore necessitate protection according to our tikanga to ensure the survival of taonga species for future generations. Ngāti Hāua is tasked with the important role of being custodians of our rohe moana, a role we take very seriously. This is evidenced in our current application to the High Court as an applicant for Customary Marine Title (CMT) and Protected Customary Rights (PCR) under the Marine and Coastal Area (Takutai Moana) Act 2011 (MACA) legislation therefore any activities that present a risk to these reefs and their ecosystems will be met with fierce opposition. That said, of course, our interests and duties according to tikanga within our rohe moana do not depend at all on their recognition in te ao Pākehā or by ngā ture o Pākehā.*
2. *Within Ngāti Hāua the word that is typically used for these reefs is “māra” which usually inspires thought of a garden whose soil must be tilled and therefore protected in order to provide a bountiful harvest. The everyday use of this metaphorical language signifies the prominence of these reefs to our hapū as an important food source as well as a nod to the traditional narrative of the land being literally fished up out of the ocean by Māui. This narrative forces one to think of the seabed and the garden bed as one and the same, they are simply extensions of each other.*
3. *It is with this context in mind that Ngāti Hāua vehemently oppose the Trans Tasman Resources Limited (TTR) Taranaki VTM substantive application for seabed mining in its entirety. Activities that involve discharge of sediment, chemicals during the process of iron ore washing or any other substance must be proved to cause absolutely no material harm to the marine environment that we rely so heavily on. The Coastal Plan for Taranaki 2023 identifies some of these Ngāti Hāua reefs as Significant Indigenous Biodiversity Areas, alongside Significant Seabird Areas, High Natural Character Areas and Sites of Significance to Ngāti Hāua. The TTR application has failed to effectively consider effects on our māra and on Ngāti Hāua, and how they will be avoided. Nor has TTR actively engaged and consulted with Ngāti Hāua. Therefore Ngāti Hāua supports the position of the Supreme Court that updated environmental modelling from TTR needs to reflect this and that TTR must provide unequivocal evidence that our māra would not be heavily impacted by a sediment plume or other discharges. From what we can see, the material provided by TTR in support of its application is far from adequate to identify potential effects and its conditions are insufficient to manage them.*
4. *Ngāti Hāua’s concerns are not limited to its māra. Ngāti Hāua has for centuries fished in its rohe moana, and that resource continues to provide a crucial source of kai moana and sustenance for its people. Other species that inhabit or pass through*

Ngāti Hāua's rohe moana, including tohorā/whales and other marine mammals, are taonga and their protection from harm is a matter of utmost cultural and spiritual significance to Ngāti Hāua. Moreover, Ngāti Hāua recognises that the moana is an interconnected whole, and that effects in one spatial location may have consequential effects on other parts of the ecosystem.

