

Applicant Responses to Relevant Comments from Others on the Taranaki VTM Project

This document contains the key comments from the following parties:

- > Talley’s Group Ltd;
- > Taranaki Offshore Partnership;
- > Sealord Limited;
- > Parkwind NV; and
- > Mark Bamford

Comments from Talleys Group Ltd

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
1	The application remains based on the same information lodged under previous applications which is out of date.	Planning	Substantive FTA Application: Sections 8.3.13-8.3.14 and 8.2.5	The information requirements for the application are set out in section 43 of the FTA and section 39 of the EEZ Act.
2	There remains an information gap on the impacts of 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’
3	There is considerable uncertainty in the sediment plume modelling and subsequently in the adverse effects of 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’
4	The application has failed to address previously identified information gaps.	Planning	Substantive FTA Application: Sections 1.5.4, 8.3.13-8.3.14 and 8.2.5 Response Legal Submission: Legal submissions on behalf of Trans-Tasman Resources Limited in response to comments received. 13 October 2025	As per section 1.5.4 of the application and addressed in the legal submission on behalf of Trans-Tasman Resources (2025), the relevance of the Supreme Court’s 2021 decision is affected by the statutory framework for the present application which is set by the FTA <i>and not the EEZ Act</i> under which the previous decision was made. The evidence submitted with the application has been revised and supplemented since the information submitted in 2016, on which the Supreme Court 2021 decision was based. 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.

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				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. Extensive studies and research have been undertaken at the site identifying the potential adverse effects as described in the substantive application, and the effects of uncertainty have guided TTR’s approach to monitoring and management. 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. The Supreme Court’s 2021 decision is therefore of limited relevance to the application as per section 8.2.5 of the application.
5	There is the potential for significant environmental impacts which pose a serious risk to the sustainability of the commercial fishing and economic interests of quota holders in the area.	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 Taranaki Offshore Partnership

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1	The Offshore Renewable Energy Bill is currently before parliament.	Planning	N/A	The Offshore Renewable Energy Bill has not yet been passed into legislation and therefore is not a relevant matter of law for the Expert Panel to consider in their decision making.
2	The Project is located within a premier wind resource area in the STB.	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.
3	The discretionary decline test under the FTA must consider economic benefits on a net basis, and must prove the impacts of the project are not “sufficiently significant to be out of proportion” to the benefits. Inconsistency with an EEZ Act provision may be a relevant factor to determining a declination.	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.



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4	The requirement to give weight to the purpose of the FTA does not mean there will not be circumstances where the matters in Schedule 10 Clause 6 Paragraphs (b) - (d) are not sufficient to support declining the application.	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.
5	The proposal is not consistent with the sustainable management purpose of the EEZ Act and will limit the ability to harness the natural wind resource in the STB.	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.
6	The submitter has an existing interest in the STB and therefore the Panel can take into account the effects of the proposal on the natural wind resource and its future uses.	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.
7	Limited weight must be place on the economic evidence provided due to deficiencies in the modelling methodology.	Economic	Response Evidence: 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	Refer to 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
8	The economic evidence overstates the economic benefits of the proposal.	Economic	Response Evidence: 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,	Refer to 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
9	The economic evidence fails to address adverse economic impacts of the Proposal.	Economic	Response Evidence: Joint Statement of Evidence of Christina Leung and Ting Huang (Economics) on behalf of Trans-Tasman Resources Limited in response to	Refer to 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

