

Applicant Responses to Relevant Comments from Parties with Existing Interests on the Taranaki VTM Project

This document contains the key comments from the following parties:

- > Seafood New Zealand;
- > NZ Rock Lobster Industry Council;
- > Whanganui Port Limited Partnership;
- > Ohawe Boating and Angling Club;
- > Opunake Boating & Underwater Club Inc;
- > Wanganui-Manawatu Sea Fishing Club and Patea Districts Boating Club;
- > South Taranaki Underwater Club;
- > Brooks Seafood;
- > Cloudy Bay Clams;
- > Aotearoa Clam Holdings; and
- > Hollings Resource Management.

Comments from Seafood New Zealand

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
1	TTR has consulted with Seafood NZ on proposed conditions, but no agreement was reached.	TTR	n/a	TTR wrote to Talley’s Group CEO Andrew Talley on 12 December 2024 requesting a meeting for a way to work together in the South Taranaki Bight. Andrew Talley passed the request on to Talley’s representative Doug Loder and TTR met with Mr Loder and Talley’s legal representatives on 24 January 2025 at Talley’s head office in Nelson. Mr Loder stated at the meeting that he wanted to be satisfied with a ‘degree of comfort’ that the Taranaki VTM project would not negatively impact its fishery. Mr Loder suggested Talleys would respond with some draft conditions to address their concerns ‘within 6 weeks’. It was agreed that TTR would provide information to Talley’s and Talley’s would respond with some recommendations on how TTR and Talley’s could work together. Talley’s failed to respond with any recommendations, despite TTR sending Talley’s information as requested, access links to Hawera March 2024 MacDiarmid presentation videos and agreed Talleys could engage fisheries expert, Nici Gibbs of Fathom Consulting, who has previously provided expert advice to TTR. On 1 July 2025 TTR received a message from SNZ. TTR responded and met with SNZ Chief Executive Lisa Futschek and Representative Tiff Bock on 11 July 2025 to discuss TTR’s project and SNZ’s submission to the expert panel in preparation for when comments would be invited. SNZ were going to come back to TTR if they required anything further. While no conditions were ever discussed there was intent from both parties to work together to reach agreement. On 29 September 2025 TTR received a message from Lisa Futschek that referred to the July meeting and said:

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				<i>“One of the topics we touched on at that meeting was the potential for agreement on conditions the seafood industry may deem necessary to mitigate possible impacts on the fishery of TTR activities, should the application go through.”</i> TTR and SNZ exchanged emails on 30 September and agreed to meet on 2 October. Lisa Futschek said: <i>“Yes, we’re keen to discuss the potential for agreement on conditions (for referencing in our submission), but like you are very mindful of the deadline next week for comments to the expert panel.”</i> TTR requested a copy of the conditions to assist in being able to make progress in the meeting, given the timeframe, and Tiff Bock sent a copy of the conditions <i>“in good faith”</i> at 1.35pm on 1 October. TTR met with Lisa Futschek and Tiff Bock at 9am on 2 October to discuss the conditions. Late on 3 October, Lisa Futschek emailed SNZ’s full comment to the expert panel and to TTR and said: <i>“Thanks for the conversation yesterday. We value our open communication channel.”</i> In its comment to the expert panel, SNZ states in point 8: <i>“In July 2025 SNZ approached TTR with a view to discussing, and potentially reaching agreement on, the conditions recommended in these comments. To date, no resolution has been reached but SNZ remains open to further discussion.”</i> TTR responded to SNZ on 6 October 2025 thanking them for forwarding the comment but saying that TTR was disappointed to read the comment regarding engagement on conditions, stated it was misleading and a mischaracterisation, and asked them to update the comment to the expert panel and remove point 8. TTR has not heard back from SNZ.
2	Seafood NZ opposes the application due to uncertainty over the adverse effects of fisheries resources, fish habitats and commercial fishing in the submitted application. Seafood NZ proposes recommended conditions, that if adopted, they would not oppose the application.	Planning	Substantive FTA Application: Section 5.13.2 Supplementary Technical Package: 10, 10a,10b,10c, 17, 18, 25	Extensive studies and research have been undertaken at the site identifying the potential adverse effects as described in the substantive application. The necessity of reliance on modelling for certain aspects means the assessments include some uncertainty, but this is to be expected for a project of this scale and location, and does not reduce the reliability of the information. The NIWA technical reports conclude that the project is unlikely to have negative impacts on commercial fishing. Despite the uncertainty, in no instances are the effects predicted to be significant or to a level that cannot be addressed through adequate monitoring and management negating the uncertainty, as is included in the proposed marine consent conditions. Where relevant, TTR has responded to Seafood NZ’s proposed consent conditions below in responses later in these comments.
3	The application includes old out of date data and reporting and does not adequately assess/identify adverse effects on commercial fisheries.	Planning	Substantive FTA Application: Section 5.13.2 Supplementary Technical Package: 10, 10a,10b,10c, 17, 18, 25 Response Evidence:	The evidence submitted with the application has been revised and supplemented since 2016 where necessary. TTR considers that the information submitted in the application and accompanying materials constitutes the best available information, being the information that, in the particular circumstances, is available without unreasonable cost, effort, or time. Dr MacDiarmid comments on the validity of the information referenced in paragraphs 35 to 40 of her evidence. With respect to commercial fishing, the NIWA technical reports have concluded that the effects on commercial fishing will be negligible. As there has been no material change in the commercial fishing

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			Evidence of Dr Alison MacDiarmid (Marine Ecology) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025 – Impact on fishing	environment warranting further consideration since these reports were prepared, the previously prepared reports are still considered relevant. The submissions raised on impacts to fishing have been reviewed in the evidence prepared by A MacDiarmid (2025) who remains of the opinion that, with the inclusion of the marine consent conditions as proposed, the proposal will avoid material harm on fishing.
4	The application focuses on an assessment on the ecological effects on fish but fails to properly assess the impacts on commercial fisheries as an activity.	Ecology, Sedimentation and Coastal Matters	Response Evidence: Evidence of Dr Alison MacDiarmid (Marine Ecology) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025’	Refer to ‘Evidence of Dr Alison MacDiarmid (Marine Ecology) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025’ - Impacts on Fishing
5	The scale of assessment of effects at the STB or FMA areas provided by the application is too broad to adequately assess impacts on commercial fishing.	Ecology, Sedimentation and Coastal Matters		
6	The applications provides insufficient baseline information on commercial fisheries in order to assess potential impacts.	Ecology, Sedimentation and Coastal Matters		
7	The application has not provided sufficient updated information and reporting on commercial fisheries, and the submitted information is out of date.	Ecology, Sedimentation and Coastal Matters		
8	The value of the trawl fishery within the area has increased significantly since 2024 and therefore the submitted assessment is out of date.	Ecology, Sedimentation and Coastal Matters		
9	Set net fishery in the area could be significantly affected by the proposed activity.	Ecology, Sedimentation and Coastal Matters		
10	Jack mackerel mid water trawling in the area could be significantly affected by the proposed activity.	Ecology, Sedimentation and Coastal Matters		
11	Significant rock lobster catch occurs in the wider area.	Ecology, Sedimentation and Coastal Matters	Footnote documents referenced: FN37	This question was addressed fully in Table 4-2, p55, in MacDiarmid et al. (2015) Assessment of spatial scale of marine ecological effects of seabed mining in the South Taranaki Bight: Zooplankton, fish, kai moana, sea birds and marine mammals. NIWA Client Report WLG2015-13, 105 p. Rock lobster is a common and relatively site attached species with an inshore distribution on rocky reefs in the STB that supports a small commercial, recreational, and customary fishery. Given that the main area of distribution is close inshore in naturally turbid water, any displacement of lobsters or decrease in prey abundance or availability due to mining 50 M t per annum should have negligible effects on the state of the stock in area 935 or in CRA9. Populations that occur on offshore reefs such as the North and South Traps could be affected to a minor extent.
12	Significant surf clam fishery in the wider area.	Ecology, Sedimentation and Coastal Matters	N/A	The surf clam fishery in the region occurs off beaches along the Manawatu coastline, close inshore where the suspended sediments from the mining operation will be at very low concentrations and undetectable from the background SSC.
13	Line fishing occurs in the area.	Ecology, Sedimentation and Coastal Matters	Footnote documents referenced: FN96	According to the Fisheries New Zealand data summarised by MacDiarmid et al (2024), no line fishing occurs in the PPA, or the median SSC areas by suspended sediments. The impact of the proposed mining activities on this form of fishing will be negligible.



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14	Other commercial fisheries occur in the area.	Ecology, Sedimentation and Coastal Matters	Footnote documents referenced: FN96	According to the Fisheries New Zealand data summarised by MacDiarmid et al (2024), these other fishing methods rarely if ever occur in the PPA, or the median or 99th percentile SSC areas by suspended sediments. The impact of the proposed mining activities on these forms of fishing will be negligible.
15	Numerous commercial fisheries overlap with the project area or are located in the wider area and may be impacted by the activity.	Planning	Substantive FTA Application: Sections 5.5 - 5.6 & 5.13.2 - 5.13.3 Supplementary Technical Package: 25 Response Evidence: Evidence of Dr Alison MacDiarmid (Marine Ecology) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025 – Impact on fishing	Extensive studies and research have been undertaken at the site identifying the potential impacts of the seabed mining on commercial fisheries and commercially fished species within the South Taranaki Bight and Fisheries Management Area 8. The effects on set net fisheries is expected to be minor, with no significant effects on quota value or fish stock sustainability. The spatial displacement within the “rolling grounds” trawl fishery will have minor effects when taking into account the wide distribution of stocks - meaning likely negligible impacts on quota value or downstream businesses. There is no anticipated spatial overlap within the midwater trawl fishery within the mining area and sediment dispersal is unlikely to affect this fishery as the pelagic species are mobile and can avoid affected areas. The effects of the seabed mining on rock lobster (CRA9 rock lobster fishery) and associating potting predominantly within inshore areas will be negligible with the proposed sediment management as the high wave energy will likely prevent sediment accumulation on reefs. The effects on longlining which occurs sporadically within the STB (minimal overlap within the mining area) and the associated displacement of catch will have negligible effects as target species can migrate out of any areas affected by sediment dispersal. No adverse effects are anticipated to occur to the surf clam fishery as a species that occupies the mobile surf zone environment which is unlikely to be affected by sedimentation from mining operations. As such, the value of the fishery will remain unaffected as the proportion of catch displaced by mining is small relative to the total catch in Fisheries Management Area 8 with widely distributed, mobile species and a dynamic seabed conducive to rapid recovery of mined areas. The submissions raised on impacts to fishing have been reviewed in the evidence prepared by A MacDiarmid (2025) who remains of the opinion that, with the inclusion of the marine consent conditions as proposed, the proposal will avoid material harm on fishing.
16	Applications assesses effects on fish but wrongly conflates that minor/absence of impacts on fish means there will be no impact on commercial fisheries	Ecology, Sedimentation and Coastal Matters	Response Evidence: Evidence of Dr Alison MacDiarmid (Marine Ecology) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025’	Refer to ‘Evidence of Dr Alison MacDiarmid (Marine Ecology) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025’ - Impacts on Fishing

