SECTION 7

CONSULTATION SECTION APPENDICES

Appendix 7.1: TR De Beers Marine Visit 23 -27 March 2015 Proposed Agenda

Trans-Tasman Resources Limited





Proposed Agenda

Mond	day: 23 March 2015 (DBM Host: Kevin Richardson)
9:00	Welcome and Housekeeping
9:30	Delegation Introductions and expectations
10:00	Introduction to De Beers Marine
10:30	Morning Tea
11:00	TTR project and De Beers Involvement
12:00	Introduction to Marine Mining; History, Tools and Processes.
13:00	Lunch
14:00	Marine Mining: Social, labour and fiscal benefits and impacts (South African and Namibian Context)
14:30	IHC presentations

Tuesday: 24 March 2015 (DBM Host: Alan Jones)

9:00	Welcome and Safety Briefing
9:30	Travel to Dry Dock, Cape Town Harbour
10:00	Tour Dry Dock: Mining Vessel
13:00	Lunch (Panama Jacks – Cape Town Harbour)
14:30	Tour Paarden Eiland
16:00	Break

16:00 Break

19:00 NZTA Function

Wednesday: 25 March 2015 (Host: Lesley Roos)

- 9:00 Welcome and Introduction to Participating Scientists
 - Dr Andrea Pulfrich (Director of PISCES Environmental Services (Pty) Ltd)
 - Dr Barry Clark (Director of Anchor Environmental)
 - Prof Mark Gibbons (Head of Department, Biodiversity and Conservation Biology, University of Western Cape)
 - Mr Dave Japp (Director CapFish Pty Ltd)
- 9:15 TTR Supplementary Science overview
- 10:30 Tea
- 11:00 Overview of South African Legislative Environment
- 11:30 Overview of Marine Diamond Mining Environmental Studies
- 12:00 South African Sea Areas Offshore Diamond Mining Right Context
- 12:30 Lunch
- 13:30 South African Sea Areas Offshore Diamond Mining Right Environmental Impact Assessment (addressing seabed disturbance, marine mammals, tailings, pollution prevention)
- 14:30 South African Sea Areas Offshore Diamond Mining Right:Environmental Management Programme and Closure Planning
- 15:30 Summary of Lesson's Learned and Recommendations
- 16:00 Break

18:00 for 18:30 TTR/DeBeers Function (Pepénero – Mouille Point)

Thursday: 26 March 2015 (DBM Host: Kevin Richardson)

- 9:00 Welcome and Debrief
- 9:30 Wrap Up, Clarification, Additional Questions, Outstanding Issues
- 12:30 Break

Friday: 27 March 2015

- 9:30 TTR Day Excursion
- 13:00 Farewell

Brief Background of the Scientists invited to the session:

• Dr Andrea Pulfrich (Director of PISCES Environmental Services (Pty) Ltd)

Andrea obtained her doctorate at the Institute for Marine Science at the Christian-Albrechts University of Kiel, Germany. She has over 20 years' experience in marine biology with particular expertise in EIAs and specialist studies on coastal and marine environments in South Africa, Europe and Australia. Andrea is the founder and director of PISCES Environmental Services (Pty) Ltd. The company was established in January 1998 to help fill the growing need for an expert interface between users of the coastal and marine environment and the various national and provincial management authorities. Since then, PISCES has been providing a wide range of information, analyses, environmental assessments, advice and management recommendations to these user groups, particularly the South African and Namibian marine diamond mining and hydrocarbon industries.

Andrea's expertise includes producing EIAs and EMPs for marine diamond mining, specifically investigating and monitoring the impact of diamond mining on the marine environment and fisheries resources, as well as assessments of dredging-related impacts and thermal effluents on coastal marine biota. Working closely with various institutions and government departments, she has been involved with the design and implementation of deepwater benthic sampling surveys, sample analysis and macrofauna identification.

• Dr Barry Clark (Director of Anchor Environmental)

Barry has a PhD in marine and estuarine ecology from the University of Cape Town (1997). He has twenty-one years' experience in marine biological research and consulting on coastal zone and marine issues. He has worked as a scientific researcher, lecturer and consultant and has experience in tropical, subtropical and temperate ecosystems. His main area of scientific study involved fisheries management and the biology and ecology of marine and estuarine fishes.

Barry is presently the Director of an Environmental Consultancy firm (Anchor Environmental Consultants) and Research Associate at the University of Cape Town. As a consultant, Barry has been concerned primarily with conservation planning, monitoring and assessment of human impacts on estuarine, rocky shore, sandy beach and temperate and coral reef communities as well as coastal and littoral zone processes, aquaculture and fisheries. He is the author of 27 scientific publications in class A scientific journals as well as numerous scientific reports and popular articles in the free press. Geographically, his main area of expertise is southern Africa (South Africa, Namibia, Mozambique, Tanzania and Angola), but he also has working experience from elsewhere in Africa (Cote d'Ivoire, Ghana, Nigeria), the Middle East (UAE) and Europe (Azerbaijan).

Prof Mark Gibbons (Head of Department, Biodiversity and Conservation Biology, University of Western Cape)

Mark obtained his doctoral degree in Zoology from the University of Cape Town in 1988 on the ecology of rocky shore meiofauna, before working with the Benguela Ecology Programme on trophic relationships within the zooplankton. He was seconded to the University of the Western Cape in 1995, and joined the permanent staff at the end of 1996 where he was promoted through the ranks to become a Full Professor in 2006. His research focuses on marine diversity, and he has trained a number of UWC students in the taxonomy/systematics of marine invertebrates for which there has been no expertise within Africa. Mark has played a vital role in the transformation of South African marine science and many of his past students are playing key roles in the Department of Environmental Affairs and other Governmental agencies tasked with directing the marine conservation agenda.

He's published 92 papers in peer-reviewed scientific journals (including such top international publications as TREE, Nature, Science and Current Biology), and authored/co-authored 6 book chapters, 14 technical reports and 23 popular science articles. He serves on a number of science advisory boards both locally and internationally, and has research collaborators at the University of Bergen in Norway, the Commonwealth Scientific and Industrial Research Organisation (Australia's national science agency) and at the National Marine Information and Research Centre in Swakopmund, Namibia.

Mr Dave Japp (Director CapFish Pty Ltd)

Dave is an International and Regional Consultant and Director of CapFish, a Marine Monitoring and Fisheries Consulting Group based in Cape Town. The Company works closely with national marine management authorities as well as with Regional and International Fisheries Management Organisations (RFMOs). Activities include working directly with fishers, hydrocarbon exploitation (e.g. seismic surveys), Non-Governmental Organisations such as WWF and Birdlife, and many other groups. Dave was previously employed at the Sea Fisheries Research Institute (SFRI) from 1988 to 1997 as a biologist and manager and at the time he left this institution was head of the offshore resources section (demersal and pelagic stocks).

Dave has a detailed knowledge of global fisheries, fishing and gears deployed across most fishing sectors. Further he manages a large domestic and regional Observer programme and works closely with NGOs, management authorities and fishers addressing mitigation methods to reduce negative fisheries impacts. His work as a consultant has included offshore impact assessments on Phosphate Mining and Hydrocarbon Exploitation and participation in a Strategic Impact Assessment (SEA) commissioned by the Benguela Current Commission (BCC).

Appendix 7.2: TTR's STAKEHOLDER INFORMATION PACKAGE



TTRL OFFSHORE IRON SANDS PROJECT

INTRODUCTION













INTRODUCTION

In 2016 Trans-Tasman Resources Limited (TTR) will lodge marine consent application with the Environmental Protection Authority (EPA) under the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012 (EEZ Act) for the recovery of iron sand from the South Taranaki Bight. This new application follows a previous application by TTR in 2013 / 2014, which was declined by a Decision-Making Committee (DMC) appointed by the EPA.

As part of preparing its revised marine consent application, TTR is seeking to consult with key stakeholders and iwi regarding the iron sands project and to provide information on how potential environmental effects will be managed and monitored. In light of this, the purpose of this stakeholder engagement package is to provide information to key stakeholders on the iron sands project and the revised suite of environmental assessments that have been commissioned by TTR.

This stakeholder engagement package contains the following information:

- 1. An overview of the iron sands project, including the methodology that will be employed by TTR to recover iron sand from the seabed outside of the 12 nautical mile limit between Patea and Hawera;
- 2. An overview of the projected economic benefits of the project;
- 3. An overview of the additional science that has been commissioned by TTR with respect to the expected extent and density of the plume, including its effects on optics and primary production; and
- 4. A summary of other environmental assessments and where applicable, the findings of the peer reviewers engaged by the EPA for the previous marine consent application together with the results of any related expert witness conferencing held prior to the previous hearing.

TTR is seeking that key stakeholders review the information provided in the stakeholder engagement package to obtain an understanding of the project and its predicted environmental effects. TTR will arrange meetings with key stakeholders to address any questions regarding the operation of the irons sands project and the results of the additional scientific information that has been commissioned. These meetings will commence in October 2015.

TTR is able to provide stakeholders with copies of the draft environmental assessments referenced in the stakeholder engagement package. However, the circulation of these draft assessments to key stakeholders will be contingent on agreement between TTR and respective key stakeholders regarding the protection of TTR's intellectual property. This matter can be discussed at the forthcoming meetings.

A comprehensive summary of the various new work undertaken by international independent experts is contained in the following package. However, because the 'plume-related' effects of the proposal have been significantly refined as a result of this new work, a brief summary is provided, as follows:













1. NEW SCIENTIFIC INFORMATION

The DMC that considered TTR's original application for marine consent noted the uncertainties around the scale of the predicted effects on the environment, particularly the assumptions with regards to the extent and density of the plume, the effects on primary productivity, and the scale of impacts on existing interests - specifically iwi and commercial fishing interests (EPA, 2014). In light of this, TTR has undertaken an extensive programme to supplement and update its modelling and assessment on the extent and density of the plume that will be generated during the recovery of iron sand.

The objective of the programme undertaken by TTR has been to provide additional, refined technical information about the extent and density of the sediment plume. To undertake this programme of work TTR has augmented local expertise by retaining world-leading experts in sediment modelling, optics and primary production from the United States of America and United Kingdom. An overview of the assessments undertaken by TTR's scientific team is provided in the attached stakeholder engagement package, and is summarised below.

1.1 Plume Modelling

The international experts retained by TTR have undertaken detailed peer reviews of the original models developed by NIWA, and also undertaken further testing on the re-deposition of sediment material in order to enable more accurate modelling of the extent and density of the plume. In particular, the peer review and testing by HR Wallingford Ltd (**HRW**) has allowed for more accurate modelling of the plume in relation to the following:

- Flocculation the original plume model neglected flocculation, a mechanism whereby fine sediment combines into faster-sinking aggregate;
- Sediment settling rates the extent to which the fine suspended sediment would settle to the bottom and be trapped in the matrix of discharged sand is predicted to occur to a greater extent than previously assumed; and
- Sediment re-suspension the testing by HRW found that the shear stress required for re-suspension of freshly deposited material was in the range 0.2–0.3Pa rather than the 0.1Pa (minimum value), as originally assumed by NIWA.

The increased definition in the elements listed above on the predicted plume extent and density can be demonstrated by comparing the median near-surface results for the most inshore and offshore mining locations in the modelling done in 2014 to that done in 2015. This is demonstrated in Figures 1 to 4 below (noting in particular that the shading represents any modelled concentration that is above zero, irrespective of whether it is even discernible – the grey shading in the figures represents a concentration of less than 0.2 milligrams of sediment per litre of seawater. Note also that one teaspoon of this sediment weights around 15 grams, so the grey line represents about 1/75,000th of a teaspoon of sediment in a litre of seawater:













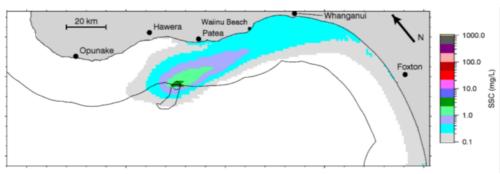


Figure 1 Inshore Sediment Release Median 2014

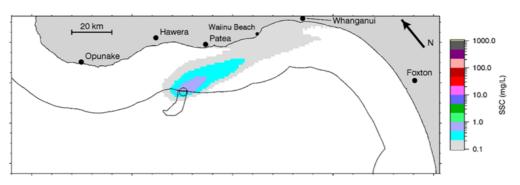


Figure 2 Inshore Sediment Release Median 2015

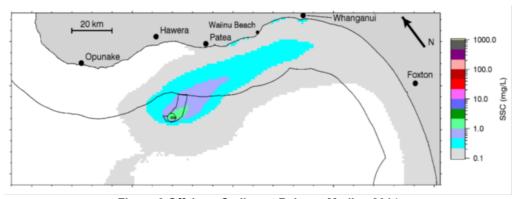


Figure 3 Offshore Sediment Release Median 2014

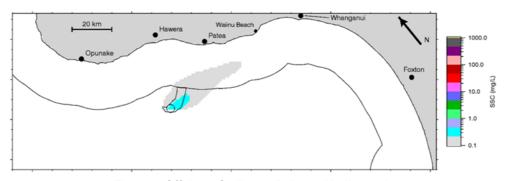


Figure 4 Offshore Sediment Release Median 2015













Figures 2 shows the extent of the plume is reduced in the 2015 model and the near surface, suspended source extends to the east-southeast. Between Patea and Whanganui the suspended concentrations are substantially less than naturally occurring background concentrations (100 times less). The highest surface concentrations occur at the source location and are approximately 1.45mg/l (median), or approximately 1/10,000th of a teaspoon per litre. Approximately 20km 'downstream' from the source location the surface concentrations reduce to around 0.35mg/l (median) or approximately 2/100,000th of a teaspoon per litre.

For the furthermost offshore mining location within the mining area, Figure 4 shows the plume is located further offshore but follows a similar path to the east-southeast, but with the concentrations being significantly lower still.

1.2 Optics

With respect to the predicted changes to the optical properties in the South Taranaki Bight, the previous modelling by NIWA has been updated in response to the results of the new sediment transport modelling. The main conclusions of the optical modelling based on iron sand recovery at two different representative locations (Site A, which is located at the inner limit of the proposed operations, close to the 12 nautical mile limit and Site B, which is located at the outer extent of the proposed operation) are:

The optical effects of the iron sand recovery operations are likely to cease very quickly after the operations cease;
There is substantial natural variability in optical properties in the modelled area, with greater turbidity at the coast;
The optical effects of the plume decrease away from the iron sand recovery operations;
The optical effects of the plume will be greater in the offshore area than in the nearshore area, with effects being minimal close to the coast (i.e. within approximately 5km of the coast);
Average light in the water column averaged over the domain of the sediment model (an area of 13,000km²) is predicted to be reduced by only a small amount -approximately 1.9% based on ore recovery at Site A and 1.6% based on ore recovery at Site B; and
The total amount of light received by the seabed in the domain of the sediment model is predicted to reduce by 23% (Site A) and 16% (Site B), and this reduction will occur primarily east of the proposed iron sand recovery operation.













1.3 Primary Productivity

The potential effects of the project on primary productivity have now been recalculated as follows:

Light in the water column, integrated over the modelled area and averaged by year, is predicted to reduce 1.9% at Site A and by 1.6% at Site B;
 The total amount of light at the seabed, over the whole modelled area averaged over a year, is predicted to reduce by 24% at Site A and by 15% at site B;
 The project will reduce energy flow to the seabed ecosystem, averaged over the modelled area, by 5.8% at Site A and by 4.1% at Site B;
 The project with reduce water column primary production, averaged over the modelled area, by 1% at Site A and 0.8% at Site B; and
 The project will reduce benthic primary production, averaged over the modelled area, by 19% at Site A and 13% at Site B.

The analyses of the field data, coupled with modelling of the character of the sediment plume from iron sand recovery operations, its trajectory and duration, and its optical effects, and the analyses of these effects on primary production in the modelled area strongly support the conclusion that the overall effects of iron sand recovery operations on short-lived organisms (i.e. those living less than a year or two) will be indistinguishable within natural oceanographic variability. Effects at local scale proximal to the iron sand recovery operations will be limited to decreases in microphytobenthos production and organic carbon availability to benthic consumers. This may exceed natural variability and may propagate locally to organisms that feed primarily on microphytobenthos and in turn to their predators.

1.4 Marine Ecological Effects

TTR has also commissioned NIWA to provide an assessment of the effects of the proposed iron sand recovery activities on key zooplankton, fish, seabird and marine mammal species - taking into account the spatial and temporal scales relevant to different components of the ecosystem. This assessment has also taken the latest sediment transport and optical modelling results into consideration.

The assessment of the spatial and foraging ecology of the key fauna occurring in the South Taranaki Bight has identified that the environmental effects will be negligible for all zooplankton, seabird, and marine mammal species, and most fish species. For coastal kaimoana species, the proposed iron sand recovery activities should not add significantly to the levels of suspended sediments currently experienced inshore in frequently turbid waters.













The assessment did identify that eagle ray may be affected by iron sand recovery activities. Although the area potentially impacted by iron sand recovery comprises less than 1% of the area of distribution of eagle ray in Fisheries Management Area 8, approximately 8% of its core area of distribution (>50% occurrence) overlaps with the area where suspended sediment concentrations will be elevated above 3mg/l. Using this threshold, a minor to moderate proportion of the eagle ray stock could be affected by mining through displacement of fish, or decrease in prey abundance or availability.

During summer and autumn eagle rays tend to concentrate inshore in water less than 10m deep where background suspended sediment concentrations may naturally reach over 100mg/l. This means that eagle rays may be tolerant to significantly higher suspended sediment concentrations than the threshold of 3mg/l used to assess the impact of the proposed iron sand recovery activities.

This is a substantially reduced level of effect than may have been inferred from the previous application, and in TTR's opinion should give stakeholders and iwi considerable confidence that this project can proceed in an environmentally appropriate and sustainable manner.

2. OVERALL SUMMARY

The new modelling and scientific assessments undertaken by internationally recognised experts fundamentally recasts understanding of the scale and extent of the potential environmental effects associated with the recovery of iron sand from the seabed of the South Taranaki Bight. In this regard, it can be demonstrated that the plume associated with iron sand recovery will produce changes in sediment concentrations that are within the range of natural variability at the scale of the modelled domain or the wider South Taranaki Bight and will not result in any ecologically significant adverse effects on primary productivity or fixed carbon flux to marine ecosystems at the large scale. Significant localised effects may occur but these would be patchy and episodic in nature and the ecosystem would recover once the recovery activities progress or stop.

TTR looks forward to discussing the project and answering any questions regarding the new modelling and scientific assessments with key stakeholders. As already, a representative of TTR will make contact with you in the near future to arrange a convenient time to commence these discussions.



TTRL OFFSHORE IRON SANDS PROJECT

PROJECT DESCRIPTION













1. INTRODUCTION

Trans-Tasman Resources Limited (TTR) is a privately-owned New Zealand registered company with its headquarters in Wellington. The company was established in 2007 to explore, assess and develop offshore iron sand deposits within New Zealand. It is committed to using world best practice to both maximise the efficiency of the sediment recovery and processing activities, while at the same time minimising any environmental effects.

2. THE PROJECT

TTR intends to seek marine consent from the Environmental Protection Authority (EPA) under the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012 (EEZ Act) for the recovery of iron sand from an area of 65.76 square kilometres located outside the 12 nautical mile limit between Patea and Hawera (Figure 1).

TTR holds exclusive mineral rights over this area in accordance with Mining Permit 55581, which was granted by New Zealand Petroleum and Minerals in May 2014. The mining permit provides TTR with exclusive rights, under the Crown Minerals Act 1991 to recover iron sand from the area for 20 years.