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			comments received 13 October 2025	
10	The economic evidence submitted with the application is not best available information.	Economic	Response Evidence: 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	Refer to 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
11	The application has not substantiated claims the mining process will have less carbon emissions than traditional land based mining, and the application has not assessed the potential for release of carbon stored in marine sediment.	TTR/Siecap	Footnote index: FN27	This risk of seabed disturbance releasing carbon trapped in sediments back into seawater and into the atmosphere is low in sediments with low organic content. The investigation by Vopel et al. (2013) [Vopel, K., Robertson J., & Wilson P.S. (2013). Iron sand extraction in South Taranaki Bight: effects on seawater trace metal concentrations. AUT Client report: TTRL 20138, 62 p] found low levels of organic matter (<1% dry weight) in sands from the mining area and found no evidence for increases in this measure with sediment depth.
12	There is an opportunity loss in terms of potential for offshore wind to support climate change that will be unable to go ahead if the project is approved.	TTR	N/A	TTR wrote to Peter Spencer of Parkwind and Giacomo Caleffi of TOP on 2 September 2024 (along with other proposed OWE proponents Blue Float, Energy Estate, Ocean Ex Energy, Sumitomo Group and Wind Quarry). The letter said that New Zealand’s interests were best served by TTR working with OWE developers to enable both activities to occur in the South Taranaki Bight and asked for a meeting to discuss. On 27 September 2027, TTR received the identical response from Peter Spencer and Giacomo Caleffi (as well as Nathan Turner of Blue Float and Kosuke Shiraji of Sumitomo). The response declined the meeting based on ‘milestones that need to happen’. Neither JERA nor TOP took the opportunity to discuss how the two sectors could co-exist in the South Taranaki Bight. The OWE companies have shown no intent or interest to engage with TTR or to discuss how both could operate in the South Taranaki Bight in the best interests of New Zealand. TTR said in its letter that it would require good co-operation and communication. TTR has worked positively and met with officials at the Ministry of Business Innovation & Employment (MBIE) on plans to establish an OWE regulatory regime.
13	The Government Policy identified by the application should not be called government policy.	Planning	Substantive FTA Application: Section 8 Appendix 8: Statutory Assessment Section Appendices	TTR considers the documents listed in the executive summary of the substantive application identify the potential economic value of extraction of mineral resources such as those found in the STB, and therefore are relevant when considering the economic effects assessment provided with the application. TTR notes that a complete assessment of all relevant statutory legislation and maritime management regimes has been undertaken under Section 8 and Appendix 8, and the application has been found to be consistent or not inconsistent with this legislation. As is standard practice, TTR has not considered activities in the surrounding area that would require, but do not have, marine consent as such activities do not form part of the existing environment.
14	The proposal has understated impacts on seabed morphology which may have significant impacts on future uses in the area.	Ecology, Sedimentation and Coastal Matters	Response Evidence: Refer to ‘Evidence of Dr Iain Thomas MacDonald on behalf of Trans-	Refer to ‘Evidence of Dr Iain Thomas MacDonald on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025’



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			Tasman Resources Limited in response to comments received 13 October 2025'	
15	There is considerable uncertainty in the geographical extent of the impacts of the proposal.	Ecology, Sedimentation and Coastal Matters	Response Evidence: Refer to 'Evidence of Dr Iain Thomas MacDonald on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025'	Refer to 'Evidence of Dr Iain Thomas MacDonald on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025'
16	NIWA modelling of pit infilling and mound deflation contains a number of inaccuracies.	Ecology, Sedimentation and Coastal Matters	Response Evidence: Refer to 'Evidence of Dr Iain Thomas MacDonald on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025'	Refer to 'Evidence of Dr Iain Thomas MacDonald on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025'
17	The applications predictions with regard to seabed morphology are not consistent with long-term data and natural remediation of the pits and mounds created by the proposal will take significantly longer to occur than claimed by the proposal impacting future land uses.	Ecology, Sedimentation and Coastal Matters	Response Evidence: Refer to 'Evidence of Dr Iain Thomas MacDonald on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025'	Refer to 'Evidence of Dr Iain Thomas MacDonald on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025'
18	The application has failed to assess the effects on local waves and currents sufficiently, and there is the risk of potential significant impacts on navigational safety.	Ecology, Sedimentation and Coastal Matters	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
19	The project will have direct impacts in a much broader area than the Mining Area.	Ecology, Sedimentation and Coastal Matters	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
20	The effects on seabed morphology and geotechnical characteristics will be long lasting and potentially "legacy effects".	Ecology, Sedimentation and Coastal Matters	Response Evidence: Refer to 'Evidence of Dr Iain Thomas MacDonald on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025'	Refer to 'Evidence of Dr Iain Thomas MacDonald on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025'
21	The application does not provide best available information on the potential impacts on future offshore wind development.	TTR/Siecap	Supplementary Technical Report: 32	OCEL concludes: The presence or otherwise of the tailings and their potentially loose nature doesn't change anything or have any significant implications for any future deployment and founding of mobile jack-up drill rig platforms on the seabed. The spudcans will sink further into the seabed than for the untouched seabed case before they attain the ultimate bearing capacity resistance required but this is not of significance given that jack-ups are set up to recover spudcans that have sunk well into the seabed.

