TARANAKI VTM PROJECT

RESPONSES ON BEHALF OF TRANS-TASMAN RESOURCES LIMITED TO REQUEST FOR INFORMATION DATED 11 DECEMBER, FOR ANY COMMENTS ON THE FATHOM (2025) REPORT

12 December 2025

1. This response addresses the request dated 11 December 2025 for any comments TTR wishes to make on the report by Fathom Consulting Ltd "Commercial fisheries in the vicinity of TTR's proposed mining site" (Fathom (2025)). The response has been compiled by Dr MacDiarmid and counsel for TTR.

General comments

2. Before turning to specifics, we make the general observation that the Fathom report makes a fundamental error by treating the Sediment Modelled Domain (SMD) as "the area where any potentially significant impacts from sediment discharged by the project could occur".[1] The report misleadingly labels this the 'affected area'.

3. This perpetuates the selective and misleading reading of TTR's application by Seafood NZ.[2]

4. The relationship between the SMD, the larger ~36,000m^2 area of the STB, and any potentially significant impacts from the project, are described in TTR's application in these terms:

> "This SMD covers approximately half of the STB (approximately 13,300km2) and **covers** the area where any potentially significant impacts from sediment discharged by the project could occur".
>
> (emphasis added)

In other words, any potentially significant impacts would be confined to the SMD. This does not mean (as both Seafood NZ and Fathom seem to think) that the entire SMD will potentially receive significant impacts.

5. We also note that Fathom previously assessed, both in 2013 and in 2015, that with appropriate management of sediment there would be no significant impacts from the project on commercial fisheries. The Fathom (2025) report omits to

[1] As described on page 5 of the Fathom Report.
[2] Addressed in the Legal Submissions on Behalf of Trans-Tasman Resources Limited in Response to Comments Received, 13 October 2025 at [151].

identify these prior assessments, or provide any direct explanation for the apparent change in position between the 2013/2015 and 2025 reports.

Detailed comments

6. Much of the Fathom (2025) report states fishery statistics and trends in catch and effort that TTR does not dispute – these are a matter of public record.

7. However, as addressed above, the approach adopted by Fathom overstates the areas potentially impacted. Half the time the area affected by suspended sediments elevated to the 2 mg per litre levels known to cause displacement of fish is much smaller than TTR's project area (see the orange and green outlined areas in the figure below when mining occurs at the north-eastern or south-western parts of the project area respectively) and a small fraction of the "affected area". The 99th percentile areas for suspended sediments elevated to 2mg per litre are similarly much smaller than Fathom's "affected area". To claim the whole SMD as potentially affected is grossly overstating the impacts.