TTR will be seeking all necessary marine consents under section 20 of the EEZ Act in order to authorise the iron sand recovery operation. The extent of the iron sand resource within the recovery area is shallow (generally no more than 11m deep below the seabed) but widely dispersed. The area provides sufficient space for project operations (including extraction, de-ored sediment redeposition operations), anchor handling and potential grade control drilling.

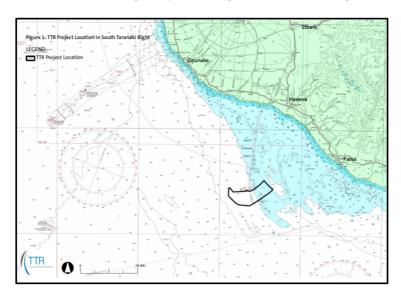


Figure 1: TTR Marine Consent Location in the South Taranaki Bight













3. PROJECT SCALE AND DURATION

The proposed operations are designed to recover, produce and export up to 5 million tonnes of iron sand concentrate per annum. To achieve this production the sediment extraction equipment will have the capacity to recover and process up to 8,000 tonnes of sediment per hour.

Operations will occur 24 hours a day, 7 days per week, with an estimated 28% downtime due to inclement weather, vessel operations, plant and equipment maintenance and anchor relocation.

TTR intends to apply for a marine consent with duration of 20 years in accordance with section 73 of the EEZ Act. This duration takes into consideration the time required to construct and commission a purpose built Integrated Extraction Vessel, as well as allowance for post operational monitoring.

4. IRON SANDS MINERAL RESOURCE

Iron sands generally form onshore beach and dune deposits, however extensive deposits also exist offshore of the west coast of the North Island. These deposits occur along 480km of coastline from Kaipara Harbour in the north to Wanganui in the south.

The iron sands targeted by TTR comprise a black, heavy, magnetic iron ore that originated as crystals in volcanic rocks largely derived from Mount Taranaki. Over thousands of years these rocks have been washed down by rivers, transported along the coast by shallow-marine long-shore currents, and subsequently concentrated offshore by historical wave and wind action into offshore remnant beach and dune lag deposits located 22-36km offshore in water depths of 20-42 metres.

5. SEDIMENT RECOVERY OPERATIONS

The iron sand recovery operations will involve five special purpose vessels designed to recover, process and handle the iron sand sediment. These vessels include the Integrated Mining Vessel (IMV), a purpose-built vessel that recovers, processes and transfers the iron sand concentrate; the Floating Storage and Offloading (FSO) vessels; an Anchor Handling Vessel (AHT); a Geotechnical Support Vessel and a re-fuelling vessel.

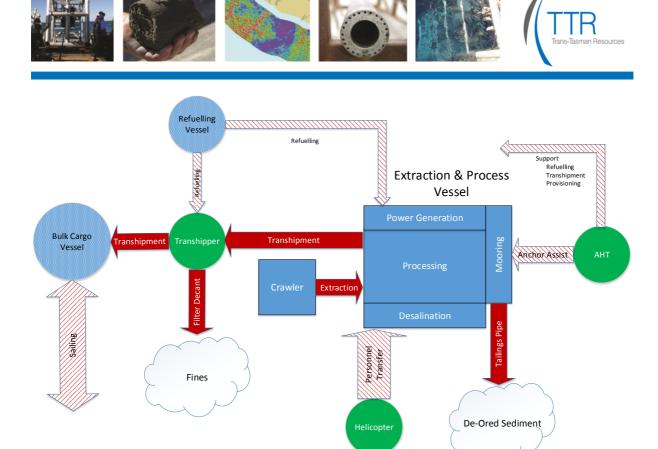


Figure 2: TTR Operational Layout

5.1 IMV (Main Extraction and Processing Vessel)

The IMV will be purposely designed to accommodate the extraction equipment (Crawlers) at the stern, with processing and utility modules integrated forward of the extraction module, above deck. It will have a weight of approximately 180,000 tonnes, a length of approximately 345m, a 60m beam and a draft design of 15m.

The IMV will provide the required storage buffer capacities for:

All extracted material removed from the seabed by the crawler (extracted sediment);
Iron sand concentrate;
Freshwater from the reverse osmosis plant (Industrial Grade); and
Fuel

The IMV will be designed to operate in the conditions experienced on the west coast of New Zealand. It will be classed for worldwide operations in accordance with the maritime class, flag and port requirements and will meet the following capability requirements:













	Station keeping and tracking during the sediment extraction operation;
	Supporting and housing the extraction system, launch and recovery system, vertical transport system and auxiliary services;
	Supporting and housing a processing plant;
	Buffering and stockpiling slurries and concentrates to allow for a continuous process;
	Continuous offloading de-ored sediment;
	Periodically offloading concentrate to a dedicated transfer vessel;
	Housing a power generation plant capable of supplying sufficient power to drive the extraction system, launch and recovery system, vertical transport system, processing plant, desalination plant, product transfer and auxiliary services;
	Providing sufficient office space and accommodation for the maritime, extraction and processing system operational staff complements; and
	Supporting helideck(s) in order to facilitate personnel transfer.
The IMV w	ill provide the platform for the following operational modules:
	Extraction (Crawler) Module;
	Beneficiation Module;
	o Screening;
	Magnetic Separation; and
	o Grinding.
	Power Generation Module; and
	Desalination Plant.

The IMV will be fitted with a 4 point, dynamic positioned winch mooring system, allowing the IMV to be continually winched on a pre-determined extraction and associated deposition pattern. The operational procedure requires the IMV to follow the extraction crawler at an average rate of 70m/hr. At this speed a 900m x 600m block will typically be worked in around 30 days. The mooring configuration has been designed to allow access by transfer vessels without interrupting the extraction or beneficiation processes.















Figure 3: The Integrated Extraction and Processing Vessel.

Iron Sand Recovery

A submerged remote controlled crawler will be launched and recovered from the stern of the IMV, which will recover iron sand from the seabed in a single pass. The crawler extracts the seafloor sediment to a predetermined depth (up to 11m) and takes the full vertical face of the extractable sediment.

The crawler is operated remotely by an operator on the IMV via an umbilical which includes a power cable, various hydraulic hoses, and a 900mm diameter delivery hose. The key features of the crawler operation are as follows:

- ☐ IMV Connection: The crawler is lowered to the seabed and raised to the IMV via a retractable deck and lift mechanism from the stern of the IMV;
- ☐ Electrical: Power demand of the crawler is up to 5MW, with supply via an umbilical. A submersible electric motor will provide power for driving the main slurry pump. The dredge pump will be directly coupled to the electric motor and like all submerged mechanical, electrical and electronic equipment, will be pressure compensated to prevent water entering the housing;
- ☐ Manoeuvring: Manoeuvring of the crawler will be achieved via two hydraulic driven tracks attached to the chassis of the machine;













- Hydraulic System: The hydraulic design will use best international practice. Flexible hoses with stainless steel fittings will be used for all connections between the valve tanks, intermediate couplings and hydraulic cylinders. Hydraulic oil will be stored on the IMV with connection via the umbilical. Marine biodegradable hydraulic oil will be used to minimise the risk of adverse environmental effects should a spill occur. Hydraulic oil pressure in all feed lines will be closely monitored with automatic shut-off equipment in the event of pressure loss; and
- Sonar Imaging: The crawler will employ imaging sonar. Utilising an array of transducers, the crawler will typically provide the operator with 120 degree constant field of vision of the underwater scene ahead.

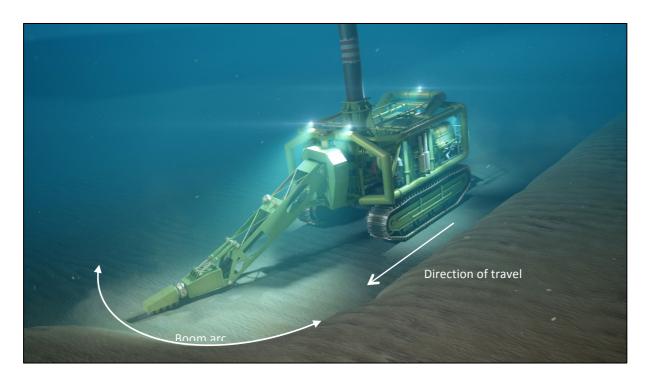


Figure 4: Crawler Operation













Sediment Processing

The production of the iron sand concentrate from the recovered sediment only involves physical separation techniques and hence no chemicals are utilised. The general processing description is as follows:

Initial Screening: The first process for the run of recovered sediment from the crawler is processed through screens, which is done to reject particles larger than 3mm. Sediment less than 3mm will then be fed under gravity to water-agitated storage tanks directly below the screen area for further processing. Oversize material will be fed via a chute to de-watering and de-ored sand handling areas, and then re-deposited on the seabed; First Stage Magnetic Separation: Sediment less than 3mm from vibrating screens will be pumped from the agitated storage tanks to the first stage of magnetic separation units (Medium Intensity Magnetic Separators or "MIMS"). This step will capture magnetic particles whilst rejecting the majority of the de-ored sand; Second Stage Magnetic Separation: Magnetic sediment from the first stage magnetic separation is passed through another set of magnetic separating units (Lower Intensity Magnetic Separators or "LIMS"). This refines the magnetic sediment whilst rejecting further non-magnetic material; Size Classification: Sediment from the second stage magnetic separation is screened into coarser sediment and finer sediment. This separation is done by a series of specialised stacked screening units, capable of dealing with the large amounts of fine sediment; Grinding: The coarser oversize sediment from size classification process is pumped to a grinding mill for the sediment to be ground into a smaller sized particle. This is done to liberate magnetic particles and improve the overall recovery of the iron sand; Final Magnetic Separation: The final magnetic separation will comprise further LIMS units to produce the final iron sand concentrate;













- Final Concentrate Handling: De-watered concentrate from the final magnetic separation process will be stored ready for transfer to the FSO. The FSO will connect to the IMV via a floating slurry pipe line and the de-watered concentrate on the IMV will be mixed with produced freshwater to form a slurry of 50% solids by weight. Freshwater is used to wash the concentrate to reduce the chloride level of the product. Once the slurry has been pumped to the FSO it will be filtered to a low moisture content using four hyperbaric pressure filters. Filtrate freshwater will be discharged to sea from the FSO; and
- □ Handling of De-Ored Sand: De-ored sand will be de-watered before disposal. Coarse and fine de-ored sand will be de-watered separately before being discharged under gravity via the de-ored sand deposition pipe. The deposition pipe will be controlled using sonar such that the discharge occurs at a constant height from the seabed. The discharge pipe will be controlled to maintain a height of 4m above the deposited de-ored sediment, this is to ensure the release of sediment into the water column is minimised.

IMV Re-Positioning

The IMV will deploy 4 standard Stevpris-type anchors, each attached directly to the IMV by 90mm diameter, tensioned steel cables and a 50-100m length of anchor chain. The anchoring system will be designed to accommodate the dynamic loads of the IMV in the prevailing weather conditions in the South Taranaki Bight.

The IMV will use a winching system on the anchor lines to continuously re-locate itself relative to the location of the crawler, which will be working 600m x 900m blocks in a predetermined sequence (see Figure 5). The IMV will follow the crawler at a typical advance rate of around 70 metres per hour.

The IMV will winch itself along in tandem with the crawler as the recovery of iron sands occurs, relying on the four anchors, which will be positioned by the Tug. The IMV will also utilise a dynamic positioning system for supplementary control.

When transiting to the next extraction block, the AHT will assist in moving anchors to new positions.













5.2 Extraction Sequencing

The recovery of sediment from the seabed will be undertaken in a planned and considered manner, with a number of factors combining to ensure maximal operational efficiency while minimising effects on the environment. Prior to recovery operations occurring, close spaced grade control drilling will be undertaken in order to understand and document any variability in the sampling and the recoverable sediment, By understanding the variability of the sediment sizes and the chemistry of the sediment, the extraction operation can be "fine-tuned" on a site-specific basis to ensure optimal performance.

The IMV will be orientated on a pre-determined section or block of the seabed. These blocks are 900m by 600m and are oriented to ensure maximum stability of the IMV with the prevailing metocean conditions. This block size is determined by the anchor mooring configuration, in that this is the maximum distance the anchor can be spread before anchor relocation would be required. Once a block is extracted the IMV and the mooring anchors are relocated into a position adjacent to the previously used extraction block so de-ored sediment can be backfilled into the previously worked area.

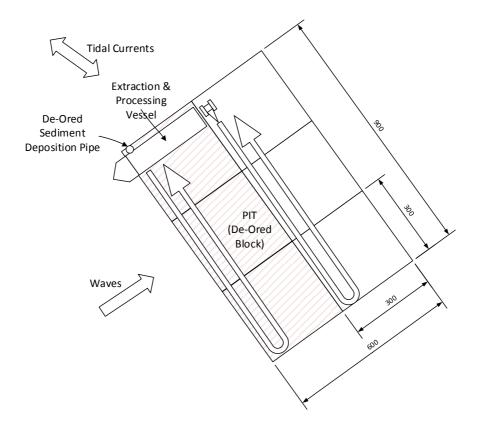


Figure 5: Extraction Sequencing













5.3 Associated Operational Activities

Grade Control Drilling and Geophysical Surveying: These operations will be undertaken by an expert geotechnical team which will be set up to undertake various pre and post extraction activities utilising specialised equipment;
Environmental Monitoring Activities: These operations will also be undertaken by the geotechnical team which will have the equipment to undertake continuous surveys such as sidescan sonar, multi-beam and the checking and servicing of environmental monitoring devices;
Anchor Handing Tug Operations: The AHT will be a used to assist the IMV when repositioning of the mooring anchors is required, as well as general resupply to the vessels, refuelling support and general support;
Trans-Shipment Activities (Ore transfer): FSO vessel will be used to transfer the iron sand concentrate from the IMV, dewater and store, and then transfer onto the larger iron sand ore carrier vessels. Trans-shipment activities will occur within the South Taranaki Bight as close as practicable to the extraction operations. In times of adverse weather events the trans-shipment of dry ore onto the ore carriers will take place in Admiralty Bay at the head of Pelorus Sound;
Fuel Transfer Operations: These are to be undertaken by a dedicated bunkering vessel which will resupply the offshore vessel with heavy fuel oil;
Re-Supply Operations: Will be undertaken by the AHT vessel; and
Crew Transfer Operation: These activities will be undertaken by helicopter, similar to servicing arrangements for the offshore petroleum industry in the Taranaki Region.













6. CONCLUDING STATEMENT

TTR intends to seek marine consent from the Environmental Protection Authority (EPA) under the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012 (EEZ Act) for the recovery of iron sand from an area of 65.76 square kilometres located outside the 12 nautical mile limit between Patea and Hawera.

TTR is committed to using world best practice to both maximise the efficiency of the sediment extraction and processing activities, while at the same time minimising any environmental effects. The company has undertaken a comprehensive design of the project, as described above, in order that these two objectives will be achieved.



TTRL OFFSHORE IRON SANDS PROJECT

SUMMARIES OF ENVIRONMENTAL ASSESSMENTS AND ASSOCIATED PEER REVIEWS













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INTRODUCTION

This report provides a summary of the assessments commissioned by Trans-Tasman Resources Limited (TTR) to understand the actual and potential environmental effects of its proposed iron sand recovery operations in the South Taranaki Bight.

TTR is intending to utilise many of the environmental assessments it previously commissioned to support its earlier application for marine consent from the Environmental Protection Agency (EPA) in 2013 / 2014. In some circumstances these reports are being updated and revised to address matters raised by the Decision-Making Committee (DMC) in its decision on TTR's previous application, and to address revisions to the sediment plume and optics modelling. As such, it is considered appropriate in this report to also document the findings of the peer reviews undertaken by the EPA in 2013/2014 and the outcomes of any joint expert conferencing sessions at the time. This information provides context on the appropriateness of the environmental assessments commissioned by TTR.

The findings of each specialist report are presented, along with the findings of EPA reviews of those reports together with the outcome of 2014 conferencing sessions that involved experts from TTR and all other parties involved with the 2014 hearing of TTR's applications.













AIR DISCHARGES

1.1 TTR Reports: Air Dispersion Modelling Study (T&T Reference 29303)

TTR commissioned Tonkin and Taylor Ltd (T&T) to assess the dispersion and effects of emissions from the combustion of Heavy Fuel Oil (HFO) from its proposed gas turbine or reciprocating engine power generation systems. This assessment was initially undertaken in August 2013, and updated by T&T in September 2015.

Discharges to air from the HFO fired gas turbines or reciprocating engines comprise combustion products, including carbon monoxide, oxides of nitrogen, sulphur dioxide and fine particulate matter. The expected emissions to air were characterised based on information provided by TTR's proposed suppliers and published emission factors. The maximum ground level concentrations of contaminants on land were predicted using air dispersion modelling and the results of the modelling were compared to appropriate air quality assessment criteria, including the National Environmental Standards for Air Quality (NESAQ).

The modelling predicted maximum ground level offshore concentrations of NO² and SO² (1 hour (99.9%) and 24 hour averages) to exceed the relevant New Zealand air quality standards and guidelines. These maxima are predicted to occur close to the Integrated Mining Vessel and are located outside the 12 nautical mile limit, where people are most unlikely to become exposed to these contaminants.

Contaminant	Time average	Maximum Ground Level Concentration (μg/m³)		Air assessment criterion (μg/m³)
		Offshore	Onshore	
Particulate matter (PM ₁₀)	24 hour Annual	4.4 0.14	0.6 0.024	50 20
Nitrogen dioxide	1 hour (99.9%)	313 160	60	200 (9 exceedance allow per 12 months) 100
	Annual	5.3	0.9	40
Sulphur dioxide	1 hour (99.9%)	453	87	350 (9 exceedances allow per 12 months) 570 (not to exceed)
	24 hour	231	31	120 (20*)
Carbon monoxide	1 hour (99.9%) 8 hour	75 67	14 12	30,000 10,000













1.1.1 EPA Review Findings

The EPA engaged Sinclair Knight Merz (SKM) to carry out an independent technical review of the T&T assessment.

The SKM review found that the T&T assessment provided a concise and comprehensive assessment of the effects of the air discharges. The SKM review found that T&T has used conservative assumptions in some cases (assuming all NO_X as NO^2), and used maximum expected conservative sulphur contents in fuel, as well as assuming maximum continuous emissions over the year which provided conservatism to the assessment, particularly for the longer term.

The SKM review further found that the predicted onshore emission concentrations were well below the assessment criteria, so any further refinement of emission rates would not be necessary.

1.1.2 Joint Expert Conferencing Results

A teleconference was held between experts on air quality and health effects on 19 March 2014.

The experts noted that the T&T modelling predicted that the air concentrations of sulphur dioxide exceeded the ambient air quality standards (AAQS) at the Kupe platform, but also noted that the air concentrations were within the NZ Workplace Exposure Standards. As such, the modelled concentrations were not significant with regards to air quality or health effects.

With respect to exposure of recreational users to generated emissions, the experts found that although the dispersion modelling showed that the AAQS for sulphur dioxide would be exceeded in certain areas the predicted concentrations were not at levels that would cause adverse health effects.

The experts considered it appropriate to include a requirement for a condition that would limit the sulphur content of the fuel. All air quality and health effects assessments were based on a sulphur content of 3.5 %w/w (by weight) and therefore this was considered an appropriate limit.













ARCHAEOLOGICAL

1.2 TTR Report: Archaeological Assessment (Clough & Associates Ltd)

TTR engaged Clough & Associates Ltd in August 2013 to assess the potential for the discovery of historic shipwreck sites within the proposed area of operations.