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				Seabed mining and offshore wind energy (OWE) can potentially co-exist in the South Taranaki Bight as it's a very large area (36,000km2) with potential for economic mineral deposits confined to certain geological terranes and localities confined to a few 1,000km2. However, OWE cannot occur simultaneously with seabed mining in exactly the same area, but OWE could be established on areas previously mined and rehabilitated immediately following mineral recovery (refer 45.3 above). TTR's independent studies (45.3) suggest that it would take a relatively short time for the seabed to settle after mining and therefore will not result in any significant delays or barriers to OWE. In contrast, more permanent interventions in the seabed such as concrete tower foundation structures and seabed cable infrastructure would impact the viability of seabed mining, even after OWE is decommissioned. The geological substate will require massive steel and concrete foundations, along with stabilising fluids, implanted deep into the seafloor (much deeper than the on average 5 metres of mining disturbance) to support the 300m towers and generating equipment. These permanent features along the networking of interconnecting cables draped on the seafloor, will never be recovered or allow any rehabilitation of benthic communities or the marine ecology in the area. OWE once approved effectively sterilises that location for any future seabed mining. TTR has no objection to OWE in the area however this cannot be undertaken on, or immediately adjacent to, active exploration and mining mineral permits and there would be work done to establish the size of any “buffer” zones. That work would need to involve consultation with other interests and regulators, notably Maritime NZ in relation to maintaining safe operating vessels, shipping and service routes. Selection of areas for OWE site selection, feasibility studies and operations, including infrastructure and transmission cable corridors need to be accompanied by an assessment of the potential impacts on existing activities and potential other interests in the area including the presence, or otherwise, of seabed mineral deposits and their value. Such assessment of OWE need to include a comparative economic impact assessment and cost benefit analysis of OWE compared to other uses including seabed mining, fisheries, shipping lanes and oil and gas. OWE economics and GDP benefits claimed are far exceeded by several orders of magnitude by seabed mining of VTM concentrates along the West Coast of the North Island (ref to TTR NZIER Report and MBIE Ministerial Briefing Paper to Minister of Resources - 23 November 2023). TTR has established rights in the STB. The company has been operating in the STB since 2008, invested >\$88 million in mineral exploration, resource development, marine research and environmental studies, has exploration and mining permits granted by the Crown and invested considerable resources in engineering solutions and feasibility studies, underpinned by economic studies to establish a new export

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				industry with significant regional and national benefits and intends to maintain these rights on behalf of its investors. TTR has written to all the OWE potential developers and offered to engage with them on addressing the issues with the two industries working together and co-existing in the STB. These overtures have been rebuffed to date OWE interests. TTR has undertaken extensive marine research and drilled 1,000's of drill holes in the STB that can be shared, by agreement, with OWE that address the marine ecology, seabed strata and substrate and the depth of the supers saturated fluidised black sands and their location. OWE interests need to explore their options, do the necessary data gathering and meaningful research, effects studies, engage with existing interests and stakeholders in the area. With consultation, TTR believes both activities, OWE and mineral recovery, can co-exist in the STB with sensible consultation and co-operation and reference to the facts of the proposals and activities contemplated or existing.
22	TOP considers the following changes to TTRL's proposed conditions of consent might assist with reducing some of the opportunity cost impact of the Proposal outlined above... -Lapse date: Reduce the 10-year lapse date sought by TTRL to two years. -Project duration and area: Add conditions that explicitly confine the scope of the activity to the extent that TTRL has suggested in its Application, but not reflected in its proposed conditions. The conditions would confine the mining activity to a 20 year period and a 66 km2 area of the STB defined accurately by coordinates.	Planning	Substantive FTA Application: Section 2.1 Attachment 1: Proposed Marine Consent Conditions Schedule 1 - 5	This recommendation is not agreed. In relation to the consent lapse term, section 85(1) of the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012 states a 5-year lapse term as a default, as follows: 85 Lapsing of consent if not exercised <i>(1) A marine consent lapses on the date specified in the consent or, if no date is specified, 5 years after the date of commencement of the consent unless, before the consent lapses,—</i> The consent term TTR is seeking is necessary to provide for the pre-commencement work, commissioning of vessels, the 20 year mining life and the 5 year post-mining requirements, and provides some allowance for unexpected delays during that period. The project area is confined to the extent that is defined by the coordinates detailed in schedule 1 to the proposed conditions. The IMV mooring area is defined by the coordinates stated in proposed condition 37 and as shown in Schedule 5 to the proposed conditions. A new consent would be required to mine or moor beyond the areas specified in those schedules.
Evidence of J Perry for TOP				