- 5. The now long outdated modelling of suspended sediment included with the application materials suggests that large concentrations of suspended sediment will be deposited into the waters and benthic environment of Ngāti Hāua's rohe moana. We do not consider that the information provided adequately identifies the potential effects of these activities on our rohe moana, our kai moana, and our taonga species. We also observe that the now long outdated report on marine mammals provided with the application materials is derived from manifestly inadequate data and its conclusion that the South Taranaki Bight is of low suitability to threatened cetaceans is inconsistent with our oral traditions which recognise the long presence of such species within our waters. We also observe that, to the extent that human activity has harmed the populations of threatened cetaceans in our waters, efforts should be focused on rehabilitating those populations and habitats, not further harming them.*
- 6. We observe that the long outdated report on fisheries provided with the application materials asserts that "the available information describing the extent and magnitude of customary fishing and gathering in the STB is very limited". That, of course, is false. The mana whenua of the South Taranaki Bight understand well their connection to the moana and its use as a source of kai moana. What it demonstrates is that the applicant has not bothered to engage with tangata whenua or mātauranga Māori. If the applicant has not even identified our interests, then there cannot be a sufficient informational basis to be sure that our interests will be protected.*
- 7. The long outdated cultural impact assessment provided with the application materials was prepared by an expert in Ngāi Tahu history and traditions. Ngāti Hāua's view is that any assessment of cultural impacts on the iwi and hapū of the South Taranaki Bight ought to be undertaken by someone with expertise in their history and tikanga. That report concludes that "Ngati Ruannui [sic] hold mana whenua in the coastal area being considered". It is not clear from the report how the author has reached that conclusion, and it largely appears to be an assertion. We agree that Ngāti Ruanui hold mana whenua over part of the large area affected, but it is clear that the interests affected by the proposed activity (and its sediment plume and other consequential environmental effects) extends well beyond the rohe of Ngāti Ruanui and into the rohe moana of other iwi and hapū of the South Taranaki Bight including Ngāti Hāua. The fact that the application materials have wrongly only identified cultural impacts on Ngāti Ruanui, and have not assessed cultural impacts on other iwi and hapū in the area, is a significant deficiency in the application and the proposed conditions.*
- 8. Ngāti Hāua observes that many of the proposed conditions, including in relation to sediment, propose the future developments of models following commencement of the consent. Ngāti Hāua considers that the failure of the applicant to carry out this*

work as part of its application, which it has now been pursuing for more than a decade, to be a material deficiency and a further reason to decline the application.

- 9. Ngāti Hāua also questions the perceived 'benefits' that TTR proposes will be felt within the South Taranaki/Whanganui region. We have heard many times of claimed local economic benefits from extractive activities, but our experience is that they do not materialise. One only needs to look at the economic impact or lack thereof of the oil and gas industry within the South Taranaki region during its operations over the years. Manaia, the closest town to the onshore processing plant for the Kupe gas field, has a median income that is 25% lower than the national average. Therefore the proposed economic benefits described during their establishment were clearly only felt by a very select few and not on a regional basis. Although TTR has stated in their application that approximately 50 total full time equivalent roles will be established during this project, there has been no clear commitment to employing locally, investing locally, or even ensuring that revenue generated by this application will actually flow back into the local economy.*
- 10. Therefore, Ngāti Hāua is clear in its position that the major benefits to TTR's shareholders and minor benefits to the NZ Government in the way of royalties do not in our opinion outweigh the major risks that will be promptly and perpetually felt by South Taranaki communities, including Ngāti Hāua.*
- 11. In respect of a previous application by TTR, the Supreme Court identified significant deficiencies in the assessment of environmental baselines and effects. TTR appears to be relying on largely the same inadequate material, and it has not remedied the informational deficiencies identified by the Court despite having years to do so. The lazy and low cost approach taken by TTR is not only a reason why the application should be declined, but it is reason to doubt the veracity of TTR's claims that it will meet (or will be able to meet) future obligations under its consent or otherwise. It also appears to be reflective of TTR being in a parlous financial position. Ngāti Hāua's view is that TTR has given no confidence that it can, or will, conduct itself responsibly going forward, or that it will do what it says.*
- 12. Should the Taranaki VTM Expert Panel be minded to grant the approval sought in the TTR substantive application, Ngāti Hāua expect a condition, among other protective conditions, be imposed requiring TTR to immediately pay a bond of not less than NZ\$10,000,000 to the New Zealand Government for decommissioning and environmental clean-up. Ngāti Hāua consider this is necessary given the recent experiences with Tamarind and the Tui oil field decommissioning, as well as TTR's claims of the project's benefits and its extensive reliance on conditions as opposed to a proper and prior assessment of environmental impacts.*
- 13. Accompanying this comment is a brief set of legal submissions prepared by our lawyer.*

Whitawhita ana te toi o taku Ahikuku
The fires of occupation burn brightly upon Ahikuku

Kehokeho ana te titiro ki Ōtakeho
As I gaze intently at the mouth of Ōtakeho

Ki te koikoiawa e rere te Tūtuna
The whitebait run and offer a staple food source