Clough & Associates (2013) review of NIWA's multi-beam sonar data found that there is no significant wreckage exposed above the seabed in the project area, although it is still possible that wreckage could be encountered buried beneath the seabed. They also concluded that additional archaeological monitoring of iron sand recovery operations in the project area would not be necessary.

Should a shipwreck be encountered during iron sand recovery operations, Clough & Associates (2013) recommended the following procedures be implemented:

- □ Should a number of finds be found in a discrete area, or substantially intact wreckage encountered, efforts would be made to identify what it is and its likely age. In the first instance photographs and a description of the find would be sent to a consultant archaeologist for identification;
- □ Work would cease in the immediate area while the find is identified. If the wreckage is not a legally protected archaeological site (post-dating 1900), a record should be made of the find and works can resume;
- ☐ If the finds are confirmed as being a legally protected archaeological site (pre-dating 1900), it will be necessary to contact the New Zealand Historic Places Trust Regional Archaeologist in the first instance and obtain an archaeological authority from the New Zealand Historic Places Trust before works affecting the site can proceed. This is a legal requirement under the Historic Places Act 1993.

1.2.1 EPA Review Findings

Clough & Associates (2013) was not peer reviewed by independent specialists on behalf of the EPA. The findings of the assessment were accepted by all parties at the 2014 hearing.

1.2.2 Joint Expert Conferencing Results

Clough & Associates (2013) was not subject to expert conferencing. The findings of the assessment were accepted by all parties at the 2014 hearing.













BASELINE ENVIRONMENTAL REPORT

1.3 TTR Report: South Taranaki Bight Factual Baseline Environment Report (MacDiarmid et al. 2011)

TTR commissioned NIWA in 2010 to undertake phased bio-geophysical research in the South Taranaki Bight, focused on collecting and presenting data from existing sources presenting the existing conditions of the following elements:

	Derivation of wave climate information and tidal patterns for the region from existing
	models and databases;
	Undertaking a geomorphologic analysis of stability and history of adjacent shore;
	Characterisation of the ecology of the region including a synthesis of information about rare
	and endangered species; and
П	Characterisation of the fisheries of the region.

With regards to the wave climate and tidal patterns for the South Taranaki Bight, the data shows a seasonal variation in wave heights, with the highest waves on average occurring in August and September. In storm conditions, significant wave heights of order 8m can occur, particularly in the winter and early spring. Peak wave periods are most commonly in the range 10-14 seconds.

While not quite as strong as tidal flows through Cook Strait proper, tidal currents of up to 0.4m/s occur in the relatively shallow waters off Patea and smaller (with peak speeds less than 0.1m/s) in nearshore waters between Wanganui and Foxton.

It is likely that shoreline processes will continue to be driven by geology and climate cycles. The South Taranaki Bight is dominated by eroding volcanic and sedimentary cliffs and dynamic river mouths. South of Whangaehu River the shoreline is dominated by dunes, backed by sand country, which are likely extending due to windblown sand. Rivers and estuaries also feature in this area and cause the shoreline to move back and forth over long time periods.

The available information indicates that the South Taranaki Bight is biologically productive in terms of meso (midsized) zooplankton. Biomass estimates are among the highest recorded compared to other coastal regions around New Zealand. The mesozooplankton species composition is strongly influenced by the physical oceanography of the region, including both the upwelling events off Cape Farewell and the D'Urville current.













The data indicates that the benthic fauna in the South Taranaki Bight is generally species poor, with a low abundance of benthic organisms in both subtidal and intertidal zones when compared to other coastal areas of New Zealand. Benthic species richness and abundance are particularly low in sandy habitats which may be due to the high energy environment and frequent seabed resuspension resulting in very mobile sediments, sand inundation of reefs, sand scouring of reef habitats and sustained high water turbidity in nearshore areas. Species numbers and diversity tend to increase towards the shore, with the highest numbers in the nearshore area.

A productive zone for invertebrates in the southwest of the study area is evident where high wet weights of squid, octopus and decapods (crabs, shrimps etc.) have been recorded. This offshore productive zone is most likely due to the influence of the cold, nutrient-rich water that originates from the upwelling zone off Cape Farewell and the Kahurangi shoals.

No nationally endangered or at-risk benthic macrofaunal species were found to be present within the area. However, the Waitotara estuary, Waiinu reef, Waverley Beach, North and South Traps, Whenuakura estuary and Whanganui river estuary are all identified as being "outstanding natural areas" in the Taranaki Regional Coastal Plan 1997.

The South Taranaki Bight has a moderately diverse reef fish fauna with only 38 species predicted to occur on reefs within SCUBA diving depth range (30m). Two species, black angelfish and common roughy, are predicted to be rare in the region, occurring at low abundance at just a few coastal reefs.

Six other species have restricted distributions, predicted to occur at <50% of the reef sites in the region. All other 29 species are predicted to be much more widespread and either occur in low abundance throughout the region (14 species), are moderately common over the entire area (13 species), or are abundant widely-distributed species (2 species).

Fifty-one species of demersal fish occur in the South Taranaki Bight. The richness of this assemblage is moderate on a New Zealand wide scale, with on average 12-16 species likely to occur within a standard research tow.

Species with distributions along the South Taranaki coastline that coincide with areas of interest to TTR include anchovy, blue cod, eagle rays, red gurnard, golden mackerel, leather jacket, lemon sole, snapper, rig and trevally.

The South Taranaki Bight supports a relatively modest seabird assemblage. Many of the species occurring in the area are likely to be relatively coastal in their distributions. Such species include blue penguin, shags, gulls and terns, although these latter taxa can extend to more offshore areas.

The area does not support large breeding colonies for any species but a number of coastal estuarine sites are of significant value to coastal, shore, wading, and migratory bird species. These include the Waikirikiri Lagoon and the Whanganui, Whangaehu, Turakina, Manawatu and Rangitikei River estuaries.













Commercial fishing operations within the South Taranaki Bight have been dominated in recent years by three main fishing methods, bottom trawling (for a variety of species), midwater trawling (mainly for jack mackerel), and set netting (mainly for rig, blue warehou and school shark). Together these methods have accounted for 95% of all fishing events recorded with position data, between 1 October 2004 and mid-July 2010. The highest levels of fishing effort (mainly bottom trawling and set netting) were just offshore between New Plymouth and Cape Egmont, and near the 50 m contour between Hawera and Whanganui. Fishing effort of all methods occurred throughout the year, but there was a concentration of midwater trawling effort in early summer.

1.3.1 EPA Review Findings

The EPA engaged SKM to carry out a number of independent technical reviews that included the review of the NIWA baseline environment report. The SKM reviews all found that the baseline environment report presented the best available information.

1.3.2 Joint Expert Conferencing Results

The NIWA 2011 Baseline Report was not subject to expert conferencing. The findings were accepted by all parties at the 2014 hearing.













BATHYMETRY SIDE-SCAN & SEISMIC REPORTS

1.4 TTR Report: Multibeam Survey in Southern Taranaki Bight (Pallentin et al. 2013)

TTR contracted NIWA in 2012 to conduct a multi-beam bathymetry survey of the South Taranaki Bight.

The depth range and seafloor morphology of the area varied widely. The shallowest measured depth was just under 10m water depth at the end of the Wanganui outfall pipeline, the deepest in the planned IMV mooring site area with just under 80m water depth. The only notable feature, outside of the known nearshore rocky systems, was a field of what appeared to be outcrops, rising 1-5m above the seafloor, west of the Traps.

1.4.1 EPA Review Findings

The EPA engaged SKM to undertaken a review of the technical assessments relation to oceanographic processes and the physical environment, including Pallentin et al. 2013. SKM noted that the majority of the material provided about the physical environment by TTR is comprehensive and makes use of the best available information. With respect to Pallentin et al. 2013, SKM noted that it represented a routine technical data report and covered the entire proposed project area.

1.4.2 Joint Expert Conferencing Results

For the 2014 hearing, conferencing on bathymetry and oceanographic processes took place on 20 March 2014. The experts agreed that the oceanographic measurements by TTR are fit for purpose and to international standard. They also agreed there were no areas of uncertainty beyond the normal measurement error and natural variation implicit in any field measurements.

1.5 TTR Report: High-resolution Boomer Survey in South Taranaki Bight 2nd Survey (Woelz and Wilcox 2013)

TTR contracted NIWA in 2013 to run a set of 20 seismic lines using a Boomer system to help understand the geometry of the sedimentary wedge in the South Taranaki Bight within which iron sand-rich deposits occur. A short factual report was provided.

1.5.1 EPA Review Findings

The EPA engaged SKM to undertake a review of the technical assessments in relation to oceanographic processes and the physical environment, including Woelz and Wilcox (2013). SKM noted that Woelz and Wilcox (2013) was a routine technical data report, but that the survey did not cover the proposed project area (they stated that it refers to previous survey that does cover the project area).













1.5.2 Joint Expert Conferencing Results

Woelz and Wilcox (2013) was not subject to expert conferencing. The factual findings of the survey were accepted by all parties at the 2014 hearing.

1.6 TTR Report: Sidescan Survey of South Taranaki Bight Sediments (Gerring et al. - 2012)

A sidescan survey was undertaken off the South Taranaki coast by NIWA in 2012 in order to attempt to identify the extent of bryozoans and sponges within an area being considered at the time for the disposal of dredge spoil from the iron sand recovery operations. The project no longer involves the use of a dump site as initially envisaged when the sidescan survey was commissioned. However, the data regarding the extent of bryozoans and sponges on the seabed remains valid.

The sidescan images were verified using underwater photographs and maps were generated showing the extent of the bryozoan - sponge habitat in relation to the proposed spoil disposal site.

The sidescan study indicated a large area of biogenic-dominated habitat predominately on the south-eastern part of the study area in water depths of 70–90m. Bryozoans and sponges form scattered clumps over the whole of this area, with clump height (estimated maximum height 250–300m) and occurrence decreasing gradually to the west until the sea-floor substrate can be reclassified as muddy sand with bryozoan and/or shell fragments. Further inshore, towards the outer iron sand recovery area, there are extensive areas of dark fine sand with shell fragments. Large sand waves seen in the more northern parts of the study area are possibly generated and maintained by currents that occur during westerly and south-westerly storms. However, it is also possible that these sand waves were formed during the last post-glacial sea-level rise. Almost all of the remainder of the area covered in the survey is described as being gravelly mud, up to 1–3m thick (from previous studies).

1.6.1 EPA Review Findings

The EPA engaged SKM to undertaken a review of the technical assessments relation to oceanographic processes and the physical environment, including Gerring et al. (2013). SKM noted that Gerring et al. (2013) was a routine technical data report, although the coverage of the project area was not comprehensive.

1.6.2 Joint Expert Conferencing Results

Gerring et al. (2012) was not subject to expert conferencing. The findings of the survey were accepted by all parties at the 2014 hearing.













BENTHIC STUDIES

TTR engaged NIWA in 2013 to survey and describe the benthic flora and fauna within the South Taranaki Bight.

1.7 TTR Report: Benthic Habitats, Macrobenthos and Surficial Sediments of the Nearshore South Taranaki Bight (Anderson et al. 2013)

Seabed sampling of the nearshore region of the South Taranaki Bight was conducted during February and March 2013. Seabed habitats were characterised using underwater video footage and still images. Representative habitats were then sampled using a benthic grab for surficial sediments (surface sediments) and a benthic dredge to collect surficial macrobenthic specimens.

Both soft-sediment and rocky outcrop habitats were recorded within the nearshore region of the South Taranaki Bight. The exposed areas in the north and central regions of the South Taranaki Bight were characterised by well-sorted fine sands in dynamic rippled bedforms, while the more protected southern sites were characterised by flat or subtly rippled bedforms with higher proportions of mud. The amount of shell debris associated with soft-sediment habitats also increased offshore, with coarse-shell debris habitats recorded in water depths greater than 20m.

Two types of rocky outcrops were recorded. Hard rock outcrops of low to moderate relief were recorded at three sites in the northern sections of the South Taranaki Bight in water depths of 12-22m, while two mudstone outcrops were recorded: one south of Hawera as a low-lying outcrop at 14 m and another offshore of Whanganui as a moderate relief outcrop at 13.5m.

Video observations of the seabed along with dredge collections at representative sites found that most soft-sediment sites supported very low numbers of surficial macrobenthos. These assemblages were characterised by deposit feeders, predators/scavengers and suspension feeders.

Rocky outcrops, which represent 8% of available habitats, supported much more abundant and diverse macrobenthic assemblages. These assemblages were characterised by bryozoans, macroalgae and sponges, as well as more motile species, such as crabs, amphipods, starfish, brittle stars, gastropods and polychaetes worms. In contrast to mudstone outcrops, which supported low or negligible amounts of macrobenthos, hard rock outcrops accounted for more than 25% of all specimens and 61% of all species collected during the survey.

No records of new species were found.













1.8 TTR Report: Benthic Flora and Fauna of the Patea Shoals Region, South Taranaki Bight (Beaumont et al. 2013)

This survey concentrated on an area of seabed known as Patea Shoals, approximately 25-40km offshore in water depths of 25-45m. As part of this study, NIWA was also contracted by TTR to experimentally compare the recolonisation of iron rich and de-ored sediments by benthic organisms.

The most common habitat observed was rippled sands, which occurred across most of the area in depths of 15-50m. Areas of the seabed were characterised by worm communities, termed 'wormfield' habitats. These habitats were dominated by the infaunal tubeworm, Euchone sp A, which live in the upper sediments where they bind sediments together to form their tubes, and can occur in high but patchy densities. Overall, inner and mid-shelf habitats supported very few visible epifauna.

In deeper areas offshore, the seabed was characterised by two types of low-relief biogenic habitat: bivalve rubble and bryozoan rubble. Bivalve rubble were characterised by the large robust dog cockle Tucetona laticostata, both living buried in the sediments and with relict shells that have accumulated on the surface of the seabed. Live T. laticostata were recorded in water depths of 26-83.5m, while the shell debris of this species – that formed the dominant biogenic structure in deeper offshore areas - occurred within a much narrow depth contour (44-69m depths). In deeper zones (>60m), bryozoan rubble combined with more generic shell debris became the dominant habitat type. These biogenic habitats both supported diverse benthic assemblages dominated by sessile suspension-feeding taxa (e.g. bryozoa, sponges, colonial ascidians, brachiopods and epiphytic bivalves), and in turn provide structure to a plethora of motile species (e.g. crabs, ophiuroids, holothurians, gastropods, and nudibranchs).

The re-colonisation experiment was carried out at two sites (Mahanga Bay and Evans Bay) within Wellington Harbour. At each site, three replicates of each of three experimental treatments were deployed, using treatments of high-iron, medium-iron and low-iron (de-ored sand) concentrations. The sand used in the experiment was collected from within the proposed project area. The concentration of Vanadium Titano-Magnetite in the surface sediments appears to play an insignificant role in structuring marine benthic communities in the study area. This is further supported by results of the recolonisation experiment which showed that the concentration of iron in sediments was not a key driving factor in the re-colonisation of soft-sediment (sandy) communities at either of the Wellington Harbour study sites.

Overall, there was no evidence within the data to suggest that the proposed extraction of de-ored sand deposit areas are "unique" with respect to macrofauna collected/observed during the survey. Importantly, neither the video observations, dredges, sediment cores nor the recolonisation experiment showed a significant relationship between iron concentration and community structure.













1.8.1 EPA Review Findings

The EPA engaged SKM to undertake an independent review of the benthic studies.

The findings of the SKM benthic review were:

- ☐ That the benthic studies were significant additions to the current knowledge of benthic communities in the South Taranaki Bight and, as such represented the best available information; and
- ☐ That the results of Beaumont et al. (2013) demonstrated that there were no differences between benthic communities in the proposed iron sand recovery area and adjacent communities in similar habitats.

The main criticisms of the benthic studies focussed on the lack of information regarding the North and South Traps, two high-relief rocky reef systems located six kilometres off Patea, and the failure of the studies to relate predicted changes in suspended sediment concentration and sediment deposition to consequent changes in the availability of light to light-dependent benthos, and potential impacts.

1.8.2 Joint Expert Conferencing Results

As part of the first hearing, conferencing of experts on the effects on benthic ecology took place over two days in March 2014.

The experts considered the following aspects concerning the effects on benthic ecology:

Methodological adequacy to support evidence-based decision making;
Levels of uncertainty around predicted effects;
Acute and chronic effects of the sediment plume and sedimentation on benthic ecology;
Effects of shading on primary productivity;
Effects of the sediment plume and sedimentation on offshore biogenic habitats and other
potentially sensitive receptors;
Factors affecting recovery of infauna and epifauna assemblages post iron sand recovery
activities;
Benthic habitats and significance of inshore reef areas located down current from mining
site (e.g., the North and South Traps and Graham Bank);
Sensitivity of <i>Ecklonia</i> and other reef assemblages to the predicted reductions in incident
light (and relevance of thresholds);
Concentration of metals and hypersaline brine in water discharges from the plant and
dilution required to meet ANZECC/ARMCANZ guidelines;
Is there any knowledge of freshwater springs in the application area? If so, what is the likely
effect on them?; and
Environmental monitoring:













- Objectives;
- Baseline monitoring-duration pre-activities;
- Relative utility and applicability of trigger level/thresholds-based or other environmental monitoring approaches; and
- o Parameters, frequency, locations to monitor.

With regards to the methodological adequacy to support evidence-based decision making the experts agreed that:

	The benthic ecology surveys undertaken were spatially intensive and provided large
	amounts of information on the types of habitats, as well as the epifaunal and infaunal
	animals and plants present. However they do not provide any information on the temporal variability in this system;
	That temporal sampling was required to determine seasonal variability as part of a baseline monitoring survey;
	That 1-2 years of temporal monitoring was required as part of a baseline monitoring survey; and
	That a baseline monitoring program should be part of consent conditions.
Regard	ling levels of uncertainty around predicted effects, the experts found that:
	With the removal of the magnetite the chemical and physical structure of the depositional

- sediments will be altered within the iron sand recovery area;
- ☐ Mining activities will result in near total mortality of benthic fauna within the iron sand recovery area;
- □ Re-deposited sediment would be similar in sediment grain size to pre-mined sediments. The experts agreed that this would need to be measured at periods following iron sand recovery, with the frequency of monitoring of sediment grain size, especially of surficial sediments, being agreed prior to any operations occurring;
- Redox (reduction-oxidation potential, a measure of oxygen availability) measurements are likely to be important to recolonising organisms and that redox levels should be measured as part of ongoing monitoring surveys; and
- ☐ There is uncertainty in the rate of recovery of mined areas.

With regards to the effects of shading on primary productivity, the experts concluded that light modelling should not be taken as a reliable indicator of benthic primary production. Pelagic primary production is likely more important within the area than benthic primary production.

With regards to the effects of the sediment plume and sedimentation on offshore biogenic habitats and other potentially sensitive receptors the experts agreed that:













	Deposition of extraction derived sediments are unlikely to have an impact on the offshore communities in biogenic habitats; and
	There will be little effect on species (relating to choking) and the area is unlikely to be affected.
_	gards to the recovery of infauna and epifauna assemblages post the iron sand recovery , the experts came to the conclusion that:
C	The recovery of benthic ecosystems within the directly impacted mining area is in the order of a decade where mining has moved on from an area; and
	Recovery refers to the restoration of the ecological functional roles of the area. Dr Huber and Dr McClary agreed that some recovery will occur on shorter time scales.
rom the	gards to the benthic habitats and significance of inshore reef areas located down current proposed iron sand recovery area (e.g., the North and South Traps and Graham Bank), the agreed that:
C	The North and South Traps are beyond the primary area regularly exposed to elevated concentrations of mining-derived suspended sediments, so are unlikely to be affected by the activities; and
ā	Due to their regional significance as having outstanding coastal value, these areas (the North and South Traps and Graham Bank) should be monitored to detect potential effects of the activities.
_	ards to the sensitivity of ecklonia and other reef assemblages to the predicted reductions in light (and relevance of thresholds) the experts agreed that:
	Mining derived sediment is not expected to have an additional effect on these rocky reef communities; and
	The North and South Traps should be monitored.
_	gards to the concentration of metals and hypersaline brine in water discharges from the lant and dilution required to meet ANZECC/ARMCANZ guidelines, the experts agreed that:
	Concentrations of nickel and copper in the discharged seawater were unlikely to negatively affect any re-colonisation of the seafloor; and
□ (On a recommendation to include analyses of mercury in TTR's water quality monitoring program until the expectation that the extracted sediment will not release mercury is confirmed.