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23	TTRL's proposed conditions associated with the existing Kupe Petroleum Mining Licence #38146 operator (Kupe Operator) could be amended to apply to any holder of Offshore Renewable Energy feasibility and commercial permits in the vicinity of the Proposal. However, the Kupe operations are limited to a small amount of seabed infrastructure and a small amount of vessel operations, compared to offshore wind. The potential location of offshore wind assets on three boundaries of the Proposal area also introduces significantly different navigation and safety risk considerations compared to the Kupe assets. As such, conditions required to mitigate impacts of the Proposal [on] offshore wind would be considerably more onerous than those proposed for the Kupe Operator.	Planning	N/A	This recommendation is not agreed. The allocation of coastal space under the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012 is provided for on a first in, first served basis. TTR is not obliged to confine its application on the basis that other parties may lodge applications in the future. Seabed mining and offshore wind energy can potentially co-exist in the South Taranaki Bight as it is a very large area (36,000km²) with potential for economic mineral deposits confined to certain geological terranes and localities confined to a few 1,000km². However, offshore wind energy cannot occur simultaneously with seabed mining in exactly the same area, but offshore wind energy could be established on areas previously mined and rehabilitated immediately following mineral recovery. TTR's independent studies suggest that it would take a relatively short time for the seabed to settle after mining and therefore will not result in any significant delays or barriers to offshore wind energy. In contrast, more permanent interventions in the seabed such as concrete tower foundation structures and seabed cable infrastructure associated with offshore wind energy development would impact the viability of seabed mining, even after wind energy assets are decommissioned. Offshore wind energy development would require massive steel and concrete foundations, along with stabilising fluids, implanted deep into the seafloor (much deeper than the on average 5 metres of mining disturbance) to support the 300m-tall towers and generating equipment. Compared to the temporary effects of seabed mining, these permanent features of offshore wind energy development, along the network of interconnecting cables draped on the seafloor, will never be recovered or allow any rehabilitation of benthic communities or the marine ecology in the area. Therefore, once approved, offshore wind energy effectively sterilises that location from future seabed mining. TTR has no objection to offshore wind energy in the area. However, this cannot be undertaken on, or immediately adjacent to, active exploration and mining mineral permits and work would be required to establish the size of any "buffer" zones. That work would need to involve consultation with other interests and regulators, notably Maritime New Zealand in relation to maintaining safe operating vessels, shipping and service routes. Selection of areas for offshore wind energy site selection, feasibility studies and operations, including infrastructure and transmission cable corridors need to be accompanied by an assessment of the potential impacts on existing activities and potential other interests in the area including the presence, or otherwise, of seabed mineral deposits and their value. Such assessments of offshore wind energy need to include a comparative economic impact assessment and cost benefit analysis of offshore wind energy compared to other uses including seabed mining, fisheries, shipping lanes and oil and gas. Offshore wind energy economics and GDP benefits claimed are far exceeded by several orders of magnitude by seabed mining of VTM concentrates along the West Coast of the North Island (refer for example to TTR's NZIER Report and MBIE Ministerial Briefing Paper to Minister of Resources - 23 November 2023). TTR has established rights in the STB. The company has been operating in the STB since 2008, invested >\$88 million in mineral exploration, resource development, marine research and environmental studies,