Aroaroāmanu Aroaroāika
According to the seasonal changes

Rurutu te tai kahika ki runga Ōtangi'
Nearby is Ōtangiwhenua, the place where the ancient ones stranded

Koia e kīia whakatipuria hei kauwae parāoa! Hi!
From which the saying came: 'Let us grow our people so that they are ready to step out into the world'

Tāhuti atu ki te toka o Marupane
Then I rush hastily to the place where Marupane drowned at sea

He tai wiwini he tai wawana ko Ōkare ki tai!
To the place where Ōkare also met its fate I maintain reverence for the ocean

Whakaherea ngā kātū kai, ki waitokorau
Therefore I feed the spiritual guardians who care for our sealife, to ensure their ongoing protection

Takahia pukutia te kirikiri ki te māra o Tū
I then quietly traverse the shoreline to war's abode

Tāwhiria te kete kōkiritia te tete tara whai e!
Where the basket was swung and the spear was flung

Pikipiki aurere atu rā ki runga te matakūrae
Which causes me to solemnly ascend the steep cliffs onto land

Pupuhi mai te kōmuri hau, ki runga Pukehauangi
To Pukehauangi where the cool wind blows upon me and my thoughts turn to my ancestors

Titiro whakateuru ki Tamatea Kurumai ki Tawhitinui eei!
Then I look Westward to Tamatea Kurumai who came from Tawhitinui, Tawhitiroa, Tawhitipāmao

Hekeheke whakatenuku ki te tauranga o Hounuku
Descend the cliffs to reach the anchorage of Hounuku

Tere māngi ki runga ngaru pupuke ki runga ngaru hihiri
Where the boats are launched upon the correct waves, upon the correct procedure

Ki' hihiri atu rā hō mata riki ki' Ranginui e tū nei!
Cast intently your eyes up to the sky standing above

He whetū kanapa i te rangi he ara ki tai
Look to the stars to guide the way during the night

Ki tai o te moana ki Oranga o tangata
In order to arrive at the fishing grounds where sustenance can be found

He tīoriori ki irirangi he ara ki uta
Then be guided back to shore by the ancient call of our matriarchs

Tōia te waka ki Rungawai, ko Pikiwahine e!
The vessels brought in would be Rungawai and Pikiwahine, richly laden with fish

Whakaherea te tahua ki pātātai
Some of which would be taken to a sacred place and offered to the gods

Ka noho a Rupe i te manea
The place where Rupe remained while trying to locate his sister

Ki' kūmea e Tangaroa-i-te-Rupe-tū
And then he was carried off by Tangaroa to Motutapu

He herenga taniwha, he herenga tangata ei!
The protection of the ocean binds us to our spiritual guardians

LEGAL SUBMISSIONS FOR NGĀTI HĀUA ON TARANAKI VTM APPLICATION

1. In addition to Ngāti Hāua's comment with respect to the application, Ngāti Hāua makes the following brief legal submissions, which are necessarily more limited than would be desirable given resource and time constraints at hand.
2. It is not clear whether Ngāti Hāua will have a further opportunity to make submissions once all of the evidence and comments have been filed. If there is such an opportunity, then it reserves its ability to file further submissions and to otherwise participate in any hearing other processes connected to the processing of the application.

The FTAA scheme

Purpose of the FTAA

3. The purpose of the Fast Track Approvals Act 2024 (**FTAA**) is to facilitate the delivery of infrastructure and development projects with significant regional or national benefits. The question of whether projects have "significant regional or national benefits" must involve a question of *net* benefits. Plainly, a project whose regional or national costs outweigh (or even substantially reduce) its benefits is *not* a project with *significant* regional or national benefits. This net analysis arises in two ways: first, the concept of benefits must itself be a net concept (i.e. the benefits must be set off against the costs of achieving those benefits); and second, those net benefits must be balanced against the adverse impacts of the project in the s 85 weighting test.