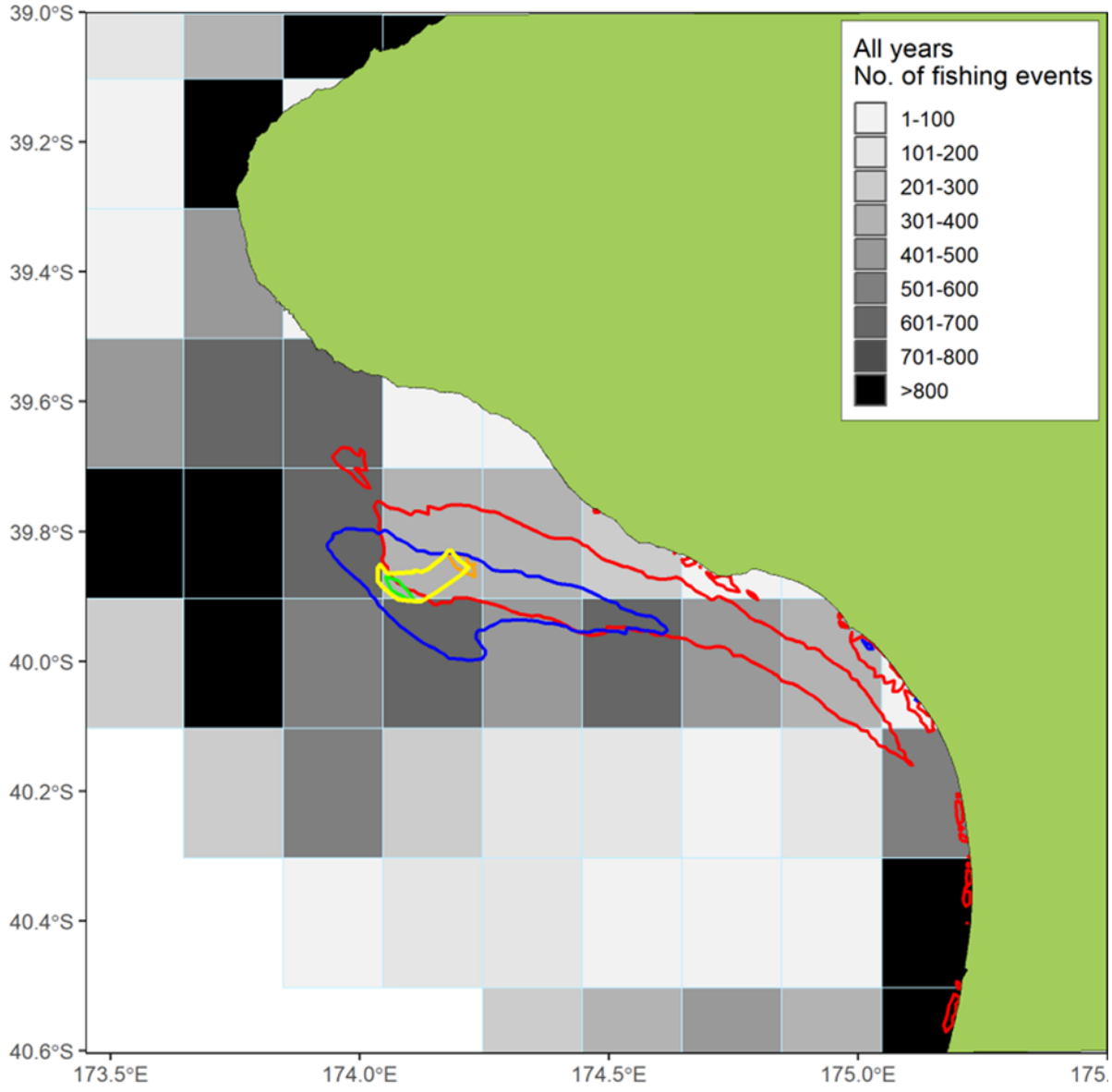

Figure 2-1 from MacDiarmid et al. (2024)[3]: The number of fishing events aggregated into 0.2 degree squares for FMA 8 for fishing years 2008–2023. The PPA is shown in yellow, Mining A median SSC area in orange, Mining A 99th percentile SSC area in red, Mining B Median SSC area in green, and Mining B 99th percentile SSC area in blue.

8. TTR disagrees with the conclusions in paragraph 3 on page 13 of the Fathom (2025) report that states "the inshore trawl fishery would be significantly affected by the proposed mining activity". Figure 12 in the Fathom report indicates that less than 1% of the catch of trevally, snapper and gurnard comes from the TTR project area. This table, by reporting catches in the "affected area", grossly overstates effort and catches that could be affected by the mining activities. For example, MacDiarmid et al. (2024) report, using Fisheries New Zealand official data, that there were just 3 bottom trawls in the 99th percentile area in the

[3] MacDiarmid A., MacGibbon D., and Anderson O. (2024) South Taranaki Bight Fishing: 1 October 2007 - 30 September 2023, NIWA Client report prepared for Trans Tasman Resources Ltd, 37 p.

2022/23 fishing year whereas the Fathom report in Figure 11 lists 379 bottom tows from the "affected area" in this same period. By including fishing activity from a much larger area the Fathom report grossly overstates the impact.

9. TTR disagrees with the statement at the top of page 18 of the Fathom (2025) report that "a substantial proportion of the valuable JMA 7 could be at risk". The Fathom report itself identifies that no catches of jack mackerel occur in the mining area and the figure provided above indicates that areas of suspended sediments elevated above 2mg per litre will not occur offshore where this fishery is undertaken.

10. TTR disagrees with the conclusion at the bottom of page 19 of the Fathom (2025) report which states "the area potentially affected by TTR's proposed mining activities is therefore a very significant part of the CRA9 rock lobster fishery." The Fathom (2025) report correctly states that there was no catch of rock lobsters inside the TTR project area. This is because rock lobsters occur on and immediately adjacent to areas of elevated rocky reef that provide foraging grounds and daytime crevice shelters that rock lobsters use to survive storm events and evade predators. These reef structures typically occur closer inshore, 10 or more km from the mining site. At this distance mining derived suspended sediments will be close to background and highly unlikely to have any impact on rock lobsters.

11. TTR completely disagrees with the suggestion (implied by the penultimate paragraph on page 22 of the Fathom (2025) report) that mining activities will cause an increase in mud or fine particles in the surf-zone habitat along the Manawatu coast and thus put the surf-clam fishery at risk. The sediment plume model can track mining derived sediment through this area but they will occur in tiny concentrations that do not change the background levels of suspended sediments. This area is dominated by suspended sediments introduced into the near shore zone by the Manawatu River and others further north.