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17	There are significant information gaps and uncertainties in the application on commercial fisheries effects.	Ecology, Sedimentation and Coastal Matters	Supplementary Technical Package: 17	Report 17_NIWA Assessment of the scale of marine effects Report FINAL September 2015.pdf (see Tables 4-1 and 4-2) provides species specific assessments of the impacts of the proposed mining activities on 59 commercial/ recreational/ customary fished species in the STB. With regard to expected cumulative effects, refer to ‘Evidence of Dr Alison MacDiarmid (Marine Ecology) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025’ - Cumulative Effects
18	The dynamic sediment plume will increase uncertainty for commercial fishers over productive areas to fish leading to increased costs.	Planning	Substantive FTA Application: Section 5.13.2 Attachment 1: Proposed Marine Consent Conditions: Condition 86 Supplementary Technical Package: 10, 10a,10b,10c, 17, 18, 25	The effects of the project on commercial fishing are assessed extensively in the NIWA technical reports in the Supplementary Technical Package and in Section 5.13.2 of the FTA Application. The NIWA technical reports conclude that the project is unlikely to have negative impacts on commercial fishing as the spatial displacement will be minor and unlikely to have significant negative impacts on quota value, downstream businesses or fish stock sustainability. Additionally, Condition 86 will ensure ongoing communication with commercial fishers is maintained as to the mining programme for the duration of the project.
19	The reliability of the plume modelling is unclear.	Ecology, Sedimentation and Coastal Matters	Response Evidence: Evidence of Dr Alison MacDiarmid (Marine Ecology) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025’	Refer to ‘Evidence of Dr Alison MacDiarmid (Marine Ecology) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025’ - Reliance on modelled information to assess environmental impact
20	There may be unidentified reefs in the area that would be impacted by the project.	Ecology, Sedimentation and Coastal Matters	Response Evidence: Evidence of Dr Alison MacDiarmid (Marine Ecology) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025’	Refer to ‘Evidence of Dr Alison MacDiarmid (Marine Ecology) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025’ - Impacts on rocky reefs
21	There is considerable uncertainty over the length of time benthic habitats will take to recolonise, if at all	Ecology, Sedimentation and Coastal Matters	Response Evidence: Evidence of Dr Alison MacDiarmid (Marine Ecology) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025’	Refer to ‘Evidence of Dr Alison MacDiarmid (Marine Ecology) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025’ - Impact on and recovery of seafloor communities in the mining area
22	Potential spatial displacement of commercial fisheries has not been adequately assessed by the proposal.	Ecology, Sedimentation and Coastal Matters	Response Evidence: Evidence of Dr Alison MacDiarmid (Marine Ecology) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025’	Refer to ‘Evidence of Dr Alison MacDiarmid (Marine Ecology) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025’ - Impacts on Fishing

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23	Cumulative spatial displacement effects will be high due to other fisheries closures along the coast.	Ecology, Sedimentation and Coastal Matters	Response Evidence: Evidence of Dr Alison MacDiarmid (Marine Ecology) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025'	Refer to 'Evidence of Dr Alison MacDiarmid (Marine Ecology) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025' - Impacts on Fishing
24	Significant changes in bathymetry may prevent trawling in the long term.	Planning	Attachment 1: Proposed Marine Consent Conditions: Condition 86	In relation to the provision of bathymetric survey information on an annual basis, TTR agrees providing regular bathymetry data to fishers operating in the area would be prudent to assist trawlers in avoiding pits and mounds. Condition 86 is amended to include a new sub-clause requiring the consent holder to pre-circulate the most recent Operational Assessment Report to the parties involved in the six-monthly fishing industry meetings. Ergo, the bathymetric survey information will be provided twice each year in advance of the meetings convened in accordance with condition 86.
25	Risk of contaminants from sediment plume impacting actual or perceived seafood products quality	TTR/Siecap	Supplementary Technical Package: 41 Attachment 1: Proposed Marine Consent Conditions: 6, 47, 54 & 57	Mercury and trace metals were addressed in 2014 and 2016 applications in Supplementary Technical Report 41.
26	Commercial fisheries may be impacted by unforeseen events.	Planning	Attachment 1: Proposed Marine Consent Conditions: Conditions 33-34, 40-51, 54-58, 60-71 & 86	Preparation for, response to, and management of unforeseen events at sea will be regulated by the Maritime Transport Act and the Marine Protection Rules which will manage resultant effects on commercial fishers as a result of an unforeseen event. It is noted that the proposed consent conditions include a number of monitoring and management measures (Conditions 33-34, 40-51, 54-58 & 60-71) which will assist to minimise the risk of unforeseen events. Proposed consent Condition 86 will ensure communication protocols with commercial fishers are maintained for the life of the project which will ensure coordinated communication occurs if an unforeseen event occurs.
27	Localised changes in ecological effects may be assessed as acceptable but can have significant impact to commercial fishers due to operation of quotas	Ecology, Sedimentation and Coastal Matters	Response Evidence: Evidence of Dr Alison MacDiarmid (Marine Ecology) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025'	Refer to 'Evidence of Dr Alison MacDiarmid (Marine Ecology) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025' - Impacts on Fishing
28	SNZ recommends a new condition that requires TTR to ensure that adverse effects on fish and shellfish are mitigated and, where practicable, avoided, including but not limited to effects arising from: • The sediment plume; • Underwater noise; • Lighting; and	Ecology, Sedimentation and Coastal Matters / Planning	Substantive FTA Application: Sections 5.5, 5.6 & 5.13 Attachment 1: Proposed Marine Consent Conditions: 54, 103, 104 and 106	This recommendation is not accepted. TTR's comprehensive technical assessments confirm that the project's potential adverse effects on fish and shellfish are negligible to minor. Therefore, the recommended conditions are unnecessary. The monitoring and reporting requirements in the proposed conditions (e.g. condition 54, schedule 6) oblige the consent holder to maintain oversight of environmental effects and require the use of indicators relevant to marine mammals and shellfish.



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	Effects on fish habitats, water quality or primary production. The new condition should also require that once underwater noise has been monitored and verified in accordance with proposed condition 11, the noise profile of the mining operation should be compared to noise frequencies and fish sensitivities of species that are known to occur in the area. If there is a strong overlap between mining noise frequency and fish sensitivities then TTR should be required to instigate mitigation measures to reduce underwater noise production. This condition is consistent with findings of the joint experts in 2017 and 2024.		Response Evidence: Evidence of Alison MacDiarmid on behalf of Trans-Tasman Resources Limited in Response to Comments Received, 13 October 2025	The reporting and review conditions (e.g. conditions 103, 104 and 106) provide a mechanism to address any unforeseen adverse effects that arise for any element (not limited to effects on fish and shellfish).
29	SNZ recommends that, as a condition related to the scope of the PCEMP, TTR should be required to prepare a Fish Monitoring Plan that is developed by a Suitably Qualified and Experienced Person in consultation with persons nominated by SNZ, representatives of the local recreational fishing sector, and relevant non-commercial customary fishing interests	Planning	Substantive FTA Application: Sections 5.13.2 Attachment 1: Proposed Marine Consent Conditions: 47, 48 and 60	This recommendation is not accepted because the matters mentioned are captured by proposed conditions 47, 48 and 60. Fish (commercial fishing, recreational fishing and seafood resources) are provided for in the Pre-Commencement Environmental Monitoring Plan (“PCEMP”), at sub-clauses (k), (n) and (o) of condition 47. Condition 48 requires the PCEMP to be prepared by a Suitably Qualified and Experienced Person. Seafood New Zealand (previously Fisheries Inshore New Zealand) will be represented on the Technical Review Group (“TRG”) (condition 60). That group’s role includes “...<i>review and advise on the appropriateness of the monitoring provided for in the PCEMP and EMMP</i>”. Therefore, the proposed conditions address these recommendations.
30	TTR should be required to familiarise itself with existing commercial fishing activity that may be affected by seabed mining activities, at a scale that is relevant to understanding the potential impacts of the mining on commercial fishing...SNZ therefore recommends that, as a condition related to the scope of the PCEMP, TTR should be required to: - Engage with commercial fishers to understand how they fish in the affected area (including spatial, temporal and economic considerations) and the attributes that make parts of the affected area important for their fishing operations; and - Obtain updated information annually from Fisheries New Zealand on: i. commercial fishing catch and location in the affected area, at the finest scale that can be provided within data confidentiality constraints; and ii. any new regulations affecting commercial fishing in FMA 8.	Planning	Substantive FTA Application: Sections 5.13 and 6.2 Attachment 1: Proposed Marine Consent Conditions: 60 & 86	This recommendation is not accepted because direct engagement with commercial fishers is ensured by Seafood New Zealand’s role on the Technical Review Group (“TRG”) in accordance with condition 60, and the fishing industry relationship arrangements required by condition 86. The TRG’s scope includes reviewing advising on the adequacy of the proposed monitoring and management plans. Its scope also includes providing recommendations on: (condition 60(e)); The environmental management component of the seabed material extraction activities, by an annual data review whereby each year’s monitoring results will be tabulated, reviewed, and compared against the previous monitoring data collected; and (condition 60(f)): Recommend when it considers that a review of the consent conditions in accordance with condition 106 of these consents be instigated for the purpose of dealing with any adverse effects on the environment which may arise from the exercise of these consents and which it is appropriate to deal with at a later stage. Consequently, the information sharing and environmental management outcomes sought by this recommendation will be achieved by direct engagement between the TRG and consent holder, as well as the fisheries stakeholder meetings required by condition 86.
31	As conditions related to the scope of the EMMP, TTR should be required to: Undertake ongoing monitoring of seafood resources under the Fish Monitoring Plan [...] With respect to fish, the EMMP should also include testing of relevant fish species under MPI’s National Chemical Residues Programme or similar;	Planning	Substantive FTA Application: Sections 6.2 & 6.5 Attachment 1: Proposed Marine Consent Conditions: 54, 60 and 86	As discussed in TTR’s responses to Seafood New Zealand’s other similar recommendations, this recommendation is not accepted because the outcomes sought are already provided for by way of: > Seafood New Zealand’s role on the Technical Review Group (condition 60); > The fishing industry relationship arrangements required by condition 86; and > The environmental monitoring framework (e.g. condition 54(k)).