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				has exploration and mining permits granted by the Crown and invested considerable resources in engineering solutions and feasibility studies, underpinned by economic studies to establish a new export industry with significant regional and national benefits and intends to maintain these rights on behalf of its investors. TTR has written to all the potential offshore wind energy developers and offered to engage with them on addressing the issues with the two industries working together and co-existing in the STB. These overtures have been rebuffed to date by offshore wind energy interests. TTR has undertaken extensive marine research and drilled thousands of drill holes in the STB that address the marine ecology, seabed strata and substrate and the depth of the supersaturated fluidised black sands and their location. These can be shared, by agreement, with that can be shared, by agreement, with offshore wind energy. Offshore wind energy interests need to explore their options, do the necessary data gathering and meaningful research, effects studies, engage with existing interests and stakeholders in the area. With consultation, TTR believes offshore wind energy and mineral recovery can co-exist in the STB with sensible consultation and co-operation and reference to the facts of the proposals and activities contemplated or existing.
Evidence of R King for TOP				
24	Condition 92 should be amended to require: 73.1 A baseline geotechnical report for the entire Proposal area and adjacent areas likely to be impacted by pit/mound migration to be completed prior to any mining commencing. 73.2 A minimum number of tests per depth of placed material e.g. at 0, 5, 10 meters below seabed level. 73.3 A minimum density of tests e.g. one per 300 m x 300 m block. 73.4 A minimum depth of cone penetrometer testing. 73.5 Requirements for when cone penetrometer vs shear strength data needs to be collected, and how the shear strength value is measured. 73.6 A bathymetry survey, along with a record of mound and pit migration over the most recent year and comparison to mound and pit movements to date. 73.7 Pit infilling rates and mound dispersion rates. 73.8 Annual testing including previously reported areas, not just the most recent year, and reporting on any further changes to geotechnical characteristics or bathymetry.		Substantive FTA Application: Section 5.4.1 and 5.4.2.4 Attachment 1: Proposed Marine Consent Conditions 87-92 Supplementary Technical Package: 32	This recommendation is not agreed. The geotechnical investigations undertaken by TTR were designed solely to support the company's proposed seabed extraction activity, not to inform or facilitate the development of offshore wind farms. The investigations were intended to provide a geotechnical understanding of the seabed behaviour relevant to the mining operations — specifically, to determine the geotechnical response of the seabed materials, the angle of repose for the active mining face, and the stability of redeposited sediments following extraction. The objective of TTR's geotechnical work was to characterise how the seabed material would behave during excavation, transport, and redeposition — parameters that are directly relevant to the safe and efficient operation of the seabed mining system, not to the foundation design or loading characteristics of wind turbine structures. In contrast, the geotechnical review provided by Mr King on behalf of the Taranaki Offshore Partnership assesses the suitability of the area for potential offshore wind farm (OWF) development. This is a separate and hypothetical proposal that, at this stage, has not undertaken any site-specific investigations, nor sought marine consents or approvals under the relevant legislation. Mr King's recommendation that TTR undertake further geotechnical drilling or cone penetration testing across the mining area reflects the requirements for OWF design and feasibility assessment — not for seabed extraction. TTR's data and sampling programme were entirely appropriate for the nature and scale of the proposed extraction activity, and consistent with the requirements of the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012 for mining consents. Accordingly, it is important to distinguish that:

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	73.9 The geotechnical report should be provided and updated on request of any party with an exploration/mining permit or offshore renewable energy feasibility/commercial permit, not just the Kupe operator. 73.10 The geotechnical report and testing should be undertaken by a suitably qualified and experienced independent expert.			> TTR’s geotechnical studies were purpose-built to support a mining activity and associated environmental and operational assessments; > They were not designed or required to provide baseline information for unrelated offshore infrastructure such as wind turbines; and > The suggestion that TTR undertake geotechnical investigations to support a proposal that has no defined design, no site investigations, and no approvals extends well beyond the scope and intent of TTR’s current application. OCEL Consultants NZ Limited (OCEL) (Supplementary Technical Report 32), in conjunction with NZ Diving and Salvage Limited (NZDS) has undertaken a total of 5 geotechnical investigations and founding evaluations for jack-up drill rig deployments off the West Coast of the North Island of NZ including liquefaction potential [section 7]. OCEL concludes: The presence or otherwise of the tailings and their potentially loose nature doesn’t change anything or have any significant implications for any future deployment and founding of mobile jack-up drill rig platforms on the seabed. The spudcans will sink further into the seabed than for the untouched seabed case before they attain the ultimate bearing capacity resistance required but this is not of significance given that jack-ups are set up to recover spudcans that have sunk well into the seabed. Seabed mining and offshore wind energy (OWE) can potentially co-exist in the South Taranaki Bight as it’s a very large area (36,000km²) with potential for economic mineral deposits confined to certain geological terranes and localities confined to a few 1,000km². However, OWE cannot occur simultaneously with seabed mining in exactly the same area, but OWE could be established on areas previously mined and rehabilitated immediately following mineral recovery (refer to Comment 3 - below). TTR’s independent studies (Comment 3 - below) suggest that it would take a relatively short time for the seabed to settle after mining and therefore will not result in any significant delays or barriers to OWE. In contrast, more permanent interventions in the seabed such as concrete tower foundation structures and seabed cable infrastructure would impact the viability of seabed mining, even after OWE is decommissioned. The geological substrate will require massive steel and concrete foundations, along with stabilising fluids, implanted deep into the seafloor (much deeper than the on average 5 metres of mining disturbance) to support the 300m towers and generating equipment. These permanent features along the networking of interconnecting cables draped on the seafloor, will never be recovered or allow any rehabilitation of benthic communities or the marine ecology in the area. OWE once approved effectively sterilises that location for any future seabed mining. TTR has no objection to OWE in the area however this cannot be undertaken on, or immediately adjacent to, active exploration and mining mineral permits and there would be work done to establish the size of any “buffer” zones. That work would need to involve consultation with other interests and regulators, notably Maritime NZ in relation to maintaining safe operating vessels, shipping and service routes.