CETACEAN SURVEY AND HABITAT MODELLING

1.9 TTR Report: Habitat Models of Southern Right Whales, Hector's Dolphin, and Killer Whales in New Zealand (Torres et al. 2013)

The proposed iron sand recovery activities will affect the seafloor community at the extraction sites, while the sediment plume associated with the discharge of sediment back to the seabed has the potential to affect pelagic and benthic ecosystems downstream. Cetaceans (whales and dolphins), as important high level predators in marine systems, may be impacted by these activities.

A preliminary assessment of cetacean distribution in the South Taranaki Bight identified the presence of three endangered species: southern right whales, Hector's dolphins (Cephalorhynchus hectori and the sub-species Maui's dolphin C.H. Maui), and killer whales.

The study found that the proposed project area in the South Taranaki Bight appears to be of low suitability for all three species of cetaceans. Areas of increased habitat suitability for Hector's dolphins and southern right whales lie close inshore and may be increasingly used as the New Zealand populations of these species recover. An area of average to above average habitat suitability for killer whales begins approximately 8km seaward of the proposed project area.

1.10 TTR Report: Cetacean Monitoring Report (Martin Crawthorn Associates 2013)

TTR engaged Martin Crawthorn Associates Ltd in 2013 to conduct a cetacean survey of the distribution of cetacean across a large proportion of the South Taranaki Bight, including the proposed iron sand recovery area. The survey area was designed to cover TTR's "initial" area for iron sand recovery areas - which extended offshore from approximately Manaia in the north-west to between Patea and Waverley in the south-east.

The key results of the survey were as follows:

A pod of common dolphin (6-8) was observed in the October 2012 survey within the project area;
Very low densities of fur seals were observed between July 2011 and June 2013 on transects all outside of the project area, closer to shore;
A variety of other fauna were also observed including seabirds, fish (usually mullet or kahawai) and sharks; and
A total of approximately 4,550nm (or 8,426 km) of transect was flown to date which equates to approximately 7,300nm ² (or 25,040km ²).

Overall, the assessment concluded that the abundance of marine cetaceans within the project area is very low.













1.10.1 EPA Review Findings

The EPA engaged SKM to carry out an independent review of the technical reports related to marine mammals and fish.

The SKM review found that the approach employed within the habitat model was reasonable in order to identify some key species for consideration, although the potential for other cetacean species to be present in the area should be acknowledged.

Despite some gaps within the report (i.e. humpback whale seasonal migration routes and the possibility of beaked whale presence), the SKM review concluded that considering data from sightings, modelling and field surveys there is a very low abundance of cetaceans in the project area.

1.10.2 Joint Expert Conferencing Results

As part of the first hearing, conferencing of experts on the field of effects on marine mammals including noise took place in March 2014. As part of this joint expert conference the following issues regarding the conducted surveys and habitat modelling were discussed:

Presence of marine mammals in the proposed project area and broader area; and
Status/significance of the project area for marine mammals (e.g. feeding, migrating).

The experts agreed a species by species approach was appropriate when considering the presence of marine mammals in the project area and broader area.

The experts agreed that all species reported in the South Taranaki Bight Factual Baseline Environmental Report (MacDiarmid et al. 2011) (i.e. Hector's dolphin, southern right whale, killer whale, Maui's dolphin, blue whales, bottlenose dolphins, common dolphins, dusky dolphins, false killer whales, fin whales, humpback whales, minke whales, pilot whales, sei whales, sperm whales and NZ fur seals) could occur within the proposed iron sand recovery area.

The experts concluded that the south Taranaki coast is considered to be part of the historic natural range for Maui's dolphins, and is on the margins of their current range. While most records and sightings of Maui's dolphins are between the Kaipara Harbour and Raglan, Maui's dolphins have been recorded as far south as Whanganui with their relative density decreasing southward of Cape Egmont. Hector's dolphins have also been recorded in the South Taranaki Bight area but very rarely.













With regards to whales the experts agreed that:

Killer whale groups are likely to be transitory through the South Taranaki Bight;
Blue whale sightings mainly occurred in the general vicinity of the 100m depth contour with
very few sightings inshore;
The proposed iron sand recovery area may represent the edge of the blue whale feeding
area, but feeding may still extend into the project area on occasion;
The experts agreed that beaked whales are generally found in deep water with feeding
typically occurring below 200m. Therefore, beaked whales are unlikely to be found in the
project area or in waters less than 200m deep;
Sperm whales are generally found in deep water like beaked whales;
Humpback whales are likely be seasonally present in the South Taranaki Bight;
Southern right whales are likely to be present in the South Taranaki Bight area seasonally
and travel through in low numbers;
Pilot and false killer whales may use the South Taranaki Bight, particularly over the summer
months;
Common dolphins are widespread around the South Taranaki Bight; and
New Zealand fur seals are found in the South Taranaki Bight year round.













COASTAL STABILITY

1.11 TTR Report: Coastal stability in the South Taranaki Bight - Phase 2 Potential Effects of Offshore Sand Extraction on Physical Drivers and Coastal Stability (Hume et al. 2013)

TTR engaged NIWA in 2013 to assess the potential effects of the proposed iron sand recovery activities on physical drivers and coastal stability. The report made an assessment of the effects of sand extraction on the landforms and geomorphic character of the shore, physical drivers (waves and currents) of coastal processes, sediment processes and coastal stability, and was based on studies made of the natural landforms and geomorphic character along the 140km long stretch of coast between Opunake and Whanganui.

The key findings were summarised as follows:

The natural landforms and geomorphic character of the beaches is unlikely to change due to
the recovery of iron sand. Geomorphic character of the beaches is determined by
environmental setting, tide range, grain size and wave climate;
Public access to the marine environment will not be adversely affected;
There will be no adverse effects from the deposition of substances to the seabed;
The recovery of iron sand will not adversely affect physical drivers and processes that cause
coastal change; and
Effects on the risk of accelerated coastal erosion and accretion along the region's coastline
and modification to natural hazard processes will not be significant.

1.11.1 EPA Review Findings

The EPA commissioned SKM to undertake a review of Hume et al. (2013). SKM agreed with the factual description contained in Hume et al. (2013) and agreed with the assessment that the impacts of iron sand recovery activities on the physical environment (including oceanographic and coastal processes) are likely to be minor. The SKM review noted that the significant distance of the project area offshore from the coast, and the depth of water, act to separate the influence of iron sand recovery from physical processes affecting the coastal zone, with only minor changes predicted to occur.













1.11.2 Joint Expert Conferencing Results

As part of the 2014 hearing, conferencing of coastal stability experts took place on 18 March 2014. This joint expert conference endorsed the methodology adopted for, and factual information in, Hume et al. (2013). It also agreed that NIWA's hydrodynamic and wave modelling used to generate inputs to the assessment of potential physical and coastal effects were consistent with international practice and appropriate.

The experts identified some uncertainty, albeit small, in relation to the pathways and magnitude of cross-shore sediment transport on the inner shelf, and agreed that it would be prudent to undertake further modelling/analysis to quantify the magnitude and patterns of cross-shore sediment transport on the inner shelf.

Overall, the experts agreed that sediment supply from the project area to beaches to the southeast is likely to be small, that changes to nearshore wave characteristics due to operations would be much smaller than natural variability in wave conditions, and that changes in wave energy incident on the coastline are unlikely to induce measurable changes in erosion and accretion patterns on the beaches.













EFFECT OF SHIPS LIGHTS

1.12 TTR Report: Effects of Ships Lights on Fish, Squid and Seabirds (Thompson 2013)

TTR engaged NIWA in 2013 to assess the potential effects of ships lights on fish, squid and seabirds. The report drew upon the published literature to consider the effects of nocturnal artificial light on fish, squid and seabirds, taking into account the likely light regime on the Integrated Mining Vessel.

Overall, artificial nocturnal light generally attracts all three groups of marine animals to a certain extent. The attractiveness of light is not universal across these marine species. For example, the majority of diurnally-active seabirds appear not to exhibit marked attraction to artificial light, whereas light can potentially be a problem for nocturnal species.

For fish and squid, any effects of the vessel as a source of artificial nocturnal light are likely to be very localised and centred on the vessel itself. Some species of both groups could potentially aggregate in the water column close to the vessel, but these effects are highly unlikely to have any measurable population level impact on the attracted species.

Similarly for seabirds it is possible that the vessel's lights may attract nocturnal species, particularly in poor weather, but the remoteness of the area of operation from major seabird breeding colonies and relatively standard mitigation protocols would also suggest that any effect would be highly unlikely to have any measurable population level impact on the attracted seabird species.

1.12.1 EPA Review Findings

The EPA commissioned a review by Mitchell Partnerships Limited, which found that the anticipated effects on seabirds using the area described in Thompson (2013) had not considered any impacts due to reductions in food supply or the potential for reduced foraging success in turbid waters. The review concluded that Thompson (2013) did not contain sufficient detail to enable the EPA to understand the effects of the activity on the environment. The review also noted that no monitoring of seabirds was proposed, and therefore an adaptive management approach was precluded, unless a suitable monitoring regime can be devised. Mitchell Partnerships Limited concluded that additional information was required to allow a full and thorough understanding of the existing environment and the effects of the proposal in respect of seabirds.













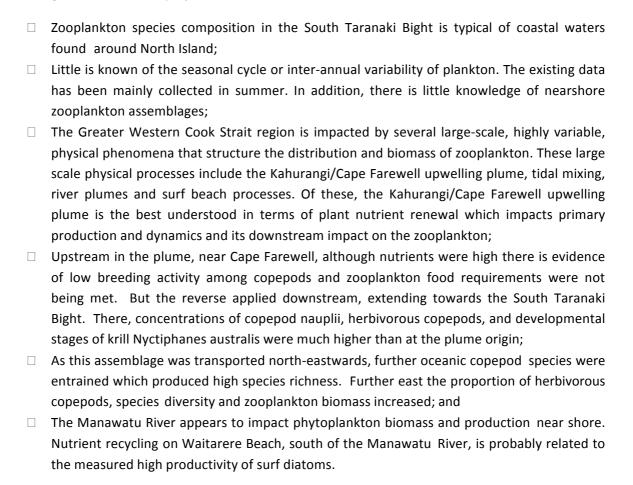
1.12.2 Joint Expert Conferencing Results

As part of the 2014 hearing, conferencing of seabird experts took place on 20 March 2014. The experts agreed that lighting was potentially the biggest issue with respect to effects on birds. They agreed that a detailed lighting risk mitigation plan should be developed and imposed as a condition of consent, along with monitoring and review conditions.

ZOOPLANKTON

1.13 TTR Report: Zooplankton and the Processes Supporting them in Greater Western Cook Strait (Bradford-Grieve and Stevens 2013)

Bradford-Grieve and Stevens (2013) reviewed available information about the zooplankton, and the processes supporting it, in the Greater Western Cook Straight (including the South Taranaki Bight, Tasman and Golden Bays, and bounded by Cook Strait Narrows), as this larger area influences zooplankton populations in the South Taranaki Bight. In summary, the review indicated the following in relation to the project:















In her evidence which, was reviewed by the Joint Expert Conference on Zooplankton, Dr Janet Grieve the lead author of Bradford-Grieve and Stevens (2013), concluded that near-surface living zooplankton by their very nature are adapted to an environment that is disturbed. That is, in general, zooplankton must be able to function in surface waters that seasonally mix deeply in winter and be able to survive over winter in a low food environment. In addition, at some locations, environmental disturbance occurs naturally through processes such as upwelling of deep water, strong vertical mixing caused by tidal currents in shallow water, or strong mixing caused by the grounding of surface waves close to shore. Therefore, it is considered that zooplankton populations are able to recover from strong, naturally occurring disturbance.

Dr Grieve concluded that it would be highly unlikely that one could distinguish between the impact of additional disturbance from any recovery of iron sands and the already existing, multiple sources of natural disturbance occurring in the greater South Taranaki Bight.

1.13.1 EPA Review Findings

EPA commissioned SKM to undertake a review of Bradford-Grieve and Stevens (2013), along with assessments on marine mammals, fish and squid. The SKM review agreed that zooplankton communities of the South Taranaki Bight are typical of those in coastal waters across the North Island, and that factors influencing zooplankton in the region are highly variable.

The SKM review concluded that proposed iron sand recovery activities will result in increased suspended sediment concentrations within the water column, which is unlikely to cause impacts on zooplankton other than at a localised scale of hundreds of metres from the iron sand recovery activities. The ecological significance of such effects was considered by SKM to be minor, given the vast area of habitats in the coastal regions to the north, which will not be affected by the mining activity.

1.13.2 Joint Expert Conferencing Results

For the 2014 hearing, conferencing of fish and zooplankton experts took place on 20 March 2014. All experts agreed with the outcomes and facts on zooplankton provided in the Statement of Evidence in Chief of Janet Grieve as set out above.

The experts also agreed that conditions that require the monitoring of zooplankton were not necessary.













SEABIRDS

1.14 TTR Report Seabirds of the South Taranaki Bight (Thompson 2013)

TTR engaged NIWA in 2013 to assess the potential effects of the proposed iron sand recovery activities on seabirds in the South Taranaki Bight.

The South Taranaki Bight supports a relatively modest seabird assemblage, but detailed, systematic and quantitative information on the at-sea distribution of virtually all species is currently lacking. Many of the species occurring in the area are likely to be relatively coastal in their distributions. Such species include blue penguin, shags, gulls and terns, although these latter two taxa can extend to more offshore areas.

By contrast, and although some species have been observed from and relatively close to the coast, albatross and petrel species tend to be more pelagic and wide-ranging in their distributions and will likely occur anywhere throughout the area. The area does not support large breeding colonies for any species but a number of coastal estuarine sites are of significant value to coastal, shore, wading, and migratory bird species. These include the Waikirikiri Lagoon and the Whanganui, Whangaehu, Turakina, Manawatu and Rangitikei River estuaries.

1.14.1 EPA Review Findings

Mitchell Partnerships Limited was commissioned by the EPA to undertake a review of Thompson (2013). The review found that Thompson (2013) could have made better use of the available information to inform their assessment, and that Thompson (2013) did not adequately describe the current state of the affected area in sufficient detail to enable the EPA to understand the relative importance (or otherwise) of the existing environment and the nature of the effects of the activity.

Mitchell Partnerships Limited concluded that additional information was required to allow a full and thorough understanding of the existing environment and the effects of the proposal in respect of birds.

1.14.2 Joint Expert Conferencing Results

As part of the 2014 hearing, conferencing of seabird experts took place on 20 March 2014. This joint expert conference reviewed both of NIWA's bird reports, and agreed that reports and information provided to the EPA for the hearing were an adequate summary of what is known to date on the South Taranaki Bight area for seabirds. However, the experts agreed that there was not enough evidence to conclude that the area was of importance or was not of importance to seabirds.













The experts agreed that the South Taranaki Bight could be on the migratory route of several New Zealand seabird species (e.g. the Sooty Shearwater and Hutton's Shearwater). However, the amount of time that these species spend in the area was unknown. The ability of these species to move their migration route was also unknown. The experts accepted that the South Taranaki Bight is of lesser importance than the Chatham Rise and the Snares/Solander Rise with respect to seabirds, due to those other places being recognised as areas of extremely high phytoplankton productivity, and being in close proximity to major seabird breeding colonies.

The experts agreed that the level of uncertainty was high and that some of the knowledge gaps needed to be addressed in order to fully assess the level of effects on birds. They agreed that if an adaptive management regime was to be implemented, it would need to respond to knowledge that could be gained from a targeted monitoring regime.

FISH IN THE SOUTH TARANAKI BIGHT

1.15 TTR Report: South Taranaki Bight Fish and Fisheries (MacDiarmid et al. 2013)

TTR commissioned NIWA to investigate the fish and fisheries of the South Taranaki Bight that may be impacted by the proposed iron sand recovery activities (MacDiarmid et al. 2013). The distribution and abundance of reef fish, pelagic fish, and demersal or seabed associated fish species were described using predictive models based on survey information conducted around New Zealand along with an assessment of the distribution, abundance and ecology of rock lobsters on the basis of extensive studies conducted elsewhere in New Zealand.

Commercial fisheries for fin fish and rock lobsters in the South Taranaki Bight were described based on catch and effort information held by the Ministry for Primary Industries.

MacDiarmid et al. (2013) found the following:

A range of marine habitats occur in the South Taranaki Bight that support a variety of
organisms including reef fish and invertebrates, crayfish, demersal fish and pelagic fish
species. The species richness of the reef fish, demersal fish and pelagic fish assemblages is
moderate on a national scale. None of the strictly marine species reviewed in this report are
nationally rare or threatened, although several diadromous species (species with a phase in
both marine and fresh waters) occurring in the region are listed as 'at risk – declining';
Some of the identified fish and invertebrate species support locally important commercial

- □ Some of the identified fish and invertebrate species support locally important commercial and customary fisheries. MacDiarmid et al. (2013) did not investigate the extent or location of recreational fisheries;
- ☐ The distribution of the marine life stages of diadromous fish in the South Taranaki Bight is unknown;













- ☐ There is some evidence for spawning activity by 13 demersal or pelagic fish species in the South Taranaki Bight, while larger juveniles of 24 species also occur in the region. However, the distribution of spawning adults and juveniles is poorly defined;
- Demersal and pelagic fish species with predicted distributions in the South Taranaki Bight that coincide with areas potentially affected by iron sand recovery operations include barracouta, blue cod, carpet shark, eagle rays, John Dory, golden mackerel, kahawai, leather jacket, lemon sole, red cod, red gurnard, rig, school shark, snapper, spiny dogfish, tarakihi, trevally, common warehou, and witch. Species that are predicted to be particularly abundant (> 50 kg per hour standard trawling) in the project area include barracouta, red gurnard, leather jacket, school shark, snapper, spiny dogfish, rig, tarakihi, and trevally.
- ☐ The demersal and pelagic fisheries likely to be most affected by iron sand recovery operations are the commercial set-net fisheries for rig, warehou, and school shark, and customary fisheries for rig and leather jacket. The greatest effort and catch in these commercial fisheries in the South Taranaki Bight is located to the south and east of the banks where the iron sand recovery operations are proposed to take place, while the greatest abundance of rig and leather jacket also occurs in this area; and
- At least 40 species of invertebrates and fish are customarily gathered or fished from the South Taranaki Bight. Harvesting sites vary from intertidal reefs to deep offshore areas and methods of collection vary from hand picking or gathering to specialised hook and line and potting techniques. Customary species occurring on inshore reefs most vulnerable to the effects of offshore sand extraction are sedentary species that cannot move sufficiently far or fast to avoid impacts. The customary fisheries offshore most vulnerable to the effects of iron sand recovery activities are those species which are abundant directly over the project area (such as rig and leatherjacket).