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	- Obtain annual updated information from Fisheries New Zealand on commercial fishing in FMA 8 (i.e., a continuation of the monitoring provision we recommend in relation to the PCEMP). TTR should discuss any significant changes in commercial fishing activity via the fishing industry relationship mechanism (condition 86) in order to assess whether any changes are reasonably attributable to TTR’s activities; and - Within six months of commencement of mining operations, establish a mechanism to enable commercial fishing interests to present any concerns about impacts on their fishing operations to TTR, and for those concerns to be investigated using a transparent process. If the concerns are found to be valid and reasonably attributable to TTR’s activities, remedies or mitigation should be determined by agreement between the parties. This process could be facilitated under the ‘fishing industry relationship’ mechanism referred to in condition 86.			
32	Amend condition 60 and 86 to replace Fisheries Inshore New Zealand with Seafood NZ as Seafood NZ is the merged company.	Planning	Attachment 1: Proposed Marine Consent Conditions: 60 and 86	This recommendation is accepted. References to “Fisheries Inshore New Zealand” in conditions 60 and 86 have been replaced with references to “Seafood New Zealand”.
33	SNZ recommends that proposed condition 86 should be amended to: - Conditions 29, 34, and 38 should require TTR to directly notify Seafood New Zealand or a nominated local commercial fishing representative of the hazards dealt with in each of those conditions; and - Require the meetings to start within six months of consent being granted; - Expand the purpose of the meetings to cover: - Matters relating to pre-commencement monitoring (including design of the Fish Monitoring Plan, monitoring of commercial fishing, and discussion of monitoring results); - Sharing of relevant information and establishing a coordinated approach between the seabed material extraction activities and commercial fishing activities, including communications protocols; and - Developing agreed remedies or mitigation measures if TTR’s activities cause adverse effects on commercially-harvested species, fish habitats, or commercial fishing activities. SNZ recommends that: - Conditions 29, 34, and 38 should require TTR to directly notify Seafood New Zealand or a nominated local commercial fishing representative of the hazards dealt with in each of those conditions; and - TTR should make annual bathymetric survey information available to commercial fishing interests.	Planning	Attachment 1: Proposed Marine Consent Conditions: 29, 34, 28, 60, 86 & 103	Recommendation (i) is agreed. References to “Fisheries Inshore New Zealand” in conditions 60 and 86 have been replaced with references to “Seafood New Zealand”. Recommendation (ii) is agreed. Condition 86 has been amended to require “The first meeting must occur no later than the earlier of either six (6) months after the date on which the consent was granted, or, six (6) months prior to the commencement of the seabed material extraction activities”. TTR responds to recommendation (iii) as below. First dot point (pre-commencement monitoring): this recommendation is not agreed, because Seafood New Zealand’s representation on the TRG in accordance with condition 60 achieves the outcome sought; Second dot point (information sharing): this recommendation is not agreed, because the outcomes sought are already provided for by condition 86, which sets up fishing industry relationship arrangements, including the requirement for the consent holder to “...to establish a coordinated approach between the seabed material extraction activities and commercial fishing activities, including communications protocols”. Third dot point (remediation/mitigation): this recommendation is not agreed, because Seafood New Zealand’s representation on the TRG (per condition 60) includes its participation in the review of the Environmental Monitoring and Management Plan (“EMMP”). The EMMP must “Identify the operational responses to be undertaken if unanticipated adverse effects are identified”, i.e., the outcome sought by this dot point. In relation to condition 29, TTR does not agree with this recommendation because the matters addressed do not present a hazard. This condition requires the backfilling of pit lanes and recording of depth and location of unfilled pits, which information will be included in the Quarterly Operational Report required by condition 103 to be provided to the EPA and to the Kupe Operator.



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				In relation to condition 34, this recommendation is agreed and the condition has been amended to refer to “Seafood New Zealand (or its nominee)”. In relation to condition 38, this recommendation is agreed and the condition has been amended to refer to “Seafood New Zealand (or its nominee)”. In relation to the provision of bathymetric survey information on an annual basis, this recommendation is agreed. Condition 86 is amended to include a new sub-clause requiring the consent holder to pre-circulate the most recent Operational Assessment Report to the parties involved in the six-monthly fishing industry meetings. Ergo, the bathymetric survey information will be provided twice each year in advance of the meetings convened in accordance with condition 86.
34	Conditions should require that all areas of HPSFM that are identified by Fisheries New Zealand in the affected area (i.e., the Sediment Modelled Domain), whether identified before or after the commencement of mining, should be added to the Benthic Monitoring Sites in Schedule 4. We also consider that fish monitoring should be undertaken at the benthic ecology monitoring sites, particularly at those sites that are considered to be HPSFM.	Planning / Ecology, Sedimentation and Coastal Matters	Attachment 1: Proposed Marine Consent Conditions: 47 & 48	This recommendation is not agreed because the proposed consent conditions enable the monitoring of HPSFM sites. Dr MacDiarmid considers that monitoring of fish populations at habitats of particular significance to fisheries management (HPSFM) sites, and at benthic monitoring sites, would be useful if non-destructive methods (e.g., baited and unbaited video monitoring methods or nocturnal swathcam surveys) are used. Conditions 47(j) and (n) require the PCEMP to detail how monitoring of seafood resources and commercial fishing will be undertaken. Condition 48 requires the PCEMP to be independently peer reviewed, then provided to the Technical Review Group (TRG) for confirmation that the monitoring meets the purposes of the PCEMP. Condition 60 nominates Seafood New Zealand’s representation on the TRG. Therefore, the design of monitoring at HPSFM sites is directly in the scope of the PCEMP design, and Seafood NZ will have the ability to consider the Plan’s design in its role on the TRG.
35	Further consideration should be given to measures necessary to ensure benthic recovery occurs, potentially including the payment of a bond by TTR to the EPA to guarantee that necessary research and remedial actions will be undertaken and the intended recovery will be achieved.	Planning	Substantive FTA Application: Sections 5.5.2 and 5.5.4 Attachment 1: Proposed Marine Consent Conditions: 57 & 58 Response Evidence: Evidence of Alison MacDiarmid on behalf of Trans-Tasman Resources Limited in Response to Comments Received, 13 October 2025	This recommendation is not agreed. The benthic environment is expected to recover naturally within month to several years as discussed in Dr MacDiarmid’s evidence. The proposed conditions (e.g., conditions 57 and 58) require this to be actively monitored and reported to the EPA, including a requirement to identify any potential measures to assist recovery if necessary. The level and nature of insurance requirements set by conditions 107 and 108 is appropriate. The purpose of the insurance (to cover costs of environmental restoration and damage to the assets of existing interests) is clearly stated in condition 107.

Comments from NZ Rock Lobster Industry Council

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1	The submitter supports the submission of Seafood NZ on the application.	Planning	n/a	Please refer to response to Seafood NZ submission.

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2	The proposed mining activity has uncertain impacts on fisheries that require the inclusion of conditions to manage. Subject to including suggested conditions, submitter would support the application.	Ecology, Sedimentation and Coastal Matters	Response Evidence: Evidence of Dr Alison MacDiarmid (Marine Ecology) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025'	Refer to 'Evidence of Dr Alison MacDiarmid (Marine Ecology) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025'
3	Insufficient information has been provided to adequately assess effects on the commercial fisheries.	Planning	Substantive FTA Application: Section 5.13.2 Supplementary Technical Package: 10, 10a,10b,10c, 17, 18, 25 Response Evidence: Evidence of Dr Alison MacDiarmid (Marine Ecology) (2025)	The effects of the project on commercial fishing are assessed extensively in the NIWA technical reports in the Supplementary Technical Package and in Section 5.13.2 of the FTA Application. The NIWA technical reports conclude that the project is unlikely to have negative impacts on commercial fishing. Suspended sediment levels may result in short-term displacement of species but is unlikely to result in material harm on species abundance. The project is unlikely to affect the abundance of commercially fished species in the area and unlikely to have any effect on near shore populations of fish and shellfish species. Further, as laid out in the 2025 evidence response of A MacDiarmid, the overall number of fishing events in the project area is very low and will result in a very low scale of potential displacement as a result of any exclusion zones around project vessels. As such, regardless of any perceived undervaluation, the value of the fishery will not be affected as the project is unlikely to have negative effects on commercial fishing.
4	The application rests on the assumption that no significant adverse ecological effects means there will be no adverse effects on commercial fisheries which is not the case. The uncertainty in the provided information means the significance of adverse effects on commercial fisheries cannot be assessed.	Ecology, Sedimentation and Coastal Matters	Response Evidence: Evidence of Dr Alison MacDiarmid (Marine Ecology) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025'	Refer to 'Evidence of Dr Alison MacDiarmid (Marine Ecology) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025'
5	There is uncertainty in the provided sediment plume modelling and data.	Ecology, Sedimentation and Coastal Matters	Response Evidence: Evidence of Dr Alison MacDiarmid (Marine Ecology) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025'	Refer to 'Evidence of Dr Alison MacDiarmid (Marine Ecology) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025'
6	Commercial fisheries will be displaced around the mining site and may be displaced from wider areas impacted by the mining. The application will also result in secondary adverse effects on commercial fisheries.	Planning	Substantive FTA Application: Section 5.13.2 Attachment 1: Proposed Marine Consent Conditions: Condition 86	The effects of the project on commercial fishing are assessed extensively in the NIWA technical reports in the Supplementary Technical Package and in Section 5.13.2 of the FTA Application. The NIWA technical reports conclude that the project is unlikely to have negative impacts on commercial fishing. Suspended sediment levels may result in short-term displacement of species but is unlikely to result in material harm on species abundance. The project is unlikely to affect the abundance of commercially fished species in the area and unlikely to have any effect on near shore populations of fish and shellfish species.



Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
			Supplementary Technical Package: 10, 10a,10b,10c, 17, 18, 25 Response Evidence: Evidence of Dr Alison MacDiarmid (Marine Ecology) (2025)	Further, as laid out in the 2025 evidence response of A MacDiarmid, the overall number of fishing events in the project area is very low and will result in a very low scale of potential displacement as a result of any exclusion zones around project vessels. As such, regardless of any perceived undervaluation, the value of the fishery will not be affected as the project is unlikely to have negative effects on commercial fishing. Additionally, Condition 86 will ensure ongoing communication with commercial fishers is maintained as to the mining programme for the duration of the project.
7	SNZ has recommended conditions to address potential adverse effects on commercial fishing. We support those conditions including: a) requiring TTR to ensure that adverse effects on fish and shellfish are mitigated and, where practicable, avoided, including specific reference to underwater noise; b) conditions requiring pre-commencement monitoring and ongoing monitoring, including the preparation and implementation by TTR of a Fish Monitoring Plan;	Ecology, Sedimentation and Coastal Matters	Substantive FTA Application: Sections 5.5, 5.6 and 5.13 Attachment 1: Proposed Marine Consent Conditions 54, 103-104 and 106	As noted in response to the similar submission point by Seafood New Zealand, this recommendation is not agreed. TTR’s comprehensive technical assessments confirm that the project’s potential adverse effects on fish and shellfish are acceptable. Therefore, the recommended conditions are unnecessary. The monitoring and reporting requirements in the proposed conditions (e.g. condition 54, schedule 6) oblige the consent holder to maintain oversight of environmental effects and require the use of indicators relevant to marine mammals and shellfish. The reporting and review conditions (e.g. conditions 103, 104 and 106) provide a mechanism to address any unforeseen adverse effects that arise for any element (not limited to effects on fish and shellfish).
8	SNZ has recommended conditions to address potential adverse effects on commercial fishing. We support those conditions including: c) a mechanism to enable commercial fishers to raise concerns so that they can be transparently investigated and resolved including the changes in scope of the engagement suggested by SNZ;	Planning	Substantive FTA Application: Sections 5.13 and 6.2 Attachment 1: Proposed Marine Consent Conditions 60 and 86	As noted in response to the similar submission point by Seafood New Zealand, this recommendation is not agreed because direct engagement with commercial fishery stakeholders is ensured by Seafood New Zealand’s role on the Technical Review Group (“TRG”) in accordance with condition 60, and the fishing industry relationship arrangements required by condition 86.
9	SNZ has recommended conditions to address potential adverse effects on commercial fishing. We support those conditions including: d) amending proposed condition 60 to include reference to the NZ Rock Lobster Industry Council	Planning	Substantive FTA Application: Sections 6.2	This recommendation is not agreed. The New Zealand Rock Lobster Industry Council are part of Seafood New Zealand. As discussed in response to the similar submission by Seafood New Zealand, that party will have representation on the Technical Review Group, with the attendant scope for involvement in the review and feedback on management and monitoring documents. The TRG is not intended to provide an individual role for every party as doing so would limit the effectiveness and efficiency (time and cost) of the TRG’s role.
10	SNZ has recommended conditions to address potential adverse effects on commercial fishing. We support those conditions including: e) all areas of HPSFM that are identified by Fisheries New Zealand in the affected area (i.e., the Sediment Modelled Domain), whether identified before or after the commencement of mining, should be added to the Benthic Monitoring Sites in Schedule 4. Fish monitoring should be undertaken at the benthic ecology monitoring sites, particularly at those sites that are considered to be HPSFM;	Ecology, Sedimentation and Coastal Matters	Attachment 1: Proposed Marine Consent Conditions 47-48 and 60	As discussed in relation to the similar recommendation by Seafood New Zealand, this recommendation is not agreed because the proposed consent conditions enable the monitoring of HPSFM sites. Dr MacDiarmid considers that monitoring of fish populations at habitats of particular significance to fisheries management (HPSFM) sites, and at benthic monitoring sites, would be useful if non-destructive methods (e.g., baited and unbaited video monitoring methods or nocturnal swathcam surveys) are used. Conditions 47(j) and (n) require the PCEMP to detail how monitoring of seafood resources and commercial fishing will be undertaken. Condition 48 requires the PCEMP to be independently peer reviewed, then provided to the Technical Review Group (TRG) for confirmation that the monitoring meets the purposes of the PCEMP. Condition 60 nominates Seafood New Zealand’s representation on the TRG.



Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
				Therefore, the design of monitoring at HPSFM sites is directly in the scope of the PCEMP design, and Seafood NZ will have the ability to consider the Plan's design in its role on the TRG.
11	SNZ has recommended conditions to address potential adverse effects on commercial fishing. We support those conditions including: f) further consideration should be given to measures necessary to ensure recovery from impact occurs, potentially including the payment of a bond by TTR to the EPA to guarantee that necessary research and remedial actions will be undertaken and the intended recovery will be achieved	Ecology, Sedimentation and Coastal Matters	Substantive FTA Application: Sections 8.3.19	This recommendation is not agreed. The level and nature of insurance requirements set by conditions 107 and 108 is appropriate. The purpose of the insurance (to cover costs of environmental restoration and damage to the assets of existing interests) is clearly stated in condition 107. Please refer to TTR's responses to similar recommendations by the Department of Conservation, Beach Energy and the Whanganui District Council about insurance.
12	Submitter recommends that TTR pay a bond to the EPA to guarantee remediation.	Legal	N/A	There is no requirement for a bond, given the extent of the insurance cover, the conditions to manage risks, the lack of infrastructure that would need to be decommissioned when mining ends, and the conditions to ensure remediation is achieved (and monitored from an early stage during the course of the mining activity).

Comments from Whanganui Port Limited Partnership

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
1	Submitter has not been consulted with by the applicant.	Planning	Attachment 1: Proposed Marine Consent Condition 85	TTR has undertaken pre-lodgement consultation in accordance with section 29(1)(a) of the FTA and section 39(1)(d) of the EEZ Act under which the Port Company is not considered to be required to be consulted as it did not meet the definition of any parties within section 11(a) – (f) of the FTAA. Acknowledging the requirements in conditions for TTR to <i>‘establish and maintain a geotechnical and environmental monitoring base located in the port of Whanganui’</i> , following the granting of consents TTR would work with the Port and the relevant Councils to upgrade the existing infrastructure and gain any necessary approvals required to authorise such works.
2	Agrees with the evidence and conclusions of Whanganui District Councils submission.	Planning	n/a	Please refer to response to Part 3-1 Whanganui District Council submission.

Comments from Ohawe Boating and Angling Club

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
1	Effects on fish spawning inshore on the 4 mile reef will be greater than assessed due to a lack of tidal movement in the area which cause sediment to smother and suffocate sea life in the area.	Ecology, Sedimentation and Coastal Matters	Footnote documents referenced: FN37	Assessments have been made of the impacts of the mining activities on 20 commercial or recreational fish species and 39 kia moana species or species groups in the STB taking into account known information about their distribution, feeding and spawning, as well as catches. See MacDiarmid et al. (2015). Assessment of the scale of marine ecological effects of seabed mining in the South Taranaki Bight: zooplankton, fish, kai moana, seabirds and marine mammals. NIWA Client Report WLG2015-13, 105 p.

Comments from Opunake Boating & Underwater Club Inc

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
1	There have been no trials or evidence provided as to the size and extent of the expected sediment plume or resultant damage to ecosystems.	Ecology, Sedimentation and Coastal Matters	Footnote Index: FN102	Trials of the appropriate scale to determine effects are not practicable so there is heavy reliance on models. See also MacDiarmid Evidence 2025 – Reliance on modelled information to assess environmental impact Hadfield and Macdonald (2015) states that the plume from the patch source will extend up to 10 km from the batch boundary. For the suspended sediment sources Hadfield and Macdonald (2015) states that mining-derived SSC exceeds background SSC up to 10-20 km from the source. Estimating the size of the plume is subject to change depending on the threshold concentration value used to define the boundary of the plume i.e. a higher threshold concentration value will result in a smaller size while a lower threshold will result in a larger plume.
2	Concern noise and sediment clouds will impact whales in seasonal migration.	Marine Mammals	Substantive FTA Application: Section 5.8 Footnote documents referenced: FN33, FN70 Attachment 1: Proposed Marine Consent Conditions: 10, 36, 47(k),48, 54(l), 55 and 66	TTR carefully assessed the potential impact of both underwater noise and the sediment plume on marine mammals, including humpback whales and Maui dolphins (see Section 5.8 of the Application). While the STB region is an important area for marine mammals, not all of the region is equally important as can be seen from the spatial modelling results (Stephenson et al. 2020; Roberts et al. (2019)). For example, spatial distribution data and habitat suitability modelling confirms that the inshore part of the STB not an important area for humpback whales and Maui dolphins. These models also confirm that the north-eastern and inshore waters of the STB, including the project area, have a very low probability of presence of these species. These models also confirm that the proposed consent location is highly unlikely to be an area of any special biological significance to any marine mammal including humpback whales and blue whales. Given that the best available data indicates that neither humpback whales nor Maui dolphins are likely to be found within the proposed mining area, there are an extremely low risk posed by the operation to these species. Nevertheless, TTR have proposed a range of Consent conditions (including for the control of underwater noise) to provide protection for these species and reduce the already low risk of impacts.
3	The seabed intended to be mined contains a whole ecosystem which will be destroyed by the mining.	Ecology, Sedimentation and Coastal Matters	Response Evidence: Evidence of Dr Alison MacDiarmid (Marine Ecology) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025’	Refer to ‘Evidence of Dr Alison MacDiarmid (Marine Ecology) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025’

Comments from Wanganui-Manawatu Sea Fishing Club and Patea Districts Boating Club

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
1	The Applicant underestimates the extent and variability of offshore recreational use. Recreational fishers report fishing over 50 km offshore	Planning/Ecology	Supplementary Technical Package: 29	The recreational assessment of effects prepared by Rob Greenaway & Associates (2015) has assessed the dispersion of fishing across the TSB and confirmed most of the recreational fishing occurs within 20km offshore. The assessment does acknowledge however that recreational offshore fishing does, less frequently, occur at distances greater than 20km offshore and has considered this in the assessment of effects.

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
2	The club requires updated and locally informed data to be prepared to ensure all significant recreational access points and user groups are properly considered in impact assessment and mitigation planning.	Legal	Substantive FTA Application: Sections 3.4.2 and 5.13.5 Supplementary Technical Package: 29	Neither the FTAA nor the EEZ Act refer to matters of social well-being as a relevant consideration for the application. TTR relies on the evidence of its experts, who consider sufficient information has been obtained to make the necessary assessment. Any effects on recreational users within the Project setting are considered to be very minor with any effects on recreational settings further afield assessed to be no more than minor by Rob Greenaway & Associates (2015), with the exception of moderate effects on the Traps during rare periods of extreme water clarity. The assessment of effects undertaken by Rob Greenaway & Associates (2015) is robust and based on quantitative and qualitative data.
3	The club request the Expert Panel to recognise the social, cultural and economic value of recreational marine activities and ensure that any decision protects conditions necessary for these activities to continue thriving.	Legal	N/A	The definitions of environment and sustainable management under the EEZ Act apply for this application. They do not include considerations of social or cultural well-being (unlike the RMA, which does). There is no evidence that the economic value of recreational marine activity will be affected by the Project.
4	Divers from the 1980s and 1990s recall that the North and South Traps rarely had much silt; instead, the crevices between rocks were filled with clean white sand. More recently in 2008, another diver noted a significant reduction in kelp on the South Trap compared to the that seen in the 1980's and 1990's. lived experience is required to inform impact assessments and monitoring as they are still activity used and valued by recreational fishers and divers.	Ecology, Sedimentation and Coastal Matters	Response Evidence: Evidence of Dr Alison MacDiarmid (Marine Ecology) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025'	Refer to 'Evidence of Dr Alison MacDiarmid (Marine Ecology) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025'
5	Consideration should be given to natural limitations on access to STB for recreational purposes (fishing and diving) recognising this as environmental management and an approach for consideration in effects of the application.	Ecology, Sedimentation and Coastal Matters	N/A	Agree that frequent challenging weather and sea states in the STB limits access by recreational fishers and divers.
6	Modelling inputs and assumptions (swell, current speed and direction, sediment transport, tidal cycles) to be cross checked against verified local accounts to ensure they reflect the real-world conditions	Ecology, Sedimentation and Coastal Matters	Footnote documents referenced: FN21, FN22, FN23	An extensive set of oceanographic and coastal measurements has been collected within the South Taranaki Bight (STB) to support the modelling studies. The results from these field studies are documented in three technical reports: 1. Oceanographic Measurements Data Report 2. Nearshore Optical Water Quality Report 3. Shoreline Monitoring Report Together, these reports present a coherent dataset describing currents, waves, and suspended sediment concentrations in the STB. The measurements have been carefully processed to ensure accuracy and can be used with confidence in the development and validation of numerical models of current flows, wave dynamics, and sediment plume dispersion.



Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
7	We require acknowledgement of the value of recreational knowledge and local experience, which has been excluded from the Applicant's marine mammal assessment, and consider integrating this insight into the evaluation process and potential monitoring conditions.	Marine Mammal	Substantive FTA Application: 3.4.2 and 5.8 Footnote documents referenced: FN47, FN48, FN82 Supplementary Technical Package: 4b Attachment 1: Proposed Marine Consent Conditions 10, 60 and 66	This recommendation is not agreed. Recreational and tourism activities and operators were assessed as discussed in section 3.4.2 of the Substantive Application report. Furthermore, the evidence of Dr Childerhouse notes that there is sufficient data presently available to assess potential impacts on marine mammals and additionally, a significant amount of monitoring work proposed if the application is approved and that work will build on, and complement, the substantial existing data. The parties to be invited to seats on the Technical Review Group (condition 60) will ensure a broad cross-section of local knowledge and experience is brought to bear when the TRG undertake its reviews of the various management plans TTR must prepare, including the Marine Mammal Management Plan required by condition 66. Additionally, condition 10(c) requires that at all times during the operational activities, at least one (1) dedicated and trained marine mammal observer must be present on-board each of the operational vessels (and two observers aboard the IMV). This may provide an opportunity for direct local involvement in the monitoring duties associated with the exercise of the consents. TTRL recognises that the STB is an important hotspot for marine mammal diversity while noting that the use of the STB varies between areas with low or no suitability for marine mammals to areas with high suitability (Stephenson et al. (2020a,b; 2021). Given that some areas of the STB are likely to support marine mammal diversity, it is unsurprising that members of WMSFC and other boating clubs have seen large groups of marine mammals within the region. TTR thanks the WMSFC and other boating clubs for sharing their marine mammal sightings. TTR confirm that they have undertaken a detailed assessment of marine mammal sightings, strandings and other incidents (e.g. bycatch records) within the STB. The results of that analysis are included in Childerhouse (2024, Appendix 2) and include consideration of 2,668 marine mammal sightings available in the Department of Conservation's marine mammal sighting and incident database. These data include all the stranding data that is reported to the Department of Conservation. TTR acknowledge the value of these stranding data to understanding marine mammals within the STB.
8	The efforts made by recreational users to reduce sedimentation at a catchment level for the health of waterways and the marine environment should be considered.	Ecology, Sedimentation and Coastal Matters	Response Evidence: Evidence of Dr Alison MacDiarmid (Marine Ecology) on behalf of Trans-Tasman Resources Limited	Terrestrial sediments in river plumes remains a key threat to marine ecosystems.
9	Lack of clarity regarding which chemical and metals may be discharged into the marine environment.	Operation / Process	Supplementary Technical Package: 41	Mercury and trace metals were addressed in 2014 and 2016 applications in Supplementary Technical Report 41.
10	Nosie from the operations will be either a nuisance, deterrent or unsafe to recreational users in the area including exposure of divers to noise from sonar, construction and mining operations.	Noise	Supplementary Technical Package: 4a	See Humpheson evidence (paragraphs 23-38).Underwater noise from TTR's activities is predicted to be well below recognised thresholds for hearing damage to divers. As long as noise remains below levels associated with discomfort or hearing risk, recreational amenity is generally unaffected.
11	Disruption of offshore areas risk severance of ecological lifeline that sustains inshore fisheries.	Ecology, Sedimentation and Coastal Matters	Footnote Index: FN107, FN37, FN 108, FN116, FN153 Attachment 1: Proposed Marine Consent Conditions: 4 – 5	Environmental risks of sediment discharge were assessed in a number of reports. Aquatic Environmental Sciences Ltd (2016) provided TTR a report titled "Trans-Tasman Resources Ltd consent application: Ecological assessments" that compiled information from several other reports to assess the potential effects of mining operations on the ecological values of the STB.

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
			Additional Reference: Cahoon L (2016) Evidence of Dr. Lawrence Cahoon on behalf of Trans-Tasman Resources Limited, 9 December 2016.	MacDiarmid et al. (2015) in a report titled “Assessment of the scale of marine ecological effects of seabed mining in the South Taranaki Bight, NIWA Client Report WLG20015-13, 105 p.” assessed impacts on zooplankton, fish, kai moana, sea birds and marine mammals. Pinkerton and Gall (2015) in their report titled “Optical effects of proposed iron sand mining in the South Taranaki Bight region. NIWA Client Report No: WLG2015-26, prepared for Trans-Tasman Resources Ltd, 79 p.” described the impact of the mining sediment plume on the underwater light environment while Cahoon et al. (2015) in a report titled “Effects on primary production of proposed iron sand-mining in the South Taranaki Bight” detailed the impact on primary production. The effects of the discharge of sediment on primary production were further elaborated by Dr Cahoon in his evidence of 2016 (Evidence of Dr. Lawrence Cahoon on behalf of Trans-Tasman Resources Limited, 9 December 2016). Dr MacDiarmid In her 2023 evidence (Evidence of Dr Alison MacDiarmid on behalf of Trans Tasman Resources Limited, 19 May 2023) updated the information about the ecological consequential concentrations of suspended sediments on benthic invertebrate fauna. Further, conditions 4 and 5 that will limit mining when pockets of fine sediment are encountered will minimise impacts to the marine environment. This question was addressed fully in Table 4-2, p55, in MacDiarmid et al. (2015) Assessment of spatial scale of marine ecological effects of seabed mining in the South Taranaki Bight: Zooplankton, fish, kai moana, sea birds and marine mammals. NIWA Client Report WLG2015-13, 105 p. Rock lobster is a common and relatively site attached species with an inshore distribution on rocky reefs in the STB that supports a small commercial, recreational, and customary fishery. Given that the main area of distribution is close inshore in naturally turbid water, any displacement of lobsters or decrease in prey abundance or availability due to mining 50 M t per annum should have negligible effects on the state of the stock in area 935 or in CRA9. Populations that occur on offshore reefs such as the North and South Traps could be affected to a minor extent.
12	Even minor changes to water clarity, seabed structure, noise or sediment plumes could disrupt species behaviour and result in habitat displacement having material effects on recreational fisheries. The application has not provided a thorough evaluation of how the seabed mining will affect fished species and recreational fishing to recognise real and lasting impacts on the marine environment and recreational community.	Ecology, Sedimentation and Coastal Matters	Footnote Index: FN107, FN37, FN 108, FN116, FN153 Attachment 1: Proposed Marine Consent Conditions: 4 – 5 Additional Reference: Cahoon L (2016) Evidence of Dr. Lawrence Cahoon on behalf of Trans-Tasman Resources Limited, 9 December 2016.	Environmental risks of sediment discharge were assessed in a number of reports. Aquatic Environmental Sciences Ltd (2016) provided TTR a report titled “Trans-Tasman Resources Ltd consent application: Ecological assessments” that compiled information from several other reports to assess the potential effects of mining operations on the ecological values of the STB. MacDiarmid et al. (2015) in a report titled “Assessment of the scale of marine ecological effects of seabed mining in the South Taranaki Bight, NIWA Client Report WLG20015-13, 105 p.” assessed impacts on zooplankton, fish, kai moana, sea birds and marine mammals. Pinkerton and Gall (2015) in their report titled “Optical effects of proposed iron sand mining in the South Taranaki Bight region. NIWA Client Report No: WLG2015-26, prepared for Trans-Tasman Resources Ltd, 79 p.” described the impact of the mining sediment plume on the underwater light environment while Cahoon et al. (2015) in a report titled “Effects on primary production of proposed iron sand-mining in the South Taranaki Bight” detailed the impact on primary production. The effects of the discharge of sediment on primary production were further elaborated by Dr Cahoon in his evidence of 2016 (Evidence of Dr. Lawrence Cahoon on behalf of Trans-Tasman Resources Limited, 9 December 2016). Dr MacDiarmid In her 2023 evidence (Evidence of Dr Alison MacDiarmid on behalf of Trans Tasman Resources Limited, 19 May 2023) updated the information about the ecological consequential concentrations of suspended sediments on benthic invertebrate fauna. Further, conditions 4 and 5 that will limit mining when pockets of fine sediment are encountered which will minimise impacts to the marine environment.



Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
13	A recent decision from the Minister for Oceans and Fisheries to reduce recreational catch limits for Blue Cod in light of a reduction in stock abundance and members of the fishing club identify the last strong blue cod fishing grounds in a valley northeast of the proposed seabed mining zone feeding on benthic worm beds. As such, the proposal is contrary to the BCO 8 decision and further risks decline of blue cod.	Ecology, Sedimentation and Coastal Matters	Footnote Index: FN37	AM: Table 4.1 in MacDiarmid et al. (2015) has the following entry for blue cod: Assessment of impact: Blue cod is a relatively widespread but site attached (resident) demersal species, with its core area of distribution in the STB lying east and south of the proposed mining area. Blue cod supports a small commercial and a larger recreational fishery in the region. Given that the area potentially impacted by mining 50 M t per annum comprises 0.2% of the area of distribution of blue cod in BCO8, the stock should be affected to a negligible extent. Because blue cod have a broad diet and take advantage of seafloor disturbance to prey upon newly exposed benthic species such as tube worms, brittle stars and small crustaceans, it is possible that mining activities will increase food availability to locally resident fish. MacDiarmid et al. (2015) in a report titled “Assessment of the scale of marine ecological effects of seabed mining in the South Taranaki Bight, NIWA Client Report WLG20015-13, 105 p.” assessed impacts on zooplankton, fish, kai moana, sea birds and marine mammals.
14	Recreational users are concerned about sediment plumes affecting the Pātea inshore reefs, "the traps", and the low-lying reef structures located down current especially the deeper outer reefs with even thin layer of sediment capable of smothering filter-feeding organisms and degrading the reef ecosystem.	Ecology, Sedimentation and Coastal Matters	Response Evidence: Evidence of Dr Alison MacDiarmid (Marine Ecology) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025’	Refer to ‘Evidence of Dr Alison MacDiarmid (Marine Ecology) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025’ - Impacts on benthic invertebrate filter feeders
15	Running a mining operation 24 hours for 7 days a week puts constant pressure on the marine environment.	Ecology, Sedimentation and Coastal Matters	Response Evidence: Evidence of Dr Alison MacDiarmid (Marine Ecology) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025’	Refer to ‘Evidence of Dr Alison MacDiarmid (Marine Ecology) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025’
16	Without a cumulative impact assessment, the long-term risks to fish populations, reefs and coastal ecosystems remain unaddressed.	Ecology, Sedimentation and Coastal Matters	Response Evidence: Evidence of Dr Alison MacDiarmid (Marine Ecology) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025’	Refer to ‘Evidence of Dr Alison MacDiarmid (Marine Ecology) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025’
17	Recreational users input has been excluded from monitoring and advisory structures	Planning	Substantive FTA Application: Sections 3.4.2 and 5.13.5 Attachment 1: Proposed Marine Consent Conditions: Conditions 60, 81 – 82 and 89 Supplementary Technical Package: 29	As per section 3.4.2 of the application, the Project is a very low use recreation setting which is used only rarely for recreational fishing. Any effects on recreational users within the Project setting are considered to be very minor with any effects on recreational settings further afield assessed to be no more than minor by Rob Greenaway & Associates (2015), with the exception of moderate effects on divers in the Traps during rare periods of extreme water clarity. Proposed consent conditions 81 and 82 will enable the establishment of community relationships with recreational users that involves them in an advisory capacity that is proportional to the level of expected effect on recreational users.

