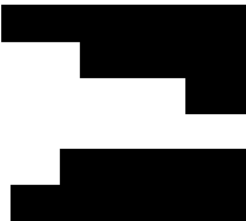


BEFORE AN EXPERT PANEL
IN NEW PLYMOUTH | NGĀMOTU ROHE

UNDER THE	Fast-track Approvals Act 2024 (“FTAA”)
IN THE MATTER OF	an application by Trans-Tasman Resources Limited under the FTAA
BETWEEN	TRANS-TASMAN RESOURCES LIMITED Applicant
AND	THE EXPERT PANEL Consent authority

COMMENTS OF [REDACTED] FOR ARAUKUUKU
6 OCTOBER 2025

BLACK LAW



Counsel:



MAY IT PLEASE THE PANEL:**INTRODUCTION**

1. These comments are provided in response to the application of the Taranaki VTM Project to obtain marine consents under the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012.
2. My name is [REDACTED]
3. I am the mandated representative for Araukuuku hapū in respect of this matter.

Araukuuku hapū

4. Araukuuku are descended from those aboard the Aotea waka which arrived in the fourteenth century captained by Turi-te-Ariki-nui. After arriving in Aotearoa, Turi, Rongorongo and the rest of our Aotea ancestors travelled overland along the coast from Kawhia to Patea.
5. We are a shared hapū of Ngāruahine and Ngāti Ruanui. We are also Ngāti Maru. Our rohe moana extends seawards from the Whenuakura River to the Taungatara Stream, and outwards from that coastline to Hawaiki-nui, Hawaiki-roa, Hawaiki-pamaomao and Tawhiti-nui, Tawhiti-roa, Tawhiti-pamaomao.
6. Araukuuku has an application for recognition of our interests under the Marine and Coastal Area (Takutai Moana) Act 2011 from Waingongoro to Taungatara. It is in this capacity that we have been invited by the Panel to comment on the application in question under section 53(3) of the Fast-track Approvals Act 2024.

Araukuuku interests

7. Araukuuku has a fundamental and defining relationship with the moana and those who live within it.
8. We have fished its waters and cared for our taonga species since our first arrival.

Taonga and identity

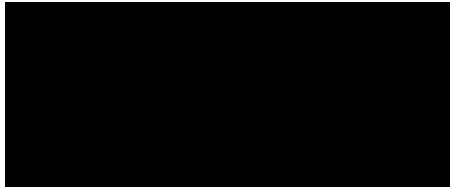
9. Taonga species include snapper, koura, kuukuu mussel, kahawai, shark, terakihi, moki, kingfish, tohorā, wātakirihi, puha, rimu, parengo (which some know as karengo), poroporo, and kekeno, the fur seal. Some of these species are migratory, through other parts of the moana and in some cases through our rivers as part of their breeding and life cycle.
10. These species do not just sustain us, we also sustain them through careful management of their environment and their requirements, through karakia, rāhui, and other tikanga-based management tools. To be Araukuuku is to honour Ngā Atua, and to care for and be nourished physically and spiritually by the moana and its occupants. These relationships became even more critical following the raupatu, the deeply unjust land confiscations of the 1860s. The moana and our taonga species are not separated from us in the way they are for Pākehā. They are fundamental to what it is to be Araukuuku – they are essential to our very identity.

Concerns regarding this mining application

11. The reports provided by the applicant are not up to date, and they do not consider the impact on Araukuuku. We were not consulted on any element of the application, despite our centuries-long status as mana moana.
12. We are deeply concerned about the impacts of noise and sediment drift on our taonga species. The application does not appear to contemplate the possibility of Araukuuku rāhui, which we impose in order to remove pressure from taonga species and environments in order that effects can be studied and, if necessary, populations can recover.
13. We have insufficient information about the effects of sediment and noise on tohorā and their migration paths, and the migration paths of smaller taonga species, and the application does not fill these gaps.
14. The application does not address CO₂ and other emissions from the mining, transport, and processing activities. Climate change is a known contributor to changes in ocean currents, which we expect to impact our taonga both offshore and closer in to the coast.

15. Araukuuku opposes this application in its entirety, and fully supports the position of Te Rūnanga o Ngāti Ruanui, Te Kaahui o Rauru, and Te Korowai o Ngāruahine in their opposition.

Dated this 6th day of October, 2025

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A small black rectangular redaction box covering the name.