Comments from Sealord Limited

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1	Supports the submissions from Seafood NZ and Te Ohu Kaimoana on the application.	n/a	n/a	Refer to applicant's responses in Part 3-5 Seafood NZ and Part 3-2 Te Ohu Kaimoana.
2	Does not support the project.	n/a	n/a	The submitters opposition is acknowledged.
3	Potential fishers impacts may affect the whole of ECSI offshore fishing operations.	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 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. Additionally, proposed Condition 86 will provide communication with commercial fishers as to the mining programme well in advance.
4	Impacts of downstream and ecosystem effects include direct impacts and ecosystem impacts.	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) 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	As per response to Sealord comments, the NIWA technical reports conclude that the project is unlikely to have negative impacts on commercial fishing. TTR's experts have reviewed the submissions and remain of the opinion that, the proposed consent conditions as will avoid, mitigate or remedy any adverse effects so that the proposal does not result in material harm to the marine environment, habitats and species.

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			response 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	
5	Changes to the marine environment such as ocean compositional parameters, climate and currents make predictions unreliable and therefore demand a precautionary approach.	Ecology, Sedimentation and Coastal Matters	n/a	The sediment plume modelling was run on real climate forcing data that spanned a wide range of climatic conditions from flat calm to intense storms and winds from all directions. This is sufficient to cover all the likely scenarios of climate change that may affect the STB over the period of mining operations.

Comments from Parkwind NV

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
1	The application should be declined as the economic benefits are not necessarily regionally or nationally significant and are outweighed by the adverse impacts.	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, 14-30 p.	Refer to NZIER’s evidence statement paras 14 to 30 on the scope and approach of NZIER’s EIA and assumptions and inputs used. It is not within the scope of NZIER’s commissioned work to assess the project delivery risk. But in responding to the submissions, we have applied an 8% discount rate, as per Treasury’s guideline for commercial investment proposals, to estimated future flows of the project’s economic benefits to reflect the project’s risk. Refer to paras 31 to 34 of NZIER’s evidence statement.
2	The application will have a number of significant impacts from the inability for offshore wind projects to proceed in the same area as the Project.	Operations / Process	Supplementary Technical Package: 32	The presence or otherwise of the tailings and their potentially loose nature doesn’t change anything or have any significant implications for any future deployment and founding of mobile jack-up drill rig platforms on the seabed. The spudcans will sink further into the seabed than for the untouched seabed case before they attain the ultimate bearing capacity resistance required but this is not of significance given that jack-ups are set up to recover spudcans that have sunk well into the seabed. Seabed mining and offshore wind energy (OWE) can potentially co-exist in the South Taranaki Bight as it’s a very large area (36,000km2) with potential for economic mineral deposits confined to certain geological terranes and localities confined to a few 1,000km2. However, OWE cannot occur simultaneously with seabed mining in exactly the same area, but OWE could be established on areas previously mined and rehabilitated immediately following mineral recovery (refer 45.3 above). TTR’s independent studies (45.3) suggest that it would take a relatively short time for the seabed to settle after mining and therefore will not result in any significant delays or barriers to OWE. In contrast, more permanent interventions in the seabed such as concrete tower foundation structures and seabed cable infrastructure would impact the viability of seabed mining, even after OWE is decommissioned.