1.15.1 EPA Review Findings

The EPA commissioned SKM to undertake a peer review of MacDiarmid et al. (2013). The review by SKM concluded that predicted impacts of the proposed iron sand recovery activities on fish are low, and are primarily associated with direct impacts of fish being sucked into the pumping system during the iron sand recovery process. Additionally, fish are likely to be attracted to food entrained in the water column during operations and to the structure of the facilities for shelter. Lighting on the mining facility at night is also likely to attract some species of fish, squid and zooplankton. Fish appear to have a low abundance in the project area currently and SKM anticipated that changes in the community structure associated with establishing the iron sand recovery facility will be relatively localised (confined to an area of a few square kilometres).













1.15.2 Joint Expert Conferencing Results

As part of the 2014 hearing, conferencing of fish experts took place on 20 March 2014. This joint expert conference agreed that:

	The assumptions of the fish distribution modelling and the implications for the impact
	assessment are appropriate;
	Given that adult fish have lower sensitivities to noise than marine mammals, the measures
	to mitigate the potential noise effects on mammals will also reduce the effects of noise on
	fish;
	The cumulative effects of increase of suspended solids is unlikely to cause sub-lethal effects
	or growth effects except at the immediate source of the plume;
	The application of the ANZECC/ARMCANZ 2000 Guidelines for Water Quality Protection is
_	the appropriate standard for protection of zooplankton and fish populations;
	Detectable direct effects of decreases in water clarity on zooplankton and fish populations
	are highly unlikely;
	Given the proposed suction methodology and devices proposed, there will be no great
	opportunity for fish to gain entry into the iron sand recovery apparatus;
	The likely effects of light spill from the activities will be minor given the appropriate
	applications of industry guidelines that should be imposed by way of a condition; and
	Testing should be undertaken to ensure that the ANZECC/ARMCANZ 2000 Guidelines for
	Water Quality Protection are met.













COMMERCIAL FISHING

1.16 TTR Report: Assessment of Potential Impacts on Commercial Fishing (Fathom Consulting Ltd. 2013)

TTR commissioned Fathom Consulting Ltd. to assess the potential impact of the proposed iron sand recovery operations on commercial fishing interests in the South Taranaki Bight.

The main commercial fisheries in the immediate project area are a mix of bottom trawl fishery for trevally, leatherjacket, gurnard and snapper, and a set net fishery targeting school shark, rig and blue warehou. Nearby fisheries include a coastal rock lobster fishery and, on the seaward side of the project area, a mid-water trawl fishery for jack mackerel and a small bottom longline fishery.

The bottom trawl fishery occurs over a particularly productive area known as "the rolling grounds." The area is fished by one trawler based in New Plymouth and around a dozen from the top of the South Island, which visit on an occasional basis as part of their annual fishing plans. Although trawling effort occurs year round, the species taken show a distinct seasonality, with catches of many species peaking during the summer months.

The set net fishery has three main components. Rig is targeted in shallow waters within 4nm of the coast, school shark is targeted further out in waters around 50m deep, and blue warehou is targeted in shallow waters around Cape Egmont. Four set net vessels fish out of New Plymouth, often operating in all three target fisheries at different times of year, and several other vessels travel up from the South Island.

Quota ownership in both the trawl and set net fisheries is dominated by the large seafood companies Talleys and Sanford. Te Ohu Kaimoana Trustee is also a major quota owner on behalf of Maori, and several other iwi-owned companies feature in the top 10 quota owners for stocks in this area.

The assessment found that as the amount of displaced catch in both the trawl and set net fisheries would be small, it was unlikely that there would be any wider negative impacts on the commercial fishing industry – in particular, no negative impacts on quota value, downstream businesses, or fish stock sustainability are anticipated as a consequence of spatial displacement.

In the adjacent waters, the dispersal of the sediment plume is a key consideration. Further out in the EEZ the iron sand recovery operations are unlikely to have any negative effects on the mid-water trawl and bottom longline fisheries as the target fish species can migrate out of any areas affected by sediment dispersal.













Fathom Consulting Ltd (2013) also commented that the degree of impact on fisheries along the Taranaki coast, including the valuable rock lobster fishery and the developing shellfish fisheries, will depend on the amount of sediment that is introduced into the reef environment. They concluded that with appropriate management of sediment dispersal, no significant off-site impacts on commercial fisheries are anticipated. Since this assessment TTR has commissioned an assessment of the scale of marine ecological effects of seabed mining in the South Taranaki Bight by NIWA (MacDiarmid et al. 2015). It concludes that given the main area of distribution of rock lobster is close inshore in naturally turbid water, any displacement of lobsters or decrease in prey abundance or availability should have negligible effects on the state of the stock.

Mitigation measures recommended by Fathom Consulting Ltd (2013) included:

Developing a contact list of companies and vessels operating in the area;
Designing and implementing a communication system to alert vessel operators to the
intended location and duration of iron sand recovery activities on a regular basis;
Developing a more precise understanding of the location and seasonality of set net effort in
the area of the operations, and designing the mining operational plan to minimise any
impacts on the school shark fishery; and

☐ Undertaking the iron sand recovery operations in a manner that minimises the risk of sediment dispersal in the wider marine environment.

1.16.1 EPA Review Findings

The EPA commissioned AECOM to review Fathom Consulting Ltd (2013).

The review by AECOM concluded that the information presented in Fathom Consulting Ltd (2013) supports the conclusion that there would be no negative impacts on quota value, downstream businesses, or fish stock sustainability. This conclusion was based on the following assertions:

The habitat th	nat would	be	impacted	has	little	particular	fisheries	value	over	and	above
similar habitat	in the regi	on;	and								

☐ That the impacted habitat is small compared to the wider habitat.

1.16.2 Joint Expert Conferencing Results

As part of the 2014 hearing, conferencing of commercial fishing experts took place on 20 March 2014. The experts all agreed that there will be localised and transient changes in the distribution and abundance of commercially important fish species in the immediate vicinity of the iron sand recovery operations that could result in changes to catch rates (either positive or negative). Experts were unable to agree on the scale of effects further away in Fisheries Management Area 8 (which extends from Plimmerton in the south to Waikawau in the north).













However, the experts all agreed that if the site had been in operation, the level of historical catch foregone across the 65.76km² project area would range from 0.001% to 1.658% of the fish stocks harvested from within the relevant quota management areas.

They also agreed that exclusion is unlikely to result in more than minor additional costs for fishermen (due to the small amount of displaced catch), and is unlikely to have a more than minor adverse effect on fishing operations, profitability, fish stock sustainability or quota value averaged across the whole relevant quota management areas.

GEOLOGY

1.17 TTR Report: Geological Desktop Summary Active Permit areas 50753 (55581), 54068 and 54272, South Taranaki Bight (Orpin 2013)

TTR commissioned NIWA to undertake an evaluation of geological information relevant to the project area. This factual report (Orpin 2013) evaluated NIWA's 50 year archive, comprising limited sediment samples, cores, and coverage by seismic reflection and side-scan sonar surveys in the South Taranaki Bight.

Orpin (2013) noted that in the South Taranaki Bight a shore-connected Holocene sand prism, up to 20m in thickness at the coast, extends seaward to around 20-30m water depth. The middle shelf is also covered by a sheet of gravel and sand, is commonly rippled by wave action and is draped with 1-3m of muddy sediment at > 50m water depth. At around 100m water depth, muddy deposits dominate the seabed and sub-seafloor.

Sediments containing >5% iron sand are largely spatially restricted to the inner and middle shelves. On the middle shelf, buried coarse-grained transgressive deposits that occur south of Patea and Whanganui could contain iron sand concentrations.

The limited suite of intact shelf cores archived at NIWA show that measured iron concentrations are variable, but typically increase down-core with a relative enrichment of iron sand in the shell gravel lag at the base. This trend appears to be less apparent nearer the shore.

1.17.1 EPA Review Findings

Orpin (2013) was not formally reviewed by the EPA, as it provided a factual report which was relied on by a range of other assessments commissioned by TTR.













NAVIGATIONAL

1.18 TTR Report: South Taranaki Bight Marine Traffic Study (Marico Marine Ltd 2013)

TTR commissioned Marico Marine Limited to undertake a comprehensive study (Marico 2013) into marine traffic movements and navigational safety within the South Taranaki Bight in order to establish the impact of the iron sand recovery project TTR on shipping.

Marico (21013) reviewed 12 months of vessel movement records in the South Taranaki Bight. The results showed considerable variability in marine activity within the South Taranaki Bight, but that the project area has low levels of existing transit activity. There are very well demarcated shipping routes between major nodes, which contain the majority of dry cargo and liquid tanker traffic. This is particularly so between New Plymouth, Nelson and the Cook Strait, and these routes are well away from the proposed area of dredging operations. The activity of fishing vessels around the centre of the South Taranaki Bight is far more dispersed and accounts for a large proportion of the non-transit movements. There is a natural focus of offshore services around the oil and gas installations to the south west of the South Taranaki Bight.

Near project the traffic density was generally low to very low, with only a handful of vessels transiting through the site in the 12 month data period. The majority of vessels operating adjacent to the project area were engaged in servicing the Kupe gas rig operation.

A single shipping route between the Cook Strait and the Taranaki Bight was identified as adjacent to the proposed site, but was at a distance of five nautical miles. The disposition of traffic in that route was defined. Within this five mile distance, only 58 vessel movements were recorded in the 12 month period (approximately 1 movement every 6 days). Most of these transits were small dry cargo ships. There was shown to be both a low number of vessel encounters and vessel exposure, indicating a low risk of collision and plenty of sea room for vessels to navigate around the proposed iron sand recovery operations.

The results show that the proposed project area is located in an area of a very low traffic density and the iron sand recovery operations would have very little impact, if any, on the safety of navigation in the adjacent areas.

Given the low level of traffic, the operation could use standard marine watch-keeping systems to interface with other vessel traffic and based on the data, there is no need for any remote management of vessel traffic through the proposed site. The only vessels missing from this data set will be small vessels not fitted with AIS transponders. All vessels involved in the proposed iron ore extract operation are recommended to be fitted with AIS data transponders.













1.18.1 EPA Review Findings

The EPA commissioned North and Trew Ltd Marine Consultancy to undertake a review of various navigation-related reports prepared for TTR, including Marico (2013). The North and Trew Review found that Marico (2013) was sound in structure and useful in part, although its scope was limited and therefore its conclusion, that the iron sand recovery operations will occur in an area of low marine traffic, would not apply to some aspects of the operation, which were intended to be carried out elsewhere.

1.19 TTR Report: Report on the Maritime and Navigational Impacts of the Project (Barlow 2013)

TTR commissioned R N Barlow and Associates Ltd to prepare a report on the maritime and navigational impacts of the project (Barlow 2013). The key findings were:

The project area is removed from regular marine traffic routes and activities and should not
be in conflict with other marine traffic and activities in the area;
An exclusion zone around the FPSO is unlikely to affect recreational opportunities in the
project area as the Marine Traffic Study indicates that the area is very lightly used by any
vessels. The site is also well removed from recreational boating launching and mooring sites;
All the major vessels employed on the project will be classed by a member of the
International Association of Classification Societies (IACS) and be compliant with the Safety
of Life at Sea Convention (SOLAS) and all other International Maritime Organisation (IMO)
Conventions as well as the Laws of New Zealand. Any other smaller vessels will be registered
under the New Zealand Safe Ship Management System (SSMS);
Biosecurity issues associated with the project essentially revolve around the management of
ballast water and hull fouling of vessels arriving in New Zealand. All vessels arriving in New
Zealand are required to make a 'Ballast Water Declaration' and comply with the 'Import
Health Standard for ships ballast water from all countries' issued under Section 22 of the
Biosecurity Act 1995. In addition, arriving vessels will be required to meet the 'Craft Risk
Management Standard (CRMS) for Biofouling on Vessels arriving to New Zealand' issued
under section 24G of the Biosecurity Act 1993;
Operational discharges will comprise of sea water used for cooling machinery and products
of combustion from engines and turbines. Sewage and garbage will be dealt with as required
under MARPOL Annex IV and V;
·
All oils will be retained on board for disposal ashore at an approved facility;
Any hazardous materials will be retained on board for disposal ashore at an approved
facility; and













☐ The project is likely to use a number of different ports to support the vessels engaged in the project depending on the services required and the method of delivering them. The ports of Whanganui, New Plymouth and Nelson are the closest to the project area in that order, and each may offer the project support in different ways according to their capabilities.

1.19.1 EPA Review Findings

The EPA commissioned North and Trew Ltd Marine Consultancy to undertake a review of various navigation-related reports prepared for TTR, including Barlow (2013). The North and Trew Review found that Barlow (2013) adequately covered most of the maritime and navigational aspects of the project, but that it failed to provide a sufficient level of detail in respect of marine vessel operations and transfer operations.

The two gaps were addressed in detail in the Joint Expert Conference discussed below.

1.19.2 Joint Expert Conferencing Results

Expert conferencing of the Navigation Safety experts took place by telephone between 13 March 2014 and 26 March 2014. This conference jointly addressed information in Marico (2013) and Barlow (2013).

The following facts were agreed:

П	That it is reasonable to assume that all other vessels contracted or employed for bunkering
	and the associated engineered systems will be of relatively recent design and will comply
	with internationally recognised standards and codes;
	That the system designs should be informed by international best practice in bunker fuel
	handling, formal risk analysis and assessment and incorporate all reasonably practical
	measures to enable safe bunkering and fuel transfer operations of high integrity;
	The operating procedures for fuel transfers should be incorporated in the 'Project Safety
	Case' and be approved by Maritime New Zealand;
	Hydrodynamic Studies should be undertaken for transfer operations to ensure the operating
	procedures and Upper Operating Limits are properly determined during the risk analysis and
	HAZOP studies;
	That hydrodynamic studies will be undertaken for transfer operations to inform the design
	of the vessels and transfer equipment and systems and safe operating limits;
	That the system designs will be informed by contemporary international best practice,
	formal risk analysis and assessment, and incorporate all reasonably practical measures to
	enable vessel and mining operations to be of high integrity and safe;













An interpretation of the Maritime Transport Act 1994 (provided by Maritime NZ to the EPA
as part of this hearing process) places into doubt MNZ's interest in overseeing product
transfer operations, as it differentiates between this and tanker-to-tanker transfers
(bunkering). It further differentiates between bunkering and tanker to installation transfers
although it does not make clear what interest it has in the latter operation;
That all transfer vessels will carry fuel and personnel and therefore all transfer operations
carry an inherent level of risk, which could be increased if the site for such transfers is ad-
hoc;
There is a current transferral of particular MTA responsibilities to the EPA, and a level of
uncertainty as to where some responsibilities will ultimately lie. Any uncertainty can be
satisfactorily resolved or managed by ensuring that the conditions of any consent granted
include mechanisms for ensuring approval and monitoring of both the locations of the
transfer operation and the operation itself is required. This is necessary to ensure a safe
operation and to minimise the risk to other shipping and the environment;
In addition to prevailing and forecast meteorological conditions, transfer operations carried
out away from the project area must be undertaken in a manner that does not create a
navigation hazard to shipping and occurs out of recognised shipping routes. The Marico
(2013) study should provide guidance in selecting areas;
Transfer operations should be undertaken with the receiving vessel at anchor or under
dynamic positioning system or making steerageway only;
The project operations manuals and contingency plan should be constructed around a
comprehensive 'Project Safety Case' which should be applied to all project operations;
The Project Safety Case' should also provide the basis for applications to Maritime New
Zealand for fuel and product transfer operations at sea as required under the Marine
Protection Rules Part 103; and
A set of agreed conditions were developed to satisfy navigational safety concerns.













NOISE

1.20 TTR Report: Assessment of Noise Effects (Hegley Acoustic Consultants 2013)

TTR commissioned Hegley Acoustic Consultants Ltd in 2013 to prepare a report on the noise effects from TTR's proposal, and the potential effects of any associated noise on marine mammals in the area (Hegley 2013). The key findings were:

☐ The underwater noise from the crawler operating has been predicted at typically 130dB at 200m, 121dB at 500m, 115dB at 1km and 108dB at 2km (all sound levels expressed as "re 1μPa"). Estimates are based on an operational depth of 30-40m; ☐ The noise level from the IMV (including the generators to power 80 MW of machinery) will be typically 188dB at 1m when transiting. The IMV is a smaller vessel and will have a predicted level of typically 185dB at 1m when transiting and the Anchor Handling Tug will be typically 170dB at 1m (all sound levels expressed as "re 1µPa"); □ No hearing hazard or communication masking for marine mammals is anticipated from the proposed iron sand recovery operations. Therefore, no change to the migration or lifestyle of dolphins or whales due to noise is anticipated; ☐ If marine mammals are close to the dredging (approximately 50m) the environment will be noisy at 47dB above the threshold of hearing. However, these levels are not believed to be sufficient to cause any unacceptable disturbance for marine life; and ☐ There is no past evidence of any adverse effects of noise for marine mammals in the area from the existing shipping lanes, and therefore the shipping activities will not cause adverse noise related effects.

1.20.1 EPA Review Findings

The EPA commissioned URS New Zealand Limited to undertake a review of Hegley (2013). The URS review found that:

Hegley (2013) does not consider the availability of any national or international guidance on marine mammals and underwater noise impacts;
The noise assessment does not consider the duration of the works, specifically the 20 year expected project life and the 24/7 operations;
The assessment of noise has considered likely levels of source noise, propagation of noise and the assessment of effects. Noise level information has been provided, but there is a lack of cross referencing;
Hegley (2013) has extrapolated the dredge in air sound power level to an underwater level without stating how the calculations have been performed;
The individual noise sources present in the project area will combine to produce higher noise levels (i.e. combined noise from dredging and vessel noise). Cumulative noise has not been considered in the study; and













☐ Hegley (2013) has used historical data to determine whether marine mammals will perceive noise from iron sand recovery operations and whether behavioural effects will occur.

1.20.2 Joint Expert Conferencing Results

Expert conferencing of experts in the fields of marine mammals and noise took place on 19 March 2014. This conference jointly addressed information in Hegley (2013) and supplementary information provided in response to the information gaps identified in the URS review.

In respect of noise, there was no agreement among the experts on the noise levels and frequencies produced by the proposed operation or the sound propagation models.

It was agreed that it would not be appropriate to rely solely on a condition that required management action in response to observed changes in marine mammal behaviour.

The experts agreed that setting a noise limit at a distance from the operation is an appropriate management approach, and in setting such noise limits it was important to consider not only the sound level but also the frequency spectra of any noise. The group was unable to reach agreement on a sound level or distance to use as a condition.

Note: With one exception (who was not in fact a specialist in marine noise), all experts agreed that the following would represent an appropriate noise condition:

The consent holder shall comply with the following requirements in relation to underwater noise:

- a) The combined noise from the FPSO and Crawler operating under representative full production conditions shall be measured nominally 10m below the sea surface at 300m, 500m, 750m and 1000m from the port or starboard side of the FPSO. The combined noise level at 500m shall not exceed 130dB re 1µPa RMS linear in any of the following frequency ranges: low frequency 10-100 Hz, mid-frequency 100-10,000 Hz, and high frequency >10,000 Hz; and the overall combined noise level at 500m across all frequencies shall not exceed a sound pressure level of 135 dB re 1µPa RMS linear; and
- b) Measurements shall be undertaken in calm sea conditions (e.g. Beaufort sea state less than 3 (beginning of white-capping)), with no precipitation and no external noise sources (e.g. passing ships.













OCEANOGRAPHIC INFORMATION

1.21 TTR Report: South Taranaki Bight Iron Sand Mining: Oceanographic Measurements Data Report (MacDonald et al. 2013a)

TTR commissioned NIWA to undertake a field programme to measure currents, waves and sediment transport in the South Taranaki Bight. The primary goal of the field programme was to collect an oceanographic data set that would support the development by NIWA of numerical models of current flows, waves and suspended-sediment plume dispersion in the South Taranaki Bight. Studies were undertaken between September 2011 and July 2012, and included an extreme weather event (3 March 2012).