Decision-making structure and requirements

4. The decision-making structure in the Fast Track Approvals Act 2024 (**FTAA**) is provided in s 81(2), and it is somewhat inelegant. The Panel must consider certain mandatory matters (in s 81(2)(a) and (b)), comply with sections 82-84, and may decline an application only in accordance with s 85.

Considerations in cl 6(1) of Schedule 10 and interaction with the EEZ Act

5. Section 81(2)(b) directs the Panel to consider the matters in cl 6(1) of Schedule 10. Clause 6(1) of Schedule 10 provides matters the Panel "must take into account" for the purposes of s 81. However, it does not provide an exhaustive list of matters that Panel *may* take into account. Accordingly, Ngāti Hāua submits that the Panel has the power to consider broader matters than those it is required to take into account under cl 6(1) of Schedule 10.
6. Clause 6(1) of Schedule 10 requires the consideration of both the purpose of the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012 (**EEZ Act**) and its decision-making considerations in s 59(2) of the EEZ.
7. The Supreme Court's judgment *Trans-Tasman Resources Ltd v Taranaki-Whanganui Conservation Board* [2021] NZSC 127, [2021] 1 NZLR 801 is controlling on the meaning and effect of the EEZ Act, including as incorporated by reference in the FTAA, and the Supreme Court's identification of deficiencies in the application in that case are also relevant to the present application (including because this application is premised on largely the same material as the application considered by the Court). When considering matters such as ss 10, 59, 61 and 64 of the EEZ Act the Panel is bound by the Supreme Court's judgment.

8. The Supreme Court held that s 10 of the EEZ Act imposed an environmental bottom line that could not be overridden. The purpose of the EEZ Act must inform the approach of the Panel to all substantive matters under FTAA including when taking account of the matters identified in cl 6(1)(b)-(d) of Schedule 10. These bottom lines reflect that activities regulated by the EEZ Act are happening outside New Zealand's territory in an area where New Zealand owes important international obligations relating to environment including under Arts 192 and 193 of the United Nations Convention on the Law of the Sea (implemented by s 11 of the EEZ Act). In the context of the FTAA, such bottom lines cannot be lightly departed from and the Panel must recognise the strength of these protections as crucial in informing the significance of adverse effects for the purpose of the weighing exercise in s 85 of the FTAA.
9. The Panel must also have regard to s 61(2) of the EEZ Act which requires the favouring of caution and environmental protection where the information available is uncertain or inadequate.
10. Section 59 of the EEZ Act makes relevant a range of other important matters, and all of these matters must be considered by the Panel and will bear on the identification *and weighting* of adverse effects. Notably, s 59(2)(h) requires the Panel to have regard to the nature *and effect* of other marine management regimes. This includes both the Resource Management Act 1991 (**RMA**) and the New Zealand Coastal Policy Statement (**NZCPS**). The NZCPS contains important environmental bottom lines (including "avoid" standards) relating to the protection of indigenous biological diversity (Policy 11) and preservation of natural character especially in areas of the coastal environment with outstanding natural character (Policy 13). Objective 3 of the NZCPS expressly incorporates the principles of the Treaty of Waitangi and recognises the importance of the marine environment to tangata whenua. Policy 3 is also significant as it requires a precautionary approach where effects are uncertain, unknown or little understood put potentially significantly adverse.
11. The Supreme Court held that consideration of these matters required express consideration of the objectives and provisions of the RMA and NZCPS in the areas affected by the proposal, and whether the proposal would produce effects within the coastal marine area that were inconsistent with the outcomes ought to be achieved by those regimes. The Court held that these bottom lines need to be *directly confronted* by the decision-maker. It also held that the environmental bottom lines in the NZCPS could not be overridden by other considerations. As with the bottom line in s 10 of the EEZ Act, it must be the case that, even under the FTAA, such bottom lines in the NZCPS cannot be lightly departed from and that strength of these protections must guide the Panel in assessment the significant of adverse effects for the purpose of the weighing exercise in s 85 of the FTAA.
12. The RMA and NZCPS bottom lines are highly relevant to Ngāti Hāua because, although the mining activity will be occurring outside the coastal marine area, the modelling suggests that many of the effects of the sediment discharges will be felt within the coastal marine area. They are also highly relevant because Ngāti Hāua's rohe contains reefs that are identified by the Coastal Plan for Taranaki as areas of Significant Indigenous Biodiversity and Natural Character. Ngāti Hāua considers that any adverse effects on these areas would breach these bottom lines. As recorded in its comment, Ngāti Hāua is concerned by the lack of consideration of effects within its rohe moana.
13. Section 59 is also significant because it expressly recognises "existing interests", which include the interests of tangata whenua, and "other applicable law", which includes tikanga Māori.