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				The geological substate will require massive steel and concrete foundations, along with stabilising fluids, implanted deep into the seafloor (much deeper than the on average 5 metres of mining disturbance) to support the 300m towers and generating equipment. These permanent features along the networking of interconnecting cables draped on the seafloor, will never be recovered or allow any rehabilitation of benthic communities or the marine ecology in the area. OWE once approved effectively sterilises that location for any future seabed mining. TTR has no objection to OWE in the area however this cannot be undertaken on, or immediately adjacent to, active exploration and mining mineral permits and there would be work done to establish the size of any “buffer” zones. That work would need to involve consultation with other interests and regulators, notably Maritime NZ in relation to maintaining safe operating vessels, shipping and service routes. Selection of areas for OWE site selection, feasibility studies and operations, including infrastructure and transmission cable corridors need to be accompanied by an assessment of the potential impacts on existing activities and potential other interests in the area including the presence, or otherwise, of seabed mineral deposits and their value. Such assessment of OWE need to include a comparative economic impact assessment and cost benefit analysis of OWE compared to other uses including seabed mining, fisheries, shipping lanes and oil and gas. OWE economics and GDP benefits claimed are far exceeded by several orders of magnitude by seabed mining of VTM concentrates along the West Coast of the North Island (ref to TTR NZIER Report and MBIE Ministerial Briefing Paper to Minister of Resources - 23 November 2023). TTR has established rights in the STB. The company has been operating in the STB since 2008, invested >\$88 million in mineral exploration, resource development, marine research and environmental studies, has exploration and mining permits granted by the Crown and invested considerable resources in engineering solutions and feasibility studies, underpinned by economic studies to establish a new export industry with significant regional and national benefits and intends to maintain these rights on behalf of its investors. TTR has written to all the OWE potential developers and offered to engage with them on addressing the issues with the two industries working together and co-existing in the STB. These overtures have been rebuffed to date OWE interests. TTR has undertaken extensive marine research and drilled 1,000’s of drill holes in the STB that can be shared, by agreement, with OWE that address the marine ecology, seabed strata and substrate and the depth of the supers saturated fluidised black sands and their location. OWE interests need to explore their options, do the necessary data gathering and meaningful research, effects studies, engage with existing interests and stakeholders in the area. With consultation, TTR believes both activities, OWE and mineral recovery, can co-exist in the STB with sensible consultation and co-operation and reference to the facts of the proposals and activities contemplated or existing.
3	There is a significant risk of flow liquefaction that will render it impracticable and unsafe for future wind offshore or oil & gas purposes.	TTR/Siecap	Supplementary Technical Package: 32	Summary: OCEL Consultants NZ Limited (OCEL) (Supplementary Technical Report 32), in conjunction with NZ Diving and Salvage Limited (NZDS) has undertaken a total of 5 geotechnical investigations and founding evaluations for jack-up drill rig deployments off the West Coast of the North Island of NZ including liquefaction potential [section 7]. OCEL concludes: The presence or otherwise of the tailings and their potentially loose nature doesn’t change anything or have any significant implications for any future deployment and founding of mobile

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				jack-up drill rig platforms on the seabed. The spudcans will sink further into the seabed than for the untouched seabed case before they attain the ultimate bearing capacity resistance required but this is not of significance given that jack-ups are set up to recover spudcans that have sunk well into the seabed.
4	Approval of the application would jeopardise investment in New Zealand's emerging offshore wind industry.	TTR/Siecap	N/A	TTR wrote to Peter Spencer of Parkwind and Giacomo Caleffi of TOP on 2 September 2024 (along with other proposed OWE proponents Blue Float, Energy Estate, Ocean Ex Energy, Sumitomo Group and Wind Quarry). The letter said that New Zealand's interests were best served by TTR working with OWE developers to enable both activities to occur in the South Taranaki Bight and asked for a meeting to discuss. On 27 September 2027, TTR received the identical response from Peter Spencer and Giacomo Caleffi (as well as Nathan Turner of Blue Float and Kosuke Shiraji of Sumitomo). The response declined the meeting based on 'milestones that need to happen'. Neither JERA nor TOP took the opportunity to discuss how the two sectors could co-exist in the South Taranaki Bight. The OWE companies have shown no intent or interest to engage with TTR or to discuss how both could operate in the South Taranaki Bight in the best interests of New Zealand. TTR said in its letter that it would require good co-operation and communication. TTR has worked positively and met with officials at the Ministry of Business Innovation & Employment (MBIE) on plans to establish an OWE regulatory regime.
5	Should the application proceed, it is highly unlikely offshore wind farms could be built in the same area for the foreseeable future.	TTR/Siecap	N/A	The presence or otherwise of the tailings and their potentially loose nature doesn't change anything or have any significant implications for any future deployment and founding of mobile jack-up drill rig platforms on the seabed. The spudcans will sink further into the seabed than for the untouched seabed case before they attain the ultimate bearing capacity resistance required but this is not of significance given that jack-ups are set up to recover spudcans that have sunk well into the seabed. Seabed mining and offshore wind energy (OWE) can potentially co-exist in the South Taranaki Bight as it's a very large area (36,000km²) with potential for economic mineral deposits confined to certain geological terranes and localities confined to a few 1,000km². However, OWE cannot occur simultaneously with seabed mining in exactly the same area, but OWE could be established on areas previously mined and rehabilitated immediately following mineral recovery (refer response 3 above). TTR's independent studies (refer response 3 above) suggest that it would take a relatively short time for the seabed to settle after mining and therefore will not result in any significant delays or barriers to OWE. Summary: OCEL Consultants NZ Limited (OCEL) (Supplementary Technical Report 32), in conjunction with NZ Diving and Salvage Limited (NZDS) has undertaken a total of 5 geotechnical investigations and founding evaluations for jack-up drill rig deployments off the West Coast of the North Island of NZ including liquefaction potential. OCEL concludes: The presence or otherwise of the tailings and their potentially loose nature doesn't change anything or have any significant implications for any future deployment and founding of mobile jack-up drill rig platforms on the seabed. The spudcans will sink further into the seabed than for the untouched seabed case before they attain the ultimate bearing capacity resistance required but this is not of significance given that jack-ups are set up to recover spudcans that have sunk well into the seabed.