The report on these investigations (MacDonald et al. 2013a) presented a synthesis of the oceanographic field measurements with the following main findings:

- □ Tidal currents account for a significant proportion of the measured currents at all sites. The peak ebb or flood current speed ranged between 0.13m/s and 0.25m/s. Somewhat higher and lower tidal speeds occur on spring and neap tides respectively. At all sites the tide was oriented in the southeast northwest direction (parallel with the coastline). The presence of such tidal current speeds well offshore in the South Taranaki Bight was found to arise from the alternate flow of water over the extensive, relatively shallow, shoals off Hawera and Patea;
- □ Currents in the South Taranaki Bight were also found to be substantially affected by wind conditions with large current speeds of around 1m/s measured on a number of occasions during periods of high winds. Winds blowing from the west and the southeast sectors had the most pronounced influence on currents. Moderate to strong winds not only increased current speeds, but also greatly altered current direction. During strong winds, currents could set in a constant direction for more than 24 hours. During calm conditions currents reversed approximately every 6.2 hours with the tides re-asserting dominance;
- At most sites during periods of light winds the prevailing current drift was towards the southeast, which is consistent with the influence of the D'Urville Current which sweeps past Farewell Spit and turns around in the South Taranaki Bight to head south. However, current drift directions were significantly altered by moderate to strong southeast winds, which reversed the drift towards the northwest. During times of moderate to strong west to northwest winds, the prevailing southeast drift was considerably enhanced;
- □ Wave data clearly showed that the South Taranaki Bight is a high-energy environment. At the deep sites, significant wave heights in excess of 4m were routinely observed. The highest significant wave height of 7.1m was recorded on 03/03/2012 at 05:40 during an extreme weather event in South Taranaki;



direction.











Waves greater than 2m in height arrived mainly from either the south – south - southeast or from the southwest – west-southwest sectors. There was a reduction in wave height moving from the offshore deeper sites into the shallower sites close to the shoreline, which is part of the wave shoaling process. There was also a reduction in wave height moving down coast in a south - southeast direction, caused by sheltering of the prevailing southwest to west-southwest swell by Farewell Spit;
Temperature and salinity measurements show that the water column in the South Taranaki
Bight was generally well mixed. Slightly lower salinity is likely to be found in the vicinity of
major rivers in the South Taranaki Bight (e.g., Patea, Waitotara and Whanganui);
In the near-surface waters, the maximum suspended-fine-sediment concentration (SSC) was
0.025 grams/litre. At some sites SSC varied over the deployment period, with peaks in SSC
tending to occur during or just after periods of significant rainfall. At these times it is likely
that rivers were discharging fine sediments into the South Taranaki Bight, which were then
being transported in suspension through the measurement site. Some of the peaks in \ensuremath{SSC}
also coincided with times of large waves;
The largest suspended-sand concentration very close to the seabed was 1.9 grams/litre. At
all sites, periods of increased sand concentration coincided with periods of large waves, thus
highlighting the importance of waves in re-suspending sand from the seabed in the South
Taranaki Bight. During calm periods, no sand was found to be in suspension; and
Over the duration of the largest sediment-transport event, 3,355kg of sand per metre width
of seabed was transported in suspension by currents. This equates to a volume of 2.1 m3 of

1.22 TTR Report: Nearshore Optical Water Quality in the South Taranaki Bight (MacDonald et al. 2013b)

TTR commissioned NIWA to undertake a field programme to measure background optical water quality and suspended sediment concentrations (SSC) in the nearshore region (within 2.5km of the shore) of the South Taranaki Bight. The field studies were undertaken to provide background details to help assess the potential effects of offshore sand extraction on the surrounding environment, in particular the effect of sediment plume dispersal.

sand transported per metre width of sea bed. These are gross transport rates in any

The report on these investigations (MacDonald et al. 2013b) presented a synthesis of the oceanographic field measurements, with the following main findings:

Measurements from nearshore boat surveys showed that SSC and optical variables vary
significantly with distance offshore, with SSC and diffuse light attenuation being greatest
closest to the shore, and visual clarity increasing rapidly with distance offshore;
There appears to be a reduction in SSC (and hence an increase in visual clarity) moving down
the coast in a south - southeast direction;













- During the last two weeks of the deployment period there was a significant increase in SSC, coinciding with increased river flows. At these times it is likely that the rivers were discharging fine sediments into the South Taranaki Bight, which were then being transported in suspension through the measurement site. Some of the peaks in SSC also coincided with times of high wind speed but low river flows. These peaks in SSC are most likely wave-driven. At these times, wave stirring is entraining fine sediments from the sea floor, which are subsequently mixed into the water column;
- □ During river and wave events, less than 1% of the ambient light is reaching the seabed benthos;
- ☐ The deployment took place during a period of lower than expected rainfall for that time of year, and consequently during a period of low river flows. Since rivers are a major source of fine sediments into the South Taranaki Bight, it is likely that the data are representative of conditions with clearer water; and
- Overall, the field dataset provides a comprehensive picture of the background optical water quality and SSC in the South Taranaki Bight. These results can be used with confidence to help assess the potential effects of offshore sand extraction on the surrounding environment, and in particular the effect of sediment plume dispersal in the nearshore environment.

1.22.1 EPA Review Findings

EPA commissioned SKM to review reports relating to the effects on the physical environment. These included MacDonald (2013a) and MacDonald (2013b). The SKM review found that the description of the existing environment is generally comprehensive, despite there being little published information about the study area and its environmental values. They noted that the applicant has undertaken extensive field investigations to assist in describing the environmental values of the project area and referred to published literature where it is available. There is also significant breadth in the analysis of existing environmental values, with consideration of a diverse range of issues affecting the coastal zone and oceanographic processes.

1.22.2 Joint Expert Conferencing Results

Expert conferencing of experts in the field of effects on bathymetry and oceanographic process took place on 20 March 2014. Among other matters, this conference addressed information in MacDonald (2013a) and MacDonald (2013b).

In regard to oceanographic measurements, all experts agreed that the oceanographic measurements are fit for purpose and to international standard. They identified no areas of disagreement, and they identified no areas of uncertainty beyond the normal measurement error and natural variation implicit in any field measurements.













OTHER MARINE MANAGEMENT REGIMES

1.23 TTR Report: Other Marine Management Regimes Assessment (Boffa Miskel 2013)

TTR commissioned Boffa Miskell Limited to undertake an assessment of the project against the statutory provisions of other marine management regimes considered of relevance under the EEZ Act. This assessment (Boffa Miskell 2013) evaluated the way in which TTR's Impact Assessment documentation had given consideration to these statutory provisions, and concluded that the full effect of these statutory provisions had been addressed.

It was further considered that project will not be inconsistent with any of the relevant provisions in the 'other marine management regimes' assessed.

1.23.1 EPA Review Findings

Boffa Miskell (2013) was not subject to a specific peer review by the EPA, but was evaluated by staff directly, with further information requested under s42 of the EEZ Act in relation to the following matters:

- ☐ Further information on how vessel design and safety information will be compiled and delivered to the relevant agency / agencies;
- ☐ Further information on how vessel design and safety information will be compiled and delivered; and
- Detail of the 'result' or 'effect' of other management regimes in relation to the nature of the activity that will take place and the effects of the activity that will take place? In particular in relation to:
 - o Maritime NZ oil spill contingency planning requirement.
 - Maritime NZ requirements for flagging and the classification body of the FPSO and other vessels.
 - Maritime NZ requirements which will impact on the movements of the ancillary vessels.
 - Health and Safety Act requirements
 - The effect of any other marine management regime which influences the nature of the activity or the effect of allowing the activity
 - The extent to which imposing conditions might mitigate adverse effects

TTR provided this information to EPA in February 2014, which was satisfied enough to proceed with the hearing process.













1.23.2 Joint Expert Conferencing Results

No joint expert conference specifically addressed Boffa Miskell (2013). However, on 18 March 2014 a joint conference was held among experts on the development of conditions in mitigation of adverse effects. At this conference the experts agreed that RMA best practice and quality planning principles apply in the context of setting of conditions and that adaptive management is an appropriate approach in the context of the application (as applied for in 2013 / 2014).

RECREATION

1.24 TTR Report: Recreation and Tourism Assessment of Effects (Greenaway and Associates 2013)

TTR commissioned Greenaway and Associates in 2013 to identify the recreation and tourism activities which occur in the area that is potentially affected by the project. Greenaway (2013) found as follows:

- ☐ The regionally important coastal marine recreation settings in the study area are based at the main public access and activity points: Ohawe Beach, Waihi Beach, the mouths of the Tangahoe and Manawapou Rivers, Patea, Waipipi, Waiinu, Kai Iwi and Castlecliff, and the fishing and cray-fishing resource up to 20km offshore. The level of shellfish gathering along the coast is unclear, but is a locally important activity;
- ☐ The section of coast extending from Patea to Cape Egmont is relatively lightly fished in comparison with the coast south of Patea and in North Taranaki. Very little recreational fishing occurs more than 20km offshore along the entire west coast of the North Island;
- ☐ Tourism activity in the study area is largely limited to the six beach camp sites and three fishing charter operations two operating from Patea and one from Whanganui; and
- □ Potential effects of the project of interest to the recreation and tourism community are, as identified from concerns expressed at public meetings and interviewees contacted for this report, and review of technical data prepared for TTR:
 - Turbidity effects (underwater visibility and smothering of biota) and the location of the sediment plume and sediment effects on onshore and offshore reef systems;
 - Re-suspension of returned sand during storm events or other wave action and the potential for long-term turbidity issues;
 - Re-colonisation rates for biota in the project area;
 - o Toxicity of returned sand and effects on biota throughout the study area;
 - Changes to coastal wave patterns affecting surfing opportunities;













- 'Sand budget' effects on the replenishment of beaches and sand bars (also an issue for surfing);
- Exclusive use of the marine area in the project area and interference with navigation routes for recreation craft; and
- o Effects on the environmental ('clean green') reputation of New Zealand.

Review of relevant technical reports indicates the following potential scales of effect:

- □ Potential adverse effect on recreation and tourism due to changes to water clarity are:
 - Minor in the inshore marine setting where most recreational activity occurs due to the very low scale of effect on water clarity in the inshore environment and the high level of background suspended sediment;
 - Minor in the important diving setting of the Traps due to a persistent but small scale change in water clarity, which will be most apparent only when the iron sand recovery activity is occurring in the eastern part of the project area (that is, not for the full period of mining activity);
 - O However, there is potentially a moderate scale of effect in water clarity at the Traps during the rare periods of extreme water clarity (>10m horizontal visibility on the bottom for four days per year), which are likely to coincide with ideal settled diving conditions and are therefore likely to be experienced by divers seeking a scenic experience, and when water clarity is marginal (<5m) for divers hunting crayfish. Similar effects are also likely at the less important diving setting on the Graham Bank; and</p>
 - Minor on the offshore surface recreation experience in the South Taranaki Bight (fishing, sailing and other boating), due to the large scale of the offshore setting, the relatively low level of activity in the plume area and the transient characteristic of the experience.
- Potential adverse effect on recreation and tourism due to changes to marine ecology are:
 - Minor on recreation and tourism in the mining area due to very low levels of use of the setting and the large scale of alternative and proximate activity areas, although site-specific effects on benthic marine organisms will be greater; and
 - Minor for recreation and tourism activities outside the mining area due to the low scale of adverse effects on marine ecosystems.
- ☐ There is also:

The potential for only minor, if any, effect on surfing, and inshore recreation which relies on natural beach replenishment processes, due to the very low scale of potential adverse effect ('insignificant' changes to wave patterns and only a very weak potential link between the mining setting and inshore sediment levels);













The potential for only very minor effects on recreation and tourism in the South Taranaki Bight due to exclusive occupation of the marine environment as proposed due to the very small area occupied by the activity; and

Very little potential for adverse effects on New Zealand's tourism brand as the mining activity has limited adverse environmental effects and occurs well away from internationally and nationally important tourism settings.

Greenaway (2013) concluded that adverse effects of interest to recreation and tourism are therefore likely to be largely local to the iron sand recovery activity, and will relate to exclusive use of the marine setting, local turbidity effects (up to 10km from the site) and short-term effects on habitat in recently mined seafloor. The main recreation effects of interest are on diving at the North and South Traps. Adverse turbidity events will be limited to the periods when mining occurs in the eastern part of the mining area and may influence recreation satisfaction when water clarity would normally be extreme (approximately four days per year) and when diving is marginal for crayfishing, with 19 more days of visibility below 2m in a year with proximate mining activity. Similar effects will occur at the less important diving setting on the Graham Bank.

1.24.1 EPA Review Findings

The EPA commissioned Market Economics Limited (ME) to undertake a peer review of the potential effects on recreation associated with the project. The ME review was satisfied that Greenaway (2013) had addressed the recreation activities that could be affected by the project. However, ME noted that an assessment of recreation activities potentially affected if operations do not go as intended was omitted.

1.24.2 Joint Expert Conferencing Results

On 18 March 2014, a joint conference was held among experts on social, recreation and tourism impacts. At this conference the experts agreed that the EPA would be assisted by the provision of additional data describing the scale and role of tourism and recreation activity in the South Taranaki area. These data were appended to the joint witness statement, and were intended to 'set the scene' more clearly. However, it was agreed that the data on tourism and recreation activity is not sufficiently detailed to be used as a baseline against which effects of the proposal in its intended operation could be measured.

The witnesses also agreed that a major oil spill or other disaster (unintended outcome) has the potential to have significant adverse effects on coastal recreation and tourism. It was agreed that direct effects specific to businesses and recreation groups could be identified (at the time of the disaster).













SEDIMENT TOXICOLOGY

1.25 TTR Report: Iron Sand Extraction in South Taranaki Bight: Effects on Trace Metal Contents of Sediment and Seawater (Vopel et al. 2013)

TTR commissioned Auckland University of Technology (AUT) in 2013 to investigate the following aspects as a function of depth below the seafloor:

- (1) Selected physical properties of the target sediment;
- (2) The sediment content of acid volatile sulfides and simultaneously extracted trace metals; and
- (3) The concentrations of trace metals in suspensions of sediment in seawater.

TTR also contracted AUT to investigate if grinding enriched iron sand increases the potential of this sand to release trace metals when suspended in seawater.

AUT's report on the findings of these studies (Vopel 2013) concluded as follows:

No evidence for an increase with depth below the seafloor in sediment organic matter and
acid volatile sulphides (AVS) contents;
Concentrations of acid-extracted cadmium, copper, lead and zinc in deep sediment were of
the same order of magnitude as their maximum concentrations in surface (reference)
sediment;
The sediment concentrations of acid-extracted lead decreased with depth below the
seafloor at three of five sites;
Low probability of adverse effects of these dilute-acid soluble metals on benthic ecosystem
functioning; and
Concentrations of acid-extracted chromium and nickel in deep sediment were often one
order of magnitude higher than their maximum concentrations in surface (reference)
sediment. At four of five sites, acid-extracted chromium and nickel concentrations increased
with increasing depth below the seafloor.

For all metals except nickel, the concentration in seawater suspensions of deep sediment were either below detection limit (chromium, copper, lead, zinc) or, if a metal was detected (cadmium), the concentration did not exceed the ANZECC & ARMCANZ guideline for the protection of 99% of species. The detection limit of copper was below the guidelines for the protection of 95% of species.

The concentrations of nickel in the seawater suspensions of deep sediments (all five sites) and surface (reference) sediment (three of five sites) were equal or larger than the ANZECC & ARMCANZ guideline concentrations for the protection of 99% of species. However, the nickel concentration never exceeded the guideline concentrations for the protection of 95% of species.













Assuming that the nickel concentration in South Taranaki Bight seawater equals the detection limit for nickel, it would only require an 83-fold dilution of the elutriate extract to decrease the highest nickel concentration measured to below guideline concentrations for the protection of 99% of species.

Tests to investigate if grinding of iron sand will increase trace metals concentrations in the seawater revealed concentrations of cadmium, lead and nickel below the limits of reporting for all sediment samples. Chromium was detected in relation to the finely ground sediment fraction; and zinc was detected in relation to all grinding sizes. For both metals, the concentration averages for each sand size fraction did not exceed the ANZECC & ARMCANZ guideline for the protection of 99% of species. Vopel (2013) inferred a low probability of adverse effects of these metals on ecosystem functioning of the South Taranaki Bight water column.

The concentration of copper in seawater suspensions of iron sand concentrate increased with finer iron sand particles, exceeding the ANZECC & ARMCANZ guideline for the protection of 99% of species. A 160-fold dilution would decrease these concentrations to below the concentration limit for the protection of 99% of species.













1.25.1 EPA Review Findings

The EPA commissioned SKM to undertake a peer review of Vopel (2013). SKM found that the methodology of Vopel (2013) was generally appropriate, however they would expect the trace metal analytic list to include mercury, given that volcanic activity, the source of the iron sand deposits, is also a significant source of mercury in New Zealand.

TTR provided supplementary information in relation to mercury in response to this query. The review also requested additional information on immediate mixing of sediment plume metal levels within the near-field discharge. Again, TTR subsequently provided this information to the EPA.

1.25.2 Joint Expert Conferencing Results

Expert conferencing of experts in the field of effects on benthic ecology took place on 19 and 21 March 2014. Among other matters, this conference addressed information in Vopel (2013).

The experts agreed that concentrations of nickel and copper in the discharged seawater were unlikely to negatively affect the re-colonisation of the seabed, based on the updated information provided at the conferencing session. The experts agreed with the SKM reviewer in their recommendation to include analyses of mercury in any water quality monitoring programme until the expectation that the recovered sediment will not release mercury was confirmed.

The experts recommended monitoring of trace metals and other water quality variables that affect the bioavailability of trace metals (e.g., pH and dissolved oxygen) for the lifetime of the iron sand recovery operations in a) the seawater stream onboard the processing vessel, b) the discharged seawater stream in the vicinity of the outlet (distance to be determined), and c) the unaffected South Taranaki Bight seawater (background control).

SHORELINE PROFILE

1.26 TTR Report: Shoreline Monitoring Data Report (MacDonald et al. 2012)

TTR commissioned NIWA to undertake an 11-month beach monitoring programme along the South Taranaki Bight. The purpose of the monitoring was to provide background data, from which rates of change along the shore (shoreline stability) could be established, before the commencement of any offshore sand extraction.

A network of 32 beach profiles at 8 sites was established to monitor the shoreline stability along the South Taranaki Bight from Kai Iwi to Ohawe. The sites were selected as lying landward of the project site, away from rivers and headlands which may influence beach processes locally and where there was public access to the beach.













MacDonald (2012) described the methodology used in measuring the beach profiles and presented results from 11 surveys that measured 352 profiles (100% data capture) over an 11-month period from June 2011 to April 2012.

One of the 11 surveys was carried out immediately after a storm. The relative accuracy of the survey data was at worst deemed to be around 6cm in the horizontal and 3cm in the vertical. This level of accuracy was more than sufficient for the purposes of measuring changes in beach profiles. The beach profiles show that the shoreline along the South Taranaki Bight is very dynamic, with large changes in the beach profiles occurring at nearly all of the 32 profiling sites. At 6 of the 8 sites, there is little accommodation space for beach sand which appears to form a veneer only several metres thick over the rocky shore platform left by the retreating cliff line. Very high tides and waves reach right to the top of the beach and the toe of the cliffs, thus there is no space for sand dunes to build out of the reach of waves. Given the limited storage, potentially a large fraction of the entire beach volume is being washed off and on shore on a regular basis.