Weight of the FTAA purpose already embodied in s 85(3)

14. To the extent cl 6(1) of Schedule 10 refers to the greatest weight being given to consideration of the purpose of the FTAA, Ngāti Hāua submits that those words add little to the test in s 85(3)

and cannot logically be used to neutralise other considerations informing the assessment and significance of adverse effects (as the Court of Appeal warned in *Enterprise Miramar Peninsula Inc v Wellington City Council* [2018] NZCA 541, [2019] 2 NZLR 501). In particular, the purpose of the FTAA (being to facilitate projects with significant regional or national benefits) can have no logical relevance to either the assessment or weighting or adverse impacts.

15. Parliament has embodied the purpose of the FTAA into s 85(3) by providing that applications may only be declined where adverse impacts are sufficiently significant to be out of proportion to the project's regional and national benefits. It follows that a project that has adverse impacts out of proportion to a project's regional and national benefits does not achieve the FTAA's purpose of facilitating projects with "significant regional or national benefits" *because* those adverse impacts offset and outweigh the project's regional and national benefits.
16. Put another way, the direction in cl 6 of Schedule 10 to give the greatest weight to the purpose of the FTAA when considering the various mandatory relevant considerations in cl 6 of Schedule 10 of the FTAA has limited additional relevance when the Panel is considering whether to decline an application for consent because the purpose of the FTAA is already embodied in the s 85(3) test and given greater weight by the framing of the test (i.e. the application will be granted unless there is a basis to decline it).

Section 85(3) and the weighting exercise

17. For the purposes of s 85(3) it is necessary for the Panel to make an assessment of the "adverse impacts of the project" and the "project's regional or national benefits". In this connection, Ngāti Hāua submits:
 - (a) this assessment will involve consideration of impacts that are not readily quantifiable and which may be incommensurate, but nevertheless a rational and principled assessment must be made by the Panel and great care must be taken by the Panel not to underassess the relative significance of adverse impacts simply because they are not readily quantifiable in monetary terms;
 - (b) assessment must be realistic and evidence based, taking precautionary approaches to uncertainty, and also that evidence establishing effects on the environmental and cultural values may look different evidence of financial and other effects;
 - (c) assessment of the nature and significance of adverse effects must have regard to:
 - (i) the environmental bottom lines in the EEZ Act, RMA and NZCPA;
 - (ii) tikanga Māori;
 - (iii) the principles of te Tiriti o Waitangi and the obligations owed by the Crown to Māori;
 - (d) the highly constrained nature of the process under the FTAA means that informational deficiencies should generally be construed against the applicant, especially where the applicant has failed provide relevant evidence of adverse effects or benefits;
 - (e) "regional and national benefits" must be "net" benefits in the sense of involving an assessment of benefits less costs of achieving those benefits, to the extent those costs are not also "adverse effects" (to avoid effects being double counted in the balancing exercise);