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
				Given the low level of effect on recreational users and the purpose of the Technical Review Group to be formed under Condition 60, which 'is to provide <u>technical advice</u> the Consent Holder', it is not deemed appropriate or necessary for recreational users to be included in the formation of the TRG. Proposed consent condition 89 sets out the formation and management of a complaints register and a process for considering and dealing with any complaints.
18	Confirmation is required that New Zealand has sufficient capacity to respond effectively to a major spill.	Unforeseen Events	Attachment 1: Proposed Marine Consent Conditions: Conditions 33-34	The application is not requesting consent under the FTA to authorise any unplanned oil or fuel spills as these activities are regulated by the Maritime Transport Act. The Marine Protection Rules will require oil spill contingency plans to be approved by MNZ for the proposed ships and installations involved in the mining activity. Preparation of these contingency plans will ensure sufficient capacity is available to respond to a major oil spill. Regardless, Conditions 33-34 addresses the potential for oil spills to ensure any spills are managed appropriately.
19	The club mentions the precedent a supportive decision may set for environmental standards and future seabed mining proposals.	Legal	N/A	TTR's application is a specific and unique application. Any future applications must be assessed on their merits, and the present application will not set a precedent.
20	How conditions/management plans address provisioning and planning for any maritime emergency, including assessing capability of existing resources and whether any specific actions necessary to address a shortfall.	Maritime Emergency	Substantive FTA Application: Section 5.14.3 Attachment 1: Proposed Marine Consent Conditions 67	Condition 34 requires the Consent Holder to implement all necessary operational responses, including the measures set out in oil spill contingency plans required under Parts 130A and 131 of the Marine Protection Rules, in the event of a discharge or spill of oil or fuel. Condition 67 requires the preparation of a Collision (Loss of Position) Contingency Management Plan, which requires: > At sub-clause (b): The processes, methods, procedures and responses to be implemented after any unplanned / emergency event that potentially results in mooring failure or loss of position; > At sub-clause (k): The detailed emergency response procedure (including communication requirements and notification periods) addressing incidents such as mooring leg failure, loss of heading control, thruster drive off, and disablement of thruster system. The response must address the risk of collision between the Consent Holder's assets and the Kupe assets to ensure the risk is 'As Low As Reasonably Practicable'. Compliance with these consent conditions will address the matter raised in this comment.
Coastguard Wanganui				
21	Coastguard Whanganui will provide search and rescue assets in the event of a maritime emergency but has not been consulted on the application, and may be assisted by other emergency services.	Unforeseen Events	Attachment 1: Proposed Marine Consent Conditions 90-102	Specific consultation with Coastguard Whanganui was not considered necessary nor required under section 11 of the FTA. All vessels will operate in accordance with Maritime NZ 'Maritime and Marine Protection Rules' and WorkSafe NZ requirements which would manage maritime emergency matters. Conditions 90-102 addresses marine safety matters and will require the design of the IMV as well as operations of the project to accord with best practice as well as undertake detailed investigations and ongoing monitoring that inform the best practice operations.

Comments from South Taranaki Underwater Club

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
1	A full evaluation of conditions is not included here and we look forward to engagement at a future time on these.	Planning	Attachment 1 – Proposed Marine Consent Conditions. Response Evidence: Mitchell, P. and Faithful, L. (2025). Evidence of Phillip Hunter Mitchell and Luke Christopher James Faithfull (Planning) on behalf of Trans Tasman Resources Limited in Response to Comments Received, 13 October 2025, 23-26 p.	TTR notes the Expert Panel would be required to seek comment on draft conditions under section 70 of the FTA before deciding to grant any approval, but there is no requirement under the FTA for TTR to otherwise workshop or engage with submitters regarding condition formation and such a process would be antithetical to the purpose of the FTA with the exception of any discrete specific matters the Expert Panel might identify for resolution between parties. As set out in the Evidence of Dr Mitchell and Mr Faithfull on planning, the proposed conditions are robust, and will ensure that the project operations will not result in any adverse effects that cannot be appropriately avoided, remedied or mitigated to the extent that there will be no material harm.
2	Siecap 3a27 Appendix 19.9 HR Wallingford Tailings Plume Review “Independent review of Plume Modelling August 2014” is omitted from the footnote document, not included in previous submissions to the EPA and should be reviewed by the EPA's independent experts.	Siecap	Attachment 3: Siecap - Taranaki VTM Project Pre-Feasibility Study Offshore Iron Sands Project, March 2025.	The HR Wallingford Report 2014 appended in the Attachment 3 was the initial engagement between TTR and HR Wallingford and was undertaken to review the original NIWA and MTI plume model reports following the rejection of TTR's 2014 EPA EEZ application. The assessments and findings presented in this report were based on HR Wallingford's extensive experience and recognised expertise in dredging plume behaviour and modelling. This document provided early technical review input and has since been superseded by HR Wallingford's subsequent evidence and findings submitted as part of the 2017 EPA hearing and the 2024 application. TTR's current FTA Application references the most up-to-date material.
3	A statutory assessment of the Taranaki Regional Coastal Plan (2013) is missing from Taranaki VTM documentation.	Planning	Substantive FTA Application: Appendix 8.5, Section 4	Appendix 8.5 Section 4 - Regional Coastal Plan for Taranaki - provides a summary and assessment of the proposal against the relevant RCPT provisions.
4	A comment that the Coastal Plan has since been updated with inclusion of “Project Reef” an Ecologically Significant Area is missing within Section 3, 3.2.7.1.	Ecology, Sedimentation and Coastal Processes	Attachment 1: Proposed Marine Consent Conditions: Schedule 2. Response Evidence: McDiarmid, A. (2025). Evidence of Alison MacDiarmid (Marine Ecology) on behalf of Trans Tasman Resources Limited in Response to Comments Received, 13 October 2025	The 2017 DMC was seemingly satisfied that inclusion of ‘The Crack 1’, ‘The Crack 2’ and ‘Project Reef’ as compliance monitoring sites (included in Schedule 2 of the Proposed Conditions) would address their concerns regarding the impact of mining derived sediments.
5	The DMC in point 38 of their decision document indicates that ecologically significant sites such as The Crack and the “Project Reef” will be severely impacted by sediment depositions and light reductions. The conclusions stated that benthic primary production will be significantly reduced over large areas of the Patea Shoals.	Ecology, Sedimentation and Coastal Processes	Response Evidence: McDiarmid, A. (2025). Evidence of Alison MacDiarmid (Marine Ecology) on behalf of Trans Tasman Resources Limited in Response to Comments Received, 13 October 2025,	Refer to ‘Evidence of Dr Alison MacDiarmid (Marine Ecology) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025’ - Impacts on benthic invertebrate filter feeders.

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6	Actions arising from, or agreed to, by parties at Reconvened Hearing Hāwera 13-15 March 2024.	Planning	Supporting Documents: Memorandum of Counsel in Response to Panel Convener Directions 4th August 2025	TTR has commissioned significant additional work to update the application since withdrawal of the 2016 application. These updates are identified in the Memorandum of Counsel in Response to Panel Convener Directions 4th August 2025, and address matters raised by the 2021 Supreme Court decision (where relevant to this FTA application) and additional requirements of the FTA framework.
7	Notes list of points for Panel to consider from Delmore Fast-Track Draft Decision. These are limited to: > “adverse impact” meaning in section85(5) FTAA; > Inconsistency with planning provisions coupled with actual adverse impacts both factors may legitimately contribute to a decision to decline; > Several material impacts sufficiently significant to be out of proportion to he project’s regional benefits;	Legal	Response Submission: Slyfield, M. (2025) Legal Submission of Morgan Syfield on behalf of Trans-Tasman Resources Limited in Response to Comments Received. 13 October 2025.	Refer to Part 1 – Legal Submission. Noting that application has since been withdrawn from the FTA process before a final decision issued.
8	Notes lists of points for Panel to consider from Delmore FTAA draft decision scrutinising gross outputs and advocating for a net assessment (as a gross assessment risks benefits being overstated).	Legal	N/A	The Delmore decision has little, if any, relevance here. it relates to a different type of project (housing), under different legislation (the RMA, under the FTAA), and with a very different environment and benefits.
9	Disagree with TTR comments that the reconvened 2023 EPA Panel requests for information, findings of the Supreme Court and issues in contention “won’t provide as much guidance as others think” – stating this application has not sought to address any lines of inquiry from the DMC. The Underwater Club strongly disagree with TTR’s eponse to the Fast Track Panel Convenor on 4 th August 2025.	Legal	Response Submission: Slyfield, M. (2025) Legal Submission of Morgan Syfield on behalf of Trans-Tasman Resources Limited in Response to Comments Received. 13 October 2025,	Refer to Part 1 – Legal Submission.
10	The proposed consent conditions have not changed since the 2017 Hearing and Reconsideration Hearing and require significant attention.	Planning	TTR FTA: Attachment 1 Proposed Marine Consent Conditions Final Conditions. Response Evidence: Mitchell, P. and Faithful, L. (2025). Evidence of Phillip Hunter Mitchell and Luke Christopher James Faithfull (Planning) on behalf of Trans Tasman Resources Limited in Response to Comments Received, 13 October 2025	This is incorrect. The proposed consent conditions have been updated since the 2017 Hearing and Reconsideration Hearing in response to feedback received from the previous decisions and as updated information and assessments have been incorporated into this current application. As set out in the Evidence of Dr Mitchell and Mr Faithfull on planning, the proposed conditions are robust, and will ensure that the project operations will not result in any adverse effects that cannot be appropriately avoided, remedied or mitigated to the extent that there will be no material harm.
11	STUC attach a guideline to support best practise in dredge plume modelling stating plume modelling needs to engage ecologists from the very beginning of Environmental Impact Assessment to understand spatial distribution and ecological thresholds of sensitive marine habitats and identify relevant cause-effect timescales and pathways. The guideline also recommends a public database and all data to be made available.	Ecology, Sedimentation and Coastal Processes	Response Evidence: Collins, C. (2025). Evidence of Dr Charine Collins on Behalf of Trans-Tasman Resources Limited in Response to Comments Received. 13 October 2025. 4,17 and 44 p.	Refer to Dr Charine Collins Evidence - The sediment plume modelling approach are based on best practices for far-field sediment plume modelling within the computational constraints at the time of development and used the best information available at the time for all the different components of the modelling.
12	No comparative figures or contextual details of dredging operations around the world and their tonnages have been presented in the FastTrack materials (or in past Hearings) by the applicant. As a club we feel this is a critical and material matter that need to be before the FastTrack panel.	Operations/Processes	Attachment 1: Proposed Marine Consent Conditions: Final Condition 52.	While it is acknowledged that comparative data on international dredging tonnages have not been presented in the FTAA materials, it is important to note that dredging is a highly specialised operation, typically designed and executed to meet very specific environmental, geotechnical, and operational objectives. As such, direct comparisons between projects or reported tonnages elsewhere are seldom



Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
			Response Evidence: Thompson, S. (2025). Evidence of Shawn Thompson on Behalf of Trans Tasman Resources Limited in Response to Comments Received, 13 October 2025, 50 p.	meaningful due to the wide variability in context, including seabed material, depth, hydrodynamics, equipment selection, and project purpose. As part of the Prefeasibility Study, the Siecap NZ undertook an exhaustive global review of dredging and seabed excavation methodologies, engaging with international experts and operators. This process evaluated a wide range of established and emerging technologies, vessel types, and sediment handling techniques, ensuring that the selected approach reflects current best practice and is technically and environmentally appropriate for the proposed operation. Given that this work has already been undertaken in depth, it would be useful to understand the intent behind the request for comparative global tonnage data, specifically, what insight or decision-making value is expected to be gained from such information, given the highly case-specific nature of dredging operations. By attempting to compare the operation to large scale dredging operations elsewhere, there is an implication that the full 50 million tonnes of sediment extracted annually will be permanently removed from the seabed. This is incorrect, the operation involves the extraction of approximately 50 million tonnes of seabed material per annum, of which roughly 45 million tonnes of de-ored sediment, material with the valuable mineral VTM concentrate fraction removed, is returned to the same relative location on the seabed. This distinction is fundamental. The operation is therefore not comparable to large-scale dredging or reclamation projects where the entire volume is permanently relocated or disposed of elsewhere. The proposed process maintains the overall mass balance of the seabed system, with only a small proportion of material (the mineral VTM concentrate) being removed from the marine environment. Assertions based solely on gross extraction figures without acknowledging the return of de-ored sediment create a distorted picture of the true scale and nature of the activity. The process has been specifically designed to minimise net seabed disturbance and reduce environmental impact relative to conventional dredging operations.
13	Compares large scale dredging projects and Port Taranaki to proposal.	TTR/Siecap	Response Evidence: Thompson, S. (2025). Evidence of Shawn Thompson on Behalf of Trans Tasman Resources Limited in Response to Comments Received, 13 October 2025, 50 p.	As above. Given that this work has already been undertaken in depth, it would be useful to understand the intent behind the request for comparative global tonnage data, specifically, what insight or decision-making value is expected to be gained from such information, given the highly case-specific nature of dredging operations. By attempting to compare the operation to large scale dredging operations elsewhere, there is an implication that the full 50 million tonnes of sediment extracted annually will be permanently removed from the seabed. This is incorrect, the operation involves the extraction of approximately 50 million tonnes of seabed material per annum, of which roughly 45 million tonnes of de-ored sediment, material with the valuable mineral VTM concentrate fraction removed, is returned to the same relative location on the seabed. This distinction is fundamental. The operation is therefore not comparable to large-scale dredging or reclamation projects where the entire volume is permanently relocated or disposed of elsewhere. The proposed process maintains the overall mass balance of the seabed system, with only a small proportion of material (the mineral VTM concentrate) being removed from the marine environment. Assertions based solely on gross extraction figures without acknowledging the return of de-ored sediment create a distorted picture of the true scale and nature of the activity. The process has been specifically designed to minimise net seabed disturbance and reduce environmental impact relative to conventional dredging operations.

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14	Consideration of Benthic Ecology & Primary Productivity: Pātea Shoals v Aotearoa NZ Morrison Et al. Report (2022).	Ecology, Sedimentation and Coastal Processes	Response Evidence: McDiarmid, A. (2025). Evidence of Alison MacDiarmid (Marine Ecology) on behalf of Trans Tasman Resources Limited in Response to Comments Received, 13 October 2025, 23-25 p.	Refer to ‘Evidence of Dr Alison MacDiarmid (Marine Ecology) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025’- Impacts on rocky reefs.
15	The conditions proffered by TTR during the 2024 hearing, noted that additional conditions would be added to identify rocky reefs near to the mining area. The FastTrack application does not contain such additional conditions, not has any reef survey work been done in the intervening eighteen months.	Ecology, Sedimentation and Coastal Processes.	TTR FTA: Attachment 1 Proposed Marine Consent Conditions: Final Condition 48(g).	Refer to ‘Evidence of Dr Alison MacDiarmid (Marine Ecology) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025’ - Impacts on rocky reefs. Refer to Condition 48 providing multi-beam swath mapping to identify all reef habitat within a 3km distance of the extraction area.
16	K Pratt in her submissions and other communications in the Hearings Process has repeatedly requested the Project’s Reef’s inclusion (as well as ‘The Crack’) suggesting the Decision Making Committee (DMC) look to include it in the conditions (in the Benthic Monitoring Condition’s Schedule)	Ecology, Sedimentation and Coastal Processes.	Attachment 1: Proposed Marine Consent Conditions: Schedule 2. Response Evidence: McDiarmid, A. (2025). Evidence of Alison MacDiarmid (Marine Ecology) on behalf of Trans Tasman Resources Limited in Response to Comments Received, 13 October 2025, 26 p.	The 2017 DMC was seemingly satisfied that inclusion of ‘The Crack 1’, ‘The Crack 2’ and ‘Project Reef’ as compliance monitoring sites (included in Schedule 2 of the Proposed Conditions) would address their concerns regarding the impact of mining derived sediments.
17	Grinding/Beneficiation Process and associated uncertainties.	Operations/Processes	N/A	The concern regarding the grinding circuit producing additional fines is noted, but it’s important to clarify that the grinding circuit represents a controlled and limited part of the overall process, using low-intensity equipment specifically chosen to minimise the generation of fines. The downstream environmental modelling already reflects this operational step. The Vertimills were selected after an extensive evaluation program that compared multiple grinding technologies. TTR worked closely with equipment manufacturers and process specialists to identify a solution that would achieve the necessary liberation of VTM mineral particles while minimising the production of unwanted fines. Unlike conventional high-energy grinding mills, which aggressively fracture material and create large volumes of ultra-fine particles, Vertimills operate under a low-intensity, energy-efficient grinding regime. The vertical design creates a controlled attrition environment, more like polishing than crushing. This ensures that the grind is precise and predictable, producing a tighter particle size distribution and preserving the integrity of the coarser fractions. This gentle, energy-efficient approach is one of the reasons Vertimills have become an industry standard in fine mineral processing, particularly in operations where both product quality and process efficiency are paramount. In the context of TTR’s operation, this translates directly into lower power demand,

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				reduced mechanical wear, and less fine material entering the return stream, all of which contribute to a more sustainable and environmentally responsible processing circuit. Only 20% to 30% of the extracted seabed sediment, now high graded, is directed to the Vertimills for further processing. The balance of the material bypasses the grinding stage entirely. This means that the majority of the mined material is not subjected to size reduction, which inherently limits any potential increase in the proportion of fines generated through the grinding circuit. It is also essential to recognise that the particle size distribution used in NIWA's plume modelling was based on run of mine and post-grinding characteristics. This means that any potential effects from the grinding process on particle size and suspension behaviour have already been accounted for in the environmental dispersion and plume modelling presented in the FTA application.
18	Release of potential trace metals and monitoring	Discharge	Supplementary Technical Report: 41	Mercury and trace metals were addressed in 2014 and 2016 applications in Supplementary Technical Report 41
19	Discharge of Trace Metals	Discharge	Supplementary Technical Report: 41	Mercury and trace metals were addressed in 2014 and 2016 applications in Supplementary Technical Report 41.
20	Schedule 6 'Monitoring of Indicators' does not set out details of monitoring methods.	Planning	Attachment 1: Proposed Marine Consent Conditions: Conditions 47 -48, 54 – 55 & 57	Schedule 6 of the proposed consent conditions simply identifies the relevant indicators to be monitored. Conditions 47 - 48 (Pre-commencement Environmental Monitoring requirements and Plan), 54 (Environmental Monitoring Requirements), 55 (Environmental Management Monitoring Plan) and 57 (Post-Extraction Benthic Recovery Monitoring) set out the details of forming and implementing the monitoring methods for the identified indicators in Schedule 6. The requirements include monitoring of the seafloor sediment quality.
21	Fines	Operations/Processes (Fines)	Supplementary Technical Report: 41	The concern regarding the grinding circuit producing additional fines is noted, but it's important to clarify that the grinding circuit represents a controlled and limited part of the overall process, using low-intensity equipment specifically chosen to minimise the generation of fines. The downstream environmental modelling already reflects this operational step. The Vertimills were selected after an extensive evaluation program that compared multiple grinding technologies. TTR worked closely with equipment manufacturers and process specialists to identify a solution that would achieve the necessary liberation of VTM mineral particles while minimising the production of unwanted fines. Unlike conventional high-energy grinding mills, which aggressively fracture material and create large volumes of ultra-fine particles, Vertimills operate under a low-intensity, energy-efficient grinding regime. The vertical design creates a controlled attrition environment, more like polishing than crushing. This ensures that the grind is precise and predictable, producing a tighter particle size distribution and preserving the integrity of the coarser fractions. This gentle, energy-efficient approach is one of the reasons Vertimills have become an industry standard in fine mineral processing, particularly in operations where both product quality and process efficiency are paramount. In the context of TTR's operation, this translates directly into lower power demand, reduced mechanical wear, and less fine material entering the return stream, all of which contribute to a more sustainable and environmentally responsible processing circuit. Only 20% to 30% of the extracted seabed sediment, now high graded, is directed to the Vertimills for further processing. The balance of the material bypasses the grinding stage entirely. This means that the majority of the mined material is not subjected to size reduction, which inherently limits any potential increase in the proportion of fines generated through the grinding circuit.

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				It is also essential to recognise that the particle size distribution used in NIWA's plume modelling was based on run of mine and post-grinding characteristics. This means that any potential effects from the grinding process on particle size and suspension behaviour have already been accounted for in the environmental dispersion and plume modelling presented in the FTA application. Mercury and trace metals were addressed in 2014 and 2016 applications in Supplementary Technical Report 41. Siecap NZ Ltd
22	Sedimentation and optical quality: "worst case" is not the worst case modelled and STUC/Project Reef have provided the Panel with an extra table that may be useful in understanding the variable time-series applied to the fines in the "worst-case".	Ecology, Sedimentation and Coastal Processes	Response Evidence: McDiarmid, A. (2025). Evidence of Alison MacDiarmid (Marine Ecology) on behalf of Trans Tasman Resources Limited in Response to Comments Received, 13 October 2025, 26 p. 15.	Refer to MacDiarmid Evidence (2025)- The modelling undertaken by Macdonald & Hadfield (2017) ¹¹ in response to a direct request from the DMC at the time, incorporated a "worst case scenario" and sediment related effects have been assessed on that basis, which gives confidence that the assessments are appropriately cautious.
23	The materiality of TTRL's operations in terms of volumes, time scale and modelled localised impacts – the 'duty of care' should be particularly high in the setting of conditions with Woodside's Dredging and Spoil Disposal Management providing guidance, and the minimum standard that should be expected of TTR.	Ecology, Sedimentation and Coastal Processes	Response Evidence: McDiarmid, A. (2025). Evidence of Alison MacDiarmid (Marine Ecology) on behalf of Trans Tasman Resources Limited in Response to Comments Received, 13 October 2025, 26 p. 37. Attachment 1: Proposed Marine Consent Conditions: Final Condition 47, 48b and 55.	Refer to MacDiarmid Evidence (2025). Seasonality has been provided for in the SSC limits identified and to be identified sitting within the Pre-Commencement Monitoring Plan and the Environmental Monitoring and Management Plan. This will enable confirmation of the current understanding of the seasonality and natural variability of environmental parameters that will be monitored during seabed material extraction activities across the three years of pre-commencement and inform limits operationally.
24	Condition 4b, limits discharges to 7,190 tonnes per hour averaged over a monthly period. Generally, applying a time-average such as a month to a data set for the purposes of threshold analysis will result in a smaller zone of effect than if shorter time-averaged days are used. Woodside have determined 'ecological zones' depending on taxa. For South Taranaki the research to enable such ecological zones is yet to be conducted.	Ecology, Sedimentation and Coastal Processes	FTA Application: Section 6.4.4, Table 6.1.	Application in Table 6.1 indicates that SSC will be monitored continuously allowing fine temporal scale determination of effects at specified site
25	Condition needed to monitor the fines erosion/resuspension of fines from the cumulative lengths of pits as well as the cumulative length of mounds.	Ecology, Sedimentation and Coastal Processes	Substantive FTA Application: Table 6.1	The Application in Table 6.1 indicates that SSC will be monitored continuously at specified sites.
26	Information about the mining schedule has been missing – which makes it difficult to assess the finer details behind 'on average five meters' depth for mining. The Callaghan Innovation's document is essential reading for the FastTrack panel and not in the FastTrack documents or Footnote list. Callaghan Innovation 2016 report "Results of Iron-sand Characterisation: "Where is the iron?"	Operations/Processes	Attachment 3: Siecap - Taranaki VTM Project Pre-Feasibility Study Offshore Iron Sands Project, March 2025, Section 5.14. Attachment 3: Siecap - Taranaki VTM Project Pre-Feasibility Study Offshore Iron	The referred report was undertaken by Callaghan Innovation and has been cited as further evidence of missing data. The study tested a cross section of TTR drill hole samples to test the particle sizes and associated geochemistry, for the Run of Mine (ROM) and a low magnetic intensity separation. The testing process does represent the actual ROM used in the project's production schedule. The composite samples are <i>unweighted averages</i> that do not take into account the relative thickness or volume of each drill interval.