In addition to the beach profiles, on a single occasion, surface sediments were collected around the mid-tide mark at each of the profiles. The results of the sediment analysis showed that the majority of the surface sediments could be described as either moderately-sorted-slightly-gravelly sand or poorly-sorted-gravelly sand. At some sites, significant differences in sediment characteristics exist between profiles. Typically, gravel contents were less than 10%, except at Hawera which had gravel contents at all 4 profiles in excess of 20% and as high as 66%.

1.26.1 EPA Review Findings

The EPA commissioned SKM to undertake a review of MacDonald (2012). The review found that MacDonald (2012) provides new data on shoreline dynamics that represents best available information.

1.26.2 Joint Expert Conferencing Results

Expert conferencing of experts in the field of effects on coastal processes took place on 20 March 2014. Among other matters, this conference addressed information in MacDonald (2012) and concluded that shoreline profile monitoring measurements were fit for purpose and to international standard.

The experts identified no areas of disagreement, nor areas of uncertainty beyond the normal measurement error and natural variation implicit in any field measurements.













SOCIAL EFFECTS

1.27 TTR Report: Social Impact Assessment of Trans-Tasman Resources Ltd Iron Sand Mining Project (Corydon Associates Ltd 2013)

TTR commissioned Corydon Consulting Limited in 2013 to assess the social impacts of the project on local communities and identify possible mitigation measures (Corydon Associates 2013).

Corydon Associates (2013) noted that TTR's operations will be supported by onshore services operating from Port Taranaki and Port of Whanganui, and offices in New Plymouth and Wellington. The communities potentially affected by the project are therefore spread across a large geographic area, with different communities and groups potentially affected in different ways.

Corydon Associates (2013) concluded that:

It was unlikely that new jobs directly created by the project would address the relatively
high levels of unemployment in the Taranaki area because of the specialised skill levels that
will be required for most of the new positions. However, there could be increased
opportunities for residents of South Taranaki and Whanganui to access training and work
experience that is relevant to the range of positions associated with TTR's operations;
The project would benefit businesses that provide services or supplies for the various
aspects of TTR's operations. This will have a positive spin-off in terms of jobs and income for
the communities in which these businesses are located, as well as increasing the viability of
these businesses. It is anticipated that the majority of these benefits will accrue to
businesses in the "wider area", particularly in New Plymouth, which already have experience
in servicing extractive industries including those offshore;
The direct creation of approximately 250 jobs will result in higher standards of living (and
hence social wellbeing) for the households concerned. If many of these jobs are undertaken
by workers who live locally, the project will help to offset the lower than average household
incomes that are currently experienced in the profiled areas. Therefore, it is concluded that
the project will create positive social effects as a result of the opportunity for higher than
average livelihoods and financial support for the employees and their households; and
The project is estimated to create a workforce of approximately 250 people. If all these
workers were new to the area/region and they bring family with them, this could lead to an
increase of approximately 625 new residents. However, because the land-based aspects of
the proposed operations are spread across Taranaki, Whanganui and Wellington, and
because of the nature of the shift-work rosters, it is likely that the workers and their families
will be spread over a relatively large geographic area.













1.27.1 EPA Review Findings

The EPA commissioned Market Economics Limited (ME) to undertake a peer review of the potential effects on social impacts associated with the project. The ME review was satisfied that Corydon Associates (2013) had adopted a clear assessment methodology and framework for social effects assessment. It was recommended that more recent census data could be used but they considered that the use of such more recent data would not change/enhance the profile of the communities that was presented in Corydon Associates (2013).

1.27.2 Joint Expert Conferencing Results

On 18 March 2014, a joint conference was held among experts on social, recreation and tourism impacts. Matters related to the social impact of the iron sand recovery activities were not the main focus on the conferencing – which centred on tourism / recreation data and the potential for the project to affect New Zealand's international tourism reputation.

VISUAL EFFECTS

1.28 TTR Report: Seascape, Natural Character & Visual Effects Assessment (Boffa Miskell Ltd 2013b)

TTR engaged Boffa Miskell Limited in 2013 to investigate and review natural character, landscape/seascape and visual amenity matters with respect to the potential effects of the project.

Boffa Miskell (2013b) provided a detailed evaluation of the effects of the project on seascape, natural character and visual amenity. Effects were categorised as follows: Visual effects from specific viewpoints and viewing audiences; effects on natural features and natural landscapes (being defined and/or special or significant landscapes/seascapes and features); effects on natural elements, natural patterns and natural processed (the natural character of the coastal environment).

Boffa Miskell (2013b) concluded that:

□ While the visibility of the IMV will be high from marine areas within 10-15km of the vessel itself, the visual effects are assessed as being low overall and are unlikely to be perceived as being visually intrusive or adverse. Even though the IMV is large and its associated and smaller support vessels will also be present, and in some cases may be visible from the coastline for extended periods of time, the surface marine activities associated with the project are considered to be minor overall and where visible, will likely be seen as an "appropriate" working seascape activity;













- □ While visibility from aircraft has not been specifically modelled, it is likely that these occasional and intermittent views will not be significant and the operational vessels will likely be viewed as a focal point and feature in the seascape;
- □ For all coastal areas along the South Taranaki Bight, the visibility of the Project will vary and in general, and where visible, will be seen as a distant and background offshore activity within an expansive seascape setting. The visual effects of the surface marine activities are assessed as being minor and will not be adverse nor will they appear to be visually intrusive from important recreation and amenity areas;
- □ While navigational lights can be on permanently or intermittently, it is unlikely the navigational lights, in most instances, would be visible from the coastline. Operational safety lighting will be continuous and will be more apparent from coastal locations due in part to its extent, its elevation and the need to adequately ensure safe on board operational activity. Under favourable weather conditions it is likely to be visible from some coastal locations in the Patea to Hawera area. There are however, few public roads or residences located on the coast where operational lighting will be seen to be particularly or intrusively visible;
- ☐ Areas of outstanding coastal values within South Taranaki Bight were assessed as showing relatively minor, if any effect from the project;
- □ Visual effects of sediment plumes from recreational boats will be evident and highly variable depending on weather conditions and the offshore location of the vessels. There will however be observable visual effects in terms of surface sea colour change and pattern in the distant offshore waters in the immediate vicinity and to the east of the mining activity in what is currently a dark blue-green water area. The colour range within the plume is likely to range from dark blue-green to a lighter blue-green colour extending over a distance of some 35-40km to the east of the mine site. From this point, which is approximately 10-15km offshore, the plume then becomes a "milky" colour until it blends into the background offshore levels to the east off Wainui Beach to a more brown-green colour as it extends towards the Whanganui River mouth area. [It is noted that this conclusion will be revised in light of the updated sediment plume and optics modelling that has been undertaken in 2015];
- □ While the size and pattern (scale) of the sea surface colour change is extensive and significant in its seascape context, its significance in terms of recreational/amenity values is likely to be lower, given the relatively low levels of recreational activity that occur within the affected marine area. Notwithstanding this, the visual effect of the TTR-derived sediment plume is considered to be moderate to high overall from marine based locations within or in close proximity (3-5km) of the plume. The sediment plume will however, only be evident during the extraction operations and accordingly this effect in the blue-green marine area is reversible; and













□ Visual effects will be most apparent from recreational and commercial aircraft, and while these effects will be variable and dependant on weather conditions, they will tend to be experienced by transient viewers who in many instances will have no direct relationship with the area. In many instances, the visibility and the offshore pattern of the mining derived sediment plumes are likely to be seen as a feature and focal point in the South Taranaki Bight seascape. While the overall appearance and scale of the mine derived sediment plume will be most apparent from aircraft, given the characteristics of the viewing audience, the visual effects are assessed as being generally in the low to undetectable or observable range.

In terms of visible cumulative effects, the mining derived sediment will not add appreciably to the natural or background levels within the inshore and nearshore marine areas. There will however, be increased visual effects in terms of the offshore and distant offshore marine areas where currently there are no visible sediment plumes under most conditions. From the coastline cumulative effects are not likely to be particularly visible. From some marine areas, cumulative effects may be apparent, however, given the limited extent of views and the variability of the plume, cumulative effects are not likely to be perceived as being significant or adverse. From aircraft cumulative effects will be most apparent and are likely to be widespread in extent.

Effects on natural character were found to be minor, other than in relation to the plume near the operational area where effects were deemed to be low.

1.28.1 EPA Review Findings

The EPA commissioned SKM to undertake a review of Boffa Miskell (2013b). SKM accepted Boffa Miskell (2013b) conclusion that effects on natural features and landscapes are assessed as low, due to the distance of mining activities offshore, away from outstanding natural features of the coastal environment.

1.28.2 Joint Expert Conferencing Results

Boffa Miskell (2013) was not subject to a joint conference analysis. The findings were not disputed at the hearing.













WAVE AND SURF EFFECTS

1.29 TTR Report: Nearshore Wave Modelling Phase 4 Studies (Gorman 2013)

TTR commissioned NIWA in 2013 to undertake a numerical modelling study to investigate the impacts on wave conditions in the South Taranaki Bight that may result from modifications to the seabed as a result of mining operations.

Gorman (2013) sets out the findings of this study, and concluded that changes in nearshore wave parameters associated with seabed pits and mounds formed during mining operations as presently proposed are expected to be minor in comparison with the natural level of variability in those values. Corresponding effects from the presence of a large moored vessel during mining operations are expected to be comparable to, or smaller than, the effects of the pits and mounds.

1.29.1 EPA Review Findings

The EPA commissioned SKM to undertake a review of Gorman (2013). The review concurred with the assessment in Gorman (2013) that the impacts of iron sand recovery activities on bathymetry, waves and erosion will be minimal. Predicted changes arising from the project are generally insignificant in comparison with the magnitude of natural variability in factors influencing coastal and oceanographic processes (such as wind and waves).

1.29.2 Joint Expert Conferencing Results

On 18 March 2014, a joint conference was held among experts on coastal stability. Experts agreed that the hydrodynamic and wave models (Gorman 2013 and Hadfield 2013) used to generate inputs to the assessment of potential effects of the proposed activities on physical drivers and shoreline processes (Hume et al. 2013) were consistent with international practice and appropriate for the purpose for the purpose of assessing potential effects of the proposed activities on shoreline processes.

Another joint conference among experts on wave and surfing effects was held on 20 March 2014. Experts agreed that the modelling methods used, the spatial resolutions selected, and the choice of outputs reported from those simulations, were appropriate for the study.













1.30 TTR Report: Potential Effects of Trans-Tasman Resources Mining Operations on Surfing Breaks in the Southern Taranaki Bight (eCoast Ltd 2013)

TTR commissioned eCoast Marine Consulting and Research to investigate the impacts of the project on surfing breaks in the Southern Taranaki Bight.

eCoast (2013) found that the principal effects on surf breaks arise from changes in the wave climate. The changes in wave directions mostly follow the changes in wave heights. Given the location over 20km offshore of the closest breaks, effects of the project are likely to be insignificant. Due to the process of refraction over this distance, wave crests will likely be realigned to the seabed contours offshore of the breaks to a similar direction as they would without the presence of the seabed modifications.

1.30.1 EPA Review Findings

The EPA Review of TTR's Technical Reports on the Physical Environment (SKM December 2013) concluded that eCoast (2013) was a valid assessment representing best available information.

1.30.2 Joint Expert Conferencing Results

A joint conference among experts on wave and surfing effects was held on 20 March 2014. Experts agreed that the results reported in the evidence of Dr Shaw Mead, indicating only minor effects from mining activity on the quality of surfing and surf breaks in Taranaki, were soundly based.



TTRL OFFSHORE IRON SANDS PROJECT

SCIENCE PROGRAMME SUMMARY REPORT













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1. INTRODUCTION

Trans-Tasman Resources Limited (TTR) will, in 2016, lodge a marine consent application with the Environmental Protection Authority (EPA) under the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012 (EEZ Act) for the recovery of iron sand from the South Taranaki Bight. This new application follows a previous application by TTR in 2013/2014, which was declined by a Decision-Making Committee (DMC) appointed by the EPA. The DMC identified concerns about the scale of the predicted effects on the environment, particularly regarding the extent and density of the sediment plume, the effects on primary productivity and the scale of impacts on existing interests specifically iwi and commercial fishing interests (EPA, 2014), which it now transpires were based on a number of very conservative assumptions.

In light of the above, TTR has undertaken an extensive programme to supplement and update its modelling and assessment on the extent and density of the plume that will be generated during the recovery of iron sand. The purpose of the programme undertaken by TTR has been to provide additional, refined technical information regarding the predicted extent and density of the plume.

To undertake this programme of work TTR has augmented NIWA's expertise by retaining world-leading experts in sediment modelling, optics and primary production from New Zealand, the United States of America and United Kingdom.

Before embarking on the specification of any supplemental work, TTR set two primary objectives for its supplementary science programme namely that it would first have to address the specific concerns raised by the EPA's DMC and secondly that it would inform the development of an agreed set of conditions and any associated management plans.

In defining the scope of the supplementary programme it was crucial to TTR that the integrity of its completed science assessment, which had been subject to robust verification and review by all participants in the application process, was retained and that any further work was not only complementary but added value by providing more definition and accuracy.

In this respect TTR worked closely with its original science providers, to identify acceptable, recognised experts in each of the concerned areas and the original science providers also helped develop the scope of the supplementary science program.













The additional technical information consisted of:

South Taranaki Bight.

☐ A peer review of the methodology underpinning the modelling and assessment effort, as well as an evaluation of the basis for the assumptions and inputs into the plume model, optical model, and the assessment of effects on primary productivity; ☐ A sensitivity analysis that addressed specific variables and scenarios that could ultimately affect the impact that the sediment recovery operation would have on primary productivity; Further laboratory testing programs of: Sediment settling rates; o Sediment re-suspension; and Sediment aggregating mechanisms; Modelling and supporting studies in relation to the following: o Modelling of both the extent and density of the sediment plume; Optical assessment of the effects of the sediment plume on primary production; Detailed assessment of the effects on primary production; and Source terms assessment; ☐ Zooplankton and surface water quality surveys in the South Taranaki Bight in February 2015; and ☐ The preparation of an assessment that addresses the spatial and temporal impact of iron

sand recovery on zooplankton, seabirds, marine mammals, and fish species occurring in the













2. PEER REVIEWS

TTR has sought expert peer review advice on the project as follows:

- □ Specialist consultants, HR Wallingford ("HRW"), from the UK were commissioned to review all aspects of the sediment plume modelling previously undertaken;
- □ Professor Cahoon, from the University of North Carolina Wilmington, was retained by TTR to review all previous assessments of the optical effects of the proposal and the assessment of effects on primary productivity; and
- □ Dr Mark James and Prof Ian Hawes, who provided oversight and expert input to the additional science programme.

HR Wallingford Peer Review

HRW's review addressed the following aspects in this order:

transport modelling.

The source terms for the sediment transport model;
The near bed processes associated with the release of sediment;
The integrity of the flow model used to drive the sediment transport modelling;
and
Sediment properties and associated assumptions used within the sediment

HRW firstly reviewed the origin and extent of the assumptions as to how much of the re-deposited material is available in suspension for introduction as a source for the NIWA sediment transport model. The basis for these assumptions was the MTI near field modelling. A detailed review of near field processes and scenarios modelled led HRW to conclude that the previous MTI "near-field" assessment over-estimated the amounts of fine material available for being dispersed within the NIWA sediment transport model. HRW recommended further assessment of near field source terms to better represent the amount and nature of material available for dispersion.

With regards to the actual NIWA flow model used to drive the sediment transport prediction, HRW concluded that it was appropriate and fit for purpose.

The HRW review also noted that the NIWA sediment transport model assumed that the material discharged into the environment would remain in its particulate (un-flocculated) form. The review of the sediment properties and associated assumptions led HRW to conclude that the assumed settling velocities for the fine material as used in the NIWA modelling were too low and did not adequately represent the processes of flocculation that would occur. The applied assumptions resulted in an over-estimate of the turbidity in the water column and hence an overestimate of impact on light reduction.













Further laboratory scale tests were recommended to determine sediment particle settling rates, the effect of flocculation, and the required shear stress needed to re-suspend settled particles.

Professor Cahoon's Peer Review

Professor Cahoon noted that the conservative nature of the assessments was generally appropriate, but identified areas where this approach, in his opinion, was applied excessively (Cahoon, 2014a).

While Professor Cahoon identified the disturbance of sediment as the key environmental impact of the proposal, he regarded NIWA's assumption that the iron sand recovery process will essentially destroy all biota in the sediment as excessive. While the assumption is likely true for macrobethos and soft bodied organisms, his experience showed that microbiota would survive the recovery process rather well (Cahoon et al. 2012). He also expects bacteria to survive the process, allowing them to colonise any open surface areas on sediment particles within the created plume. Bacterial populations provide the "mucus" that contributes to making fine sediment particles cohesive as part of their adaptation to life at the sediment-water interface thus reducing their own vulnerability to suspension feeders, and allowing them to benefit from the steady advection of new resources that flow past them.

Professor Cahoon was of the opinion that the iron sand recovery process would temporarily reduce the populations of macrobenthic organisms, thus stimulating benthic microfloral production in the near-term (days to weeks following iron sand recovery), and in doing so providing a locally charged flocculation mechanism that would aid the settlement of sediments in the water column.

Professor Cahoon reinforced the point made by HRW that NIWA's decision to exclude the mechanism of flocculation from the initial modelling was unrealistically conservative. Flocs (aggregated particles) form naturally in the natural environment, especially when microfloral mucopolysaccharides are present.

Professor Cahoon stated that apart from enhancing settling rates, the formed flocs become food for suspension feeders and is confident, given the natural dynamic nature of the seabed in the South Taranaki Bight that these organisms will be extremely well adapted to consuming formed flocs and nepheloid material (i.e. material just above the seabed that's intermingled with significant suspended sediment). Professor Cahoon contends that any organism living in the soft-sediment environment of the South Taranaki Bight being subjected to occasional sediment suspension events will have similar capabilities.













Professor Cahoon advised that it is not appropriate to assume that a particular population of macrobenthos, such as the tube dwelling worms, are supported by the production occurring in the water column directly above them. Professor Cahoon's own studies have shown that advective (horizontal) transport supplies 10 to 100 times more organic material to a population of benthic suspension feeders than the biomass immediately above them. This reinforces the view that the disturbance of sediment within the production area will have relatively little effect on food supply for macrobenthos within the South Taranaki Bight, because the food supply is a factor of the movement of water and materials at scales of km per hour.

With regards to the estimates of impacts on primary production, Professor Cahoon stated that benthic microalgae (the photosynthetic component of the benthic microflora) would readily adapt to fluctuating light regimes and pointed to the fact that he himself has published several papers addressing this specific ability of benthic microalgae to adapt to very low light conditions (McGee et al. 2008; Cahoon et al. 1992). Professor Cahoon made the point that given the South Taranaki Bight produces regular natural suspension events, benthic microalgae would be well adapted to changes in light flux, thus minimising the impacts of any transitory sediment extraction event on their primary production.

3. TESTING REGIME

HRW undertook a series of laboratory tests to investigate the behavior of the sediments to be discharged under both saline and fresh water conditions. Tests were carried out to look at settling velocity, flocculation and critical shear stress for deposition and erosion.

The following laboratory tests were carried out by HRW on supplied sediments:

Sediment specific gravity;

- ☐ Sediment particle size distribution;
- □ Settling tests;
- ☐ Turbidity tests;
- ☐ Settling velocity measurements;
- ☐ Flocculation measurements; and
- ☐ Critical shear stress for deposition and erosion.

3.1 Sediment Specific Gravity

A representative sample of TTR supplied sediments from which the ore had been removed was used to determine the specific gravity of the typical "post-grind" fraction that would be deposited on the sea-floor. The results are provided in table below.