- (f) the Panel must account for the possibility that, where adverse impacts have not been assessed or identified by the applicant, and that the significant constraints on participation (even for those who have been invited to participate in this process) will often mean that other parties are not in an effective position to assess those impacts. Nor is it properly or fairly the duty of parties invited to comment to fix deficiencies in the application. This compels a precautionary approach and an effective burden being placed upon the applicant in all respects (such that the absence of information ought to be held against the applicant and its application).
18. Clause 7 of Schedule 10 applies ss 63 to 67 of the EEZ Act directly to the Panel. Notably, s 63(2) gives the Panel a broad and non-exhaustive power to impose conditions if it is minded to not decline the consent, including requirements for the provision of a bond, maintenance of public liability insurance, monitoring, and auditing. Ngāti Hāua submits that all of these conditions ought to be imposed should the Panel proceed to grant the application despite the strong opposition of Ngāti Hāua and many others.
19. Section 64 is also notable for its prohibition on an adaptive management approach.
20. While the FTAA does not contain any reference to te Tiriti o Waitangi its beyond reference to Treaty settlements, that does not obviate the legal relevance of te Tiriti o Waitangi in this case (which is plainly relevant given the effects on Māori interests guaranteed protection under te Tiriti o Waitangi), which the courts have held does not depend upon explicit incorporation by statute. This reflects the ample recognition by the New Zealand appellate courts of the constitutional significance of te Tiriti o Waitangi and tikanga Māori as the first law of New Zealand. Moreover, as noted area, te Tiriti o Waitangi and tikanga Māori has been held to be part of the EEZ Act assessment which this Panel is required to apply. Accordingly, impacts on Māori and tikanga Māori may be both relevant to an assessment of net benefits of the project, and may also be adverse impacts of the project.

TTR's application

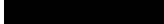
21. It is clear that the Application does not address or adequately address the many and significant deficiencies identified by the Supreme Court in relation to a previous application made by TTR. Rather, TTR has decided to press on with a fundamentally defective and deficient application in the hope that a more favourable legislative regime might save it without TTR investing in the work required to remedy the problems. This is a regrettable and underwhelming approach, indicative of a party this is not taking the important issues connected with its application seriously. It also raises real cause for concern as to TTR's financial position.
22. Fundamental problems identified by the Supreme Court remain. Significant uncertainty exists across the breadth of the application, and in particular with respect to its impacts on the environment. The Panel must have regard to the requirements of the EEZ Act that require caution in the face of uncertainty. Here, the level uncertainty is profound. The application retains the use of pre-commencement type monitoring which effectively excludes informed and prior scrutiny of key effects, and the application of environmental bottom line tests. Overall, the project is fundamentally inconsistent with the environmental bottom lines of environmental protection contained in s 10 of the EEZ Act.
23. Ngāti Hāua's statement identifies a lack of engagement with Ngāti Hāua and its interests within its rohe moana. The applicant has provided a cultural impact assessment that does not assess the impact on Ngāti Hāua and many other iwi and hapū in the South Taranaki bight, and a report on fisheries that acknowledges a lack of information on customary fishing and gathering.
24. Ngāti Hāua's position is that the application should be declined. The adverse impacts of the project—especially when addressed through the lens of caution required by the EEZ Act and

the important environmental bottom lines contained in the EEZ Act and the New Zealand Coastal Policy Statement—outweigh the modest economic benefit the project (likely little more than perhaps a small number of jobs and relatively small royalty payments). Most of the benefits will be offshored to TTR's Australian shareholders and highly paid foreign experts brought in to set up the operation. The costs will be entirely left at home, with tangata whenua and the natural environment.

25. If the Panel were minded to grant the application, which Ngāti Hāua reiterates it strongly opposes, then it is imperative to Ngāti Hāua that robust conditions are imposed and that TTR is required to pay a bond to secure the performance of conditions and to ensure that environmental outcomes promised by the conditions are actually achieved.

Dated 6 October 2025

A large black rectangular redaction box covering the signature area.


Counsel for Ngāti Hāua