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			Sands Project, March 2025, Section 5.14.	The resource model and the mining schedule provides the mining grades and associate volumes. Consequently, the “representative ROM” material used in testing reflects only an indicative average composition, rather than the true weighted average of material expected to be extracted during mining.
27	Conditions related to monitoring and reporting of all potential sources of fines as a precautionary approach and international best practise.	Operations/Processes (Fines)	Attachment 1: Proposed Marine Consent Conditions: Final Condition 54.	The proposed conditions include a requirement under proposed Condition 54 that following the completion of the pre-commencement monitoring required by proposed Conditions 47 and 48 and the review of the SSC Limits required by Condition 51, the Consent Holder must undertake monitoring of suspended sediment concentrations.
28	Assessment of noise effects and sound source levels of IMV and of Willam Fraser dredge vessel are not representative.	Noise	Supplementary Technical Package: 4a. Response Evidence: Humpheson, D (2025). Evidence of Darran Humpheson on behalf of Trans-Tasman Resources Limited in Response to Comments Received, 13 October 2025, 23-38 p.	See Humpheson 2025 evidence in response to comments (paragraph 39 -41). South Taranaki Underwater Club has misunderstood that the 130 dB limit is to be met at 500 metres and not 1 metre. Therefore, their statement is incorrect.
29	Consideration of opportunity costs of the project – whether it will put new regionally or nationally significant infrastructure, like offshore wind, at risk	Economics	Response Evidence: Leung, C. and Huang, T. (2025). Joint Statement of Evidence of Christina Leung and Ting Huang (Economics) on behalf of Trans Tasman Resources Limited in Response to Comments Received, 13 October 2025, 35-53 p.	Refer to Appendix J – NZIER Joint Statement of Evidence for how issues have been addressed around net economic benefits of the project including additional analysis.
30	Multipliers used in the EIA	Economics	Response Evidence: Leung, C. and Huang, T. (2025). Joint Statement of Evidence of Christina Leung and Ting Huang (Economics) on behalf of Trans Tasman Resources Limited in Response to Comments Received, 13 October 2025, 35-53 p.	Refer to Appendix J – NZIER Joint Statement of Evidence for comments on the multiplier approach.
31	Overestimated impact – vanadium revenue should not be included as a revenue source	Economics	Response Evidence: Leung, C. and Huang, T. (2025). Joint Statement of Evidence of Christina Leung and Ting Huang (Economics) on behalf of Trans Tasman Resources Limited in Response to Comments Received, 13 October 2025, 23-37 p.	NZIER’s calculations of benefits from extracted iron ore and V ₂ O ₅ used the projected output and cash flows provided by TTRL. Those inputs from TTRL were informed by the Siecap NZ pre-feasibility study. It is outside of NZIER’s scope and expertise to assess the technical and financial viability of extracting vanadium.



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32	Overestimated impact – no reasonableness testing on the TTRL’s use of IFO380	Economics	Response Evidence: Leung, C. and Huang, T. (2025). Joint Statement of Evidence of Christina Leung and Ting Huang (Economics) on behalf of Trans Tasman Resources Limited in Response to Comments Received, 13 October 2025, 28-30 p.	The regional I-O analysis in NZIER’s EIA only looks at TTRL’s expenditure occurring in New Zealand. Based on the inputs provided by TTRL, IFO380 and workers for fuel bunkering are to be supplied a third-party supplier in New Plymouth. Although IFO is to be imported from Singapore by the supplier, but TTRL’s expenditure on bunkering for the project’s mining operation presents a direct expenditure in New Zealand. Refer to Appendix J – NZIER Joint Statement of Evidence.
33	Reasonableness of spend data from TTR	Economics	Response Evidence: Leung, C. and Huang, T. (2025). Joint Statement of Evidence of Christina Leung and Ting Huang (Economics) on behalf of Trans Tasman Resources Limited in Response to Comments Received, 13 October 2025, 23-27 p.	Refer to Appendix J – NZIER Joint Statement of Evidence.
34	Reasonableness test for TTRL’s inputs	Economics	Response Evidence: Leung, C. and Huang, T. (2025). Joint Statement of Evidence of Christina Leung and Ting Huang (Economics) on behalf of Trans Tasman Resources Limited in Response to Comments Received, 13 October 2025, 23-27 p.	Refer to Appendix J – NZIER Joint Statement of Evidence.
35	Reasonableness test for 100% corporate spend in Taranaki region/Whanganui	Economics	Response Evidence: Leung, C. and Huang, T. (2025). Joint Statement of Evidence of Christina Leung and Ting Huang (Economics) on behalf of Trans Tasman Resources Limited in Response to Comments Received, 13 October 2025, 23-27 p.	Refer to Appendix J – NZIER Joint Statement of Evidence.
36	The National Policy Statement on Renewable Energy Generation is relevant to the proposal and has not been assessed.	Planning	N/A	The application is not for a Renewable Energy Generation related activity and therefore the NPS-REG is not relevant to the application.
37	Calculation of profits and royalties	Economics	Response Evidence: Leung, C. and Huang, T. (2025). Joint Statement of Evidence of Christina Leung and Ting Huang (Economics) on behalf of Trans Tasman Resources Limited in Response to Comments Received, 13 October 2025, 23-30 p.	Noted. NZIER’s analysis of royalties are based on TTRL’s projected output, expenditure and cash flows. We followed the guidance of calculating royalties under the current legislation and applied conservative assumptions on commodity prices. Refer to Appendix J – NZIER Joint Statement of Evidence.



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38	"Agreed List of Issues" 13 March 2024 and K Pratt's suggested amendments (which were largely accepted by TTR)	Legal	N/A	Refer to Legal Submission.

Comments from Brooks Seafood

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1	Claims the application states the project area is barren with no significant attributes, and states the area has a crucial role in the West Coast ecosystem with significant sightings of marine mammals.	Marine Mammals	Footnote documents referenced: FN47, FN82 Substantive FTA Application: Section 5.8	TTRL recognises that the STB is an important hotspot for marine mammal diversity while noting that the use of the STB varies between areas with low or no suitability for marine mammals to areas with high suitability (Stephenson et al. (2020a,b; 2021). Given that some areas of the STB are likely to support marine mammal diversity, it is unsurprising that Brooks Seafood and Awaroa Fisheries personnel have seen large groups of marine mammals within the region. However, TTR have undertaken a thorough review (including supporting some new research) and assessment of marine mammals within the region which is included in the Application (please see Section 5.8 of the Application). Based on this detailed, expert assessment, the data is consistent with and supports the conclusion that there is a low likelihood of marine mammals being present in the proposed TTR consent area and there is nothing to suggest that the mining area is of any significance to any marine mammal species.
2	The application has not proven the activity will not disrupt Taonga species and displace customary fisheries.	Planning	Substantive FTA Application: Sections 5.5-5.8 and 5.13.1 - 5.13.2 Attachment 1: Proposed Marine Consent Conditions: Condition 77 Response Evidence: Evidence of Dr Alison MacDiarmid (Marine Ecology) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025 Evidence of Dr Simon John Childerhouse (Marine Mammals) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025 Evidence of Darran Humpheson (Acoustics) on behalf of Trans-Tasman Resources Limited in response	The effects of the project on the aquatic environment, habitats and species including kaimoana and customary species, are assessed extensively in technical reports in the Supplementary Technical Package and in Section 5.5 to 5.8 of the FTA Application. Based on the NIWA technical reports and proposed active mining area (each detailed extraction area or block is sized at approximately 300m x 300m. The IMV, and SBC, will typically work six of these extraction areas or blocks before having to re-position the anchors and move over to the next planned extraction area) there will not be a large area of displacement of fishers. TTR's experts have reviewed the submissions and remain of the opinion that the marine consent conditions as proposed will avoid, mitigate or remedy any adverse effects so that the proposal will not result in material harm on the marine environment, habitats and species. Condition 77 will require the preparation and implementation of a Kaimoana Monitoring Programme that will assist to manage impacts on customary fishing. The objective of the plan is 'to provide for the monitoring of species important to customary needs, including from customary fishing grounds around the site, of Māori who have a relationship to the site'

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			to comments received 13 October 2025 Evidence of Dr David Thompson (Avifauna) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025	
3	The fast track framework breaches the Treaty of Waitangi and the progress of the application will trigger future Treaty Settlements.	Planning	N/A	TTR acknowledge the position of iwi but is using an approval process available to it under New Zealand law.
4	The application should not be approved without smaller test pilot activities being undertaken first.	Planning	Substantive FTA Application: Sections 4.1 & 8.3.19	TTR have funded and undertake extensive studies and research of the STB and at the proposed mining site identifying the potential adverse effects as described in the substantive application. A comprehensive range of operational, monitoring and management measures are proposed, as identified in the proposed marine consent conditions, to mitigate effects on the marine environment. Therefore, it is considered there is no reason the consent cannot be granted based on adverse effects to the marine environment. As per section 4.1, TTR is seeking a 35-year marine consent term with the actual extraction activity taking place over a 20-year period. The remaining time will be used to complete pre-commencement monitoring and the vessel and machinery set up and commissioning. The proposed marine consents duration of 35 years is considered appropriate as provided for under section 73 of the EEZ Act. TTR considers there are no matters under sections 59 and 61 of the EEZ Act that would require the duration of the consents to be less than the 35 years sought, and there is no justification under section 83 of the FTA for the duration condition to be more onerous.

Comments from Cloudy Bay Clams

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
1	Submitter identifies there are negative effects but makes no specific comment.	Planning	Substantive FTA Application: Section 5 Attachment 1: Proposed Marine Consent Conditions	TTR’s expert advisors have concluded that the effects of the proposal are appropriately provided for through the project design and methodology, and those effects will be appropriately managed through the adoption of the proposed consent conditions provided as Attachment 1 to the TTR Application.

Comments from Aotearoa Clam Holdings

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
1	Submitter identifies there are negative effects but makes no specific comment.	Planning	Substantive FTA Application: Section 5	TTR’s expert advisors have concluded that the effects of the proposal are appropriately provided for through the project design and methodology, and those effects will be appropriately managed through the adoption of the proposed consent conditions provided as Attachment 1 to the TTR Application.



Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
			Attachment 1: Proposed Marine Consent Conditions	

Comments from Hollings Resource Management

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
1	Supports the application as the adverse effects are not significant and the project will have benefits.	n/a	n/a	The submitters support for the application is acknowledged.