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6	The economic benefits are overstated and unlikely to be regionally or nationally significant. The economic modelling undertaken is insufficient, and has not considered all necessary inputs.	Economic	Response Evidence: 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 p.31 - p.34	Refer to 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 p.31 - p.34

Comments from Mark Bamford

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1	Data interpretation and methodology is inappropriate due to using models developed for other areas, purposes and environments. Inadequate location specific research undertaken.	Ecology, Sedimentation and Coastal Matters	Footnote documents referenced: FN96	The fish distribution models were based on tens of thousands of research trawls undertaken around New Zealand including hundreds in QMA8 and the STB. These are the best available data for the STB and would never be able to replicated by any applicant. The fishing data provided in MacDiarmid et al. (2024) are up to date and are displayed at the finest scale allowed by Fisheries New Zealand to protect the fishing locations of individual fishers.
2	Unknown effects of the seabed mining activity on fish aggregation, feeding and spawning has not been adequately investigated.	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.
3	NIWA and Fathom Consulting reporting underestimates the importance of the site to commercial fishing industry. Loss of the area will have widespread effects to local and regional operators.	Ecology, Sedimentation and Coastal Matters	Footnote documents referenced: FN96	The fishing data provided in MacDiarmid et al. (2024) are up to date and are displayed at the finest scale allowed by Fisheries New Zealand to protect the fishing locations of individual fishers.
4	There are restrictions where fishing can occur due to the Quota Management System and the project area is a particularly unique habitat.	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 Response Evidence: Evidence of Dr Alison MacDiarmid (Marine Ecology) on behalf of Trans-Tasman Resources Limited in response	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. 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. Additionally, Condition 86 will ensure ongoing communication with commercial fishers is maintained as to the mining programme for the duration of the project.

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			to comments received 13 October 2025	
5	Displacement of fisheries will harm the value of quotas.	Planning	Substantive FTA Application: Section 5.13.2 Supplementary Technical Package: 10, 10a,10b,10c, 17, 18, 25 Evidence Response: Joint Statement of Christina Leung and Ting Huang (Economics) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025’ – para 42 - 48	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 amount of displaced catch in both the trawl and set net fisheries will be small, and 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. The economic impacts on fisheries have also been considered in the NZEIR evidence in response to comments received.
6	Sediment dispersal will cause smothering of reef systems. Many fish species are migratory and impact to water quality/disturbance to spawning will affect fish species across a wide geographical distribution.	Ecology, Sedimentation and Coastal Matters	n/a	The sediment plume modelling and worst case modelling shows that only those reefs within 2-3 km of the active site of mining are at serious risk of harm. Migratory fishes are at the least risk as they are likely to move away from the sediment plume – thus any impacts will be spread across a wide geographical area and reducing in intensity at any one point.
7	Large parts of supporting information in the application relating to commercial fishing is inaccurate. The importance and value of the fishery is understated.	Ecology, Sedimentation and Coastal Matters	Substantive FTA Application: Section 5.13.2 Supplementary Technical Package: 10, 10a,10b,10c, 17, 18, 25 Evidence Response: 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	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 stated in paragraphs 47 to 54 of the 2025 evidence of Dr 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. Furthermore, proposed condition 86 requires the consent holder to arrange 6-monthly meetings with fisheries industry stakeholders, to ensure a coordinated approach between the seabed material extraction activities and commercial fishing activities, including communications protocols.

