

BEFORE THE TARANAKI VTM PROJECT EXPERT PANEL [FTAA-2504-1048]

UNDER THE Fast-Track Approvals Act 2024

IN THE MATTER OF an application by Trans-Tasman Resources Limited
for marine consents

**MEMORANDUM OF COUNSEL FOR
TE RŪNANGA O NGĀTI RUANUI TRUST**

Dated: 18 December 2025

Counsel for Ngāti Ruanui:

J Inns / D Jackson

PO Box 921

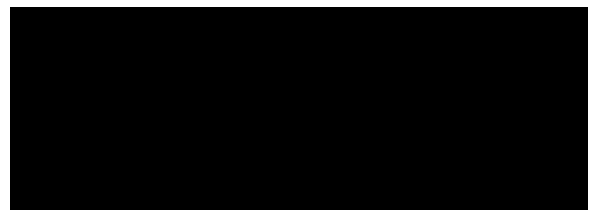
Nelson 7040

T: 03 548 4136

Email: Justine@oceanlaw.co.nz / Daniel@oceanlaw.co.nz

1. This memorandum is filed on behalf of Te Rūnanga o Ngāti Ruanui Trust (**Ngāti Ruanui**) in response to the Request for Information set out in the Expert Panel's Minute 32. Given the time of year and limited time for a response, it has not been possible to present the information below in the form of a witness statement, but such a statement can be provided if the Panel requires.
2. Having reviewed the questions set out in Minute 32, the response of Te Rūnanga o Ngāti Ruanui is:
 - (a) Ngati Ruanui notes the overlap of the Te Tau Hauāuru deepwater rohe moana and statistical area 040 within FMA8, and does not dispute the spatial areas as depicted on the map attached to the Minute.
 - (b) Ngati Ruanui does not specifically identify customary fishing areas. Rather iwi members' customary fishing follows the reef systems of the South Taranaki Bight, and further out into the 12 nautical mile zone, and beyond into the EEZ. Evidence presented by the fishers identified plentiful fisheries in all locations. The access to best timing to utilise these stocks is applied by individual fishers.
 - (c) Ngati Ruanui confirms that customary fishing does occur within and around the application area, including all of statistical area 040. The iwi is concerned that a narrow focus on activities that take place in the application area itself is dangerous, however, as the more important issue is the much wider area that will be impacted by the effects of the project.
 - (d) Ngati Ruanui reaffirms its position that the sediment plume that would be produced by the applicant's activities, to mine the sea floor for minerals, will severely impact iwi and hapū fishing rights and interests, having an intergenerational impact on fishing stocks and survival of fisheries species.

DATED: 18 December 2025



Justine Inns
Counsel for Te Rūnanga o Ngāti Ruanui Trust