Sediment Sample	Description	Specific Gravity
1	TTR. X451 . 2 kg. Post-Grind Sediments. Composite Sample	3.11
2	Bulk 5030. Pre Grind. Ultra Fines	2.66
3	Bulk 501. L2. P1. IBC. Tails. 11.7 kg	2.82

3.2 Sediment Particle Size Distribution

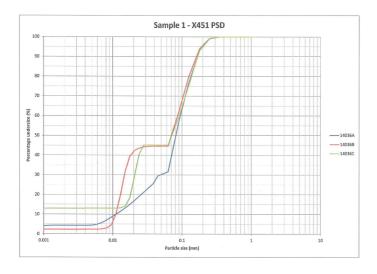


Figure 1: Post-Grind Sediments. Composite Sample

3.3 Visual Settling Tests

Visual settling tests were carried out on each of the three sediment types. Photographic records were made of 100mg/l and 1000mg/l sediment suspensions settling in 1 litre of both deionised and salt water over a three hour period.

The results of the visual settling tests demonstrated that all three material types flocculated when introduced into both salt water and deionised water. Importantly the visual settling tests demonstrated that, for all three samples, even after 3 hours there was still a proportion of very fine material in suspension.













3.4 Turbidity Tests

Following the suspension mass tests further test were undertaken to monitor the turbidity of the water as 8g samples of Sediment 3 (<0.038mm) settled through 8 litres of both salt water and deionised water over a period of 3 hours.

3.5 Settling Velocity and Resuspension Tests

The results of the tests undertaken by HRW suggest that the mass of fine sediment that will be disperse within the middle and upper parts of the water column upon release by sediment recovery will reduce by a factor of 3-5 (compared to the revised NIWA prediction) as the majority of released fine sediment will settle to the bed or near-bed waters because of higher rates of settling.

It was also found that the critical shear stress for resuspension of freshly deposited material was likely to be in the range of 0.2 to 0.3Pa rather than the 0.1Pa assumed by NIWA, meaning that resuspension of settled sediments was much lower than previously assumed.

4. 2015 MODELLING

4.1 Near Field Model

TTR's initial "near field" model was prepared by MTI in 2013 to provide an indication of the quantity of sediment that after release would help define the extent and density of resultant plume. The MTI model simulated the near-field mixing arising from sediment discharge via a pipe from 4m (and 9m) above the bed (MTI, 2013a, 2013b).

The peer review by HRW noted that the limitations of this initial model (i.e. not accounting for the initial radial collapse of the density current formed by the plume impinging onto the bed of the pit, considering only the coarse sediment discharge and the near-field mixing of sub 38 micron material) contributed to a significant, unrealistic overstating of the quantity of sediment available for further dispersion.

In addition, the peer review by HRW also found that the assumption made in the sediment transport model, that all of the fine sediment fractions were available for dispersion into the far-field, was overly conservative as there was a high likelihood that a portion of the fine sediment would be trapped in the immediate vicinity of the initial discharge. Based on this finding, TTR commissioned HRW to repeat the near field model in order to investigate the proportion of fine sediment that would be trapped in the pit - thereby allowing TTR to better define the proportion of fine sediment that would be available to be dispersed into the far-field, informing the final sediment transport model.













General Description of the Near Field Process

The figure below illustrates the general setup of the sediment recovery vessel and crawler. The crawler will dredge a lane approximately 25m in width at an average of 5m in depth, moving at an average speed of around 1cm/s. The Sediment recovery Support Vessel will be winched along the extraction path maintaining its position and orientation above the crawler.

At the leading edge of the new extraction block the crawler will be removing sediment while the vessel deposition pipe will be placing sediment back into an already de-ored pit, 300m south west of the crawler with the entire operation moving steadily in a northeast direction.

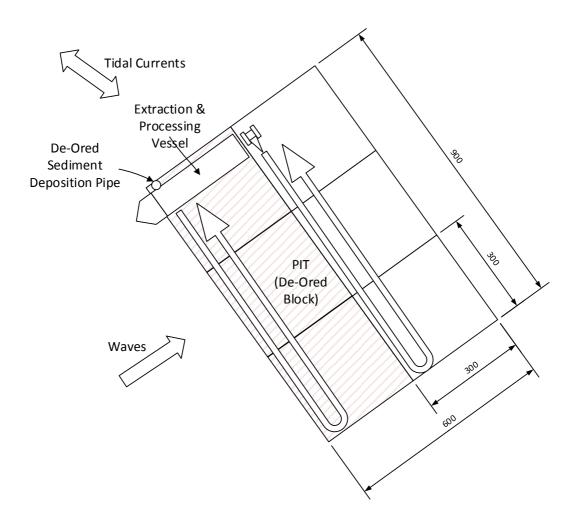


Fig 2: General Sediment Recovery Setup













During the iron sand recovery operations the residual sediment will be introduced into the water body via a single deposition pipe. The introduction of this combined sediment into the water column will result in a dynamic slurry plume that will be denser than the surrounding water, enabling a rapid descent towards the seabed. The dense plume will then collapse onto the seabed, slowly expanding and mixing with the overlying waters, this dynamic mixing will also be characterised by a slowing particle settling rate.

The sediment discharge will spread over the vast majority of the pit with the sandy, coarse material settling out closest to the point of discharge, while the finer sediment is expected to spread farthest. The settling of these slower settling fine fractions to the seabed within the pit will be limited by the action of currents which will tend to move sediment which has not settled within a certain time frame out of the pit.

Near Field Modelling Strategy

The HRW near field modelling utilised two different models to identify the behaviour of sediments released into the pit. A 3D model was used to show how the sediment deposition, the spatial arrangement of the placement in the pit, the formation of the density current, tidal currents and waves would interact with suspensions of the slowest settling fine sediment fractions.

A further model was then used to consider the interaction of different sediment fractions. This model used a simplified, homogeneous view of the behaviour of sediment in pit.

Near Field Modelling Conclusions

The near field modelling conducted by HRW established that all the fine sediment fraction settling at 10mm/s, 25% of the 0.1mm/s fraction, and 5% of the 0.01mm/s fraction would be entrapped in the placed material during the initial deposition process.

The remainder of the fine sediment will flow out of the pit and mix both horizontally and vertically. Because of its low settling velocity, this unconstrained sediment would tend to form a uniform concentration throughout the water column. This fine slow settling sediment would still be expected to form flocs with the background natural sediment and with fine material released by subsequent mining activity, which contains elements of biological material (e.g. extra cellular polymers), and would eventually aggregate to form larger flocs progressively settling out. The assumption in the NIWA sediment transport model of a constant settling velocity for the slowest settling material (0.01mm/s) is thus conservative and unrealistic.

4.2 Sediment Transport Model

Following the detailed review and a subsequent test program by HRW, TTR commissioned NIWA to produce an updated sediment transport model that allowed for more accurate modelling of the plume in relation to the following:













- ☐ Flocculation: The original plume model neglected flocculation, a process in which fine sediment particles combine into fast-sinking aggregates;
- □ Sediment Settling Rates: The extent to which the fine suspended sediment would settle to the bottom and be trapped in the matrix of discharged sand is predicted to occur to a greater extent than assumed previously; and
- □ Sediment Re-Suspension: The testing by HRW found that the shear stress required for resuspension of freshly deposited material was in the range 0.2–0.3Pa rather than the 0.1Pa (minimum value), as originally assumed by NIWA.

Sediment model setup

Sediment calculations were carried out on the two inner domains each nested within a larger-scale Greater Cook Strait model.

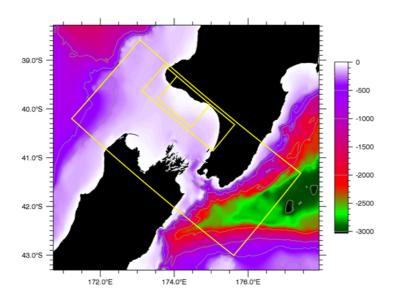


Figure 3: Sediment Model Setup

Background sediments

The base simulation represents background sediment processes using 7 sediment classes:

- $\hfill\Box$ The river-derived sediments that are injected by the rivers. There are two classes: coarse silt (16–63µm) and a fine silt/clay (< 16µm); and
- The seabed-derived sediments comprise the seabed at the beginning of the simulation. They range from coarse sand ($500-1000\mu m$) to fine silt ($4-16\mu m$).

There were two reasons for including the background sediments:













- ☐ Primarily, to acknowledge the interaction between the sediment recovery-derived sediment plumes and the seabed; and
- □ Secondarily, to produce estimates of background suspended sediment concentrations that can be compared with predictions of sediment concentrations resulting from the iron sand recovery operation.

Sediment recovery-derived sediments

Two main sediment streams from the iron sand recovery are considered in the sediment plume model: the hydro-cyclone overflow discharge and the de-ored sand discharge.

The de-ored sand discharge involves de-watered, de-ored sand being released from a pipe with a view to depositing it as compactly as possible, usually into a pit that has been excavated earlier. The de-ored sand is predominantly fine–medium sand (125–500 μ m) with some finer material. Both discharges are no more than 4m or so above the bottom of the seabed, and in the current proposal, are released close to each other - with a view to maximising the trapping of fine sediment in the pit with the coarser sands.

Sediment model results

(Comparisons with previous modelling work)

The effect of the increased definition in the elements listed above on the predicted plume extent and density can be demonstrated by comparing the median near surface results for sediments released from the most inshore and offshore mining locations in the modelling done in 2014 to that done in 2015. Results are presented for the whole domain of the sediment model.





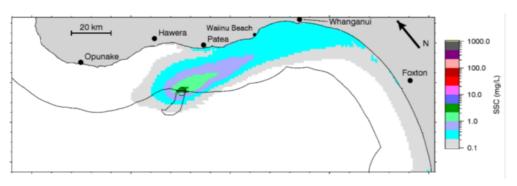


Figure 4: Inshore Sediment Release Median 2014

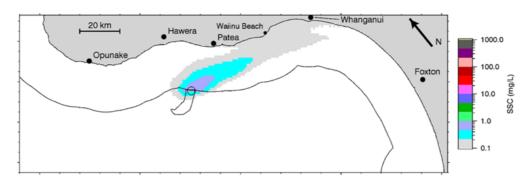


Figure 5: Inshore Sediment Release Median 2015

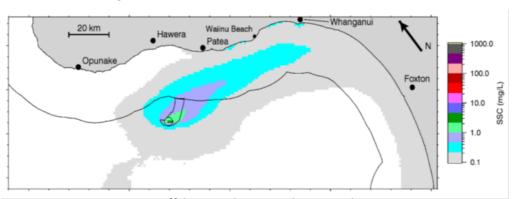


Figure 6: Offshore Sediment Release Median 2014

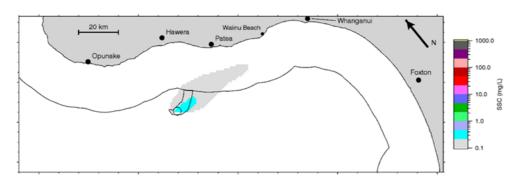


Figure 7: Offshore Sediment Release Median 2015



Comparisons with background

The effect of the plume created by the iron sand recovery derived sediment compared to background sediments can be demonstrated by comparing the near surface results for background with the background plus sediments released in the iron sand recovery operation.

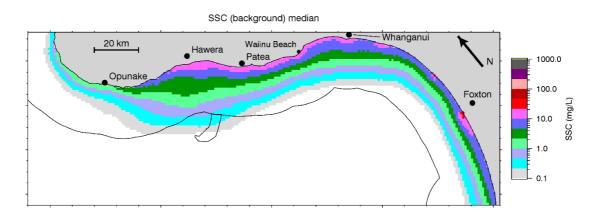


Figure 8: Background Suspended Sediment Concentration Median 2015

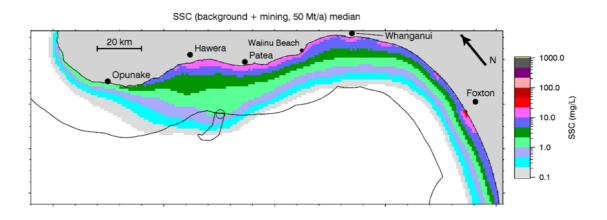
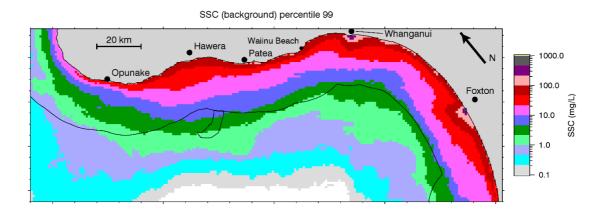
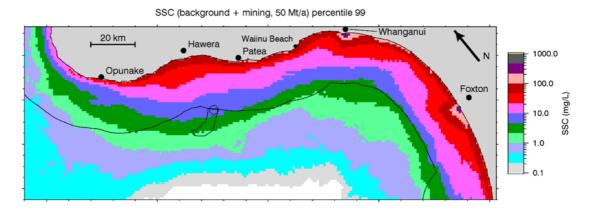


Figure 9: Background + Mining Suspended Sediment Concentration Median 2015







Figures 10 & 11: 99th Percentile Near-Surface Concentration of Suspended Sediment from Sediment Recovery (50 Mt/a) at the Nearshore Location. Top: Background SSC; Bottom: Background Plus Mining-Derived SSC.







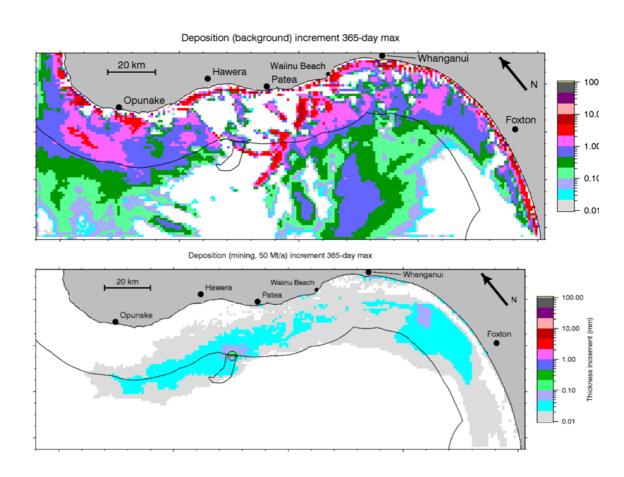






Deposition

The figures in this section show rates of sediment deposition associated with the suspended sediment source at the most inshore location (i.e. just outside the 12 nautical mile limit). The deposition footprint of iron sand recovery-derived sediment is widespread but at very low values of 0.01–0.05mm, (i.e. tenth of a thickness of a human hair). The deposition of iron sand recovery derived sediment could therefore only be able to be distinguished from the background within a few kilometres of the source.



Figures 12 & 13: Max Sediment Deposition 365 day



4.3 Optical Model

The optical model takes inputs of the concentration of sediment as predicted by the updated hydrodynamic model of Hadfield & Macdonald (2015). The sediment recovery-derived sediment is modelled in three categories of settlement rates (0.01, 0.1, and 1 mm/s), to take account of the effects of flocculation (Hadfield & Macdonald 2015). The method of assessment is contained in Figure 16 below.

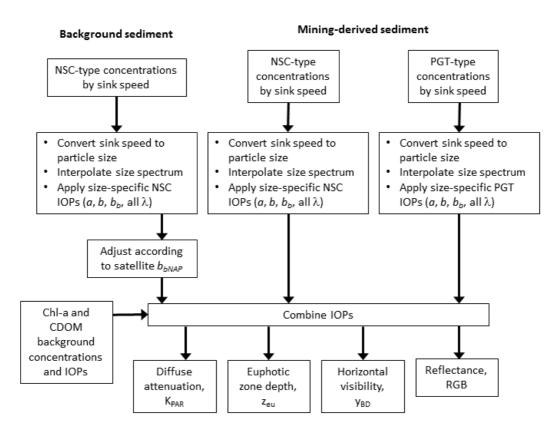


Figure 14: Optical Model

Optical effects were predicted based on iron sand recovery at two different representative locations (Site A, which is located at the inner limit of the proposed operations, close to the 12 nautical mile limit and Site B, which is located at the outer extent of the proposed operation)













Optical Model Results

The optical model predicted the following:

The optical effects of mining are likely to cease very quickly after mining ceases;
There is substantial natural variability in optical properties in the modelled area with greater
turbidity at the coast;
The optical effects of the plume decrease away from the iron sand recovery operations;
The optical effects of the plume will be greater in the offshore area than in the nearshore
area with effects being minimal close to the coast (i.e. within approximately 5km of the
coast;
Average light in the water column averaged over the domain of the sediment model (an area
of 13,000km²) is predicted to be reduced by only a small amount - approximately 1.9% based
on ore recovery at Site A and 1.6% based on ore recovery at Site B; and

☐ The total amount of light received by the seabed in the domain of the sediment model is predicted to reduce by 23% (Site A) and 16% (Site B), and this reduction will occur primarily east of the proposed iron sand recovery operation.

5. Additional Reports and Surveys

5.1 Zooplankton Communities and Surface Water Quality in the South Taranaki Bight February 2015

Zooplankton communities in the South Taranaki Bight were well assessed in the 1970s and 1980s, with 90 stations sampled over a period of 13 years. This resulted in the DMC on the previous marine consent application questioning the relevance of the older data to a modern assessment of iron sand recovery impacts. Moreover, most of the sampling stations (83%) were in depths > 50 m offshore of the sediment recovery stations, with just a few from the areas likely to be affected by sediment plumes from the proposed activities.

In light of the above, TTR contracted NIWA to sample zooplankton communities from the sea surface to the sea floor, and take and analyse surface water samples for components affecting water clarity, at 16-20 stations along the length and across the width of the area potentially affected by the sediment plume. Weather conditions allowed this sampling to take place in mid-February 2015.

The zooplankton community sampled in February 2015 is typical of the nearshore zooplankton communities found around the North Island. Its specific composition closely resembles Zooplankton Geographic Group III that occurred in the same area in the 1980s, thus verifying the relevance of the 1970s and 1980s data to a modern assessment of sediment recovery impacts.













5.2 Assessment of the Scale of Marine Ecological Effects of Seabed Sediment Recovery in the South Taranaki Bight

TTR commissioned NIWA to provide an overview of the effects of the proposed iron sand recovery activities on key zooplankton, fish, seabird, kaimoana, and marine mammal species, taking into account the spatial and temporal scales relevant to different components of the ecosystem, particularly addressing matters of uncertainty relating to those effects. This assessment has utilised the latest sediment transport and optical modelling results (as summarised above).

Assessment of Impact

The effects or consequences of the proposed iron sand recovery activities were evaluated for each component of the ecosystem being considered and scored using a standardised set of "consequence descriptions". These take into account the proportion of habitat relevant to the species or group in question affected by iron sand recovery activities, the severity of the impact on the population, community, or habitat, and the recovery period once the impact ceases.

The effects taken into account in this study were:

clogging of respiratory surfaces and feeding structures of marine organisms;
avoidance of the discharge area by mobile species; and
reduced availability of prey due to either reduced underwater visibility or a reduction in prey
numbers or hiomass

The review used ecologically consequential concentrations of suspended sediment of 2mg/l as a conservative minimum threshold for all pelagic species of fish and invertebrates, sea birds, and marine mammals, and 3mg/l as a conservative threshold for all demersal and benthic species of fish and invertebrates.

This review and assessment of the spatial and foraging ecology of the key fauna occurring in the South Taranaki Bight has identified that the environmental effects due to the proposed iron sand recovery operations for all zooplankton, seabird, and marine mammal species, and most fish species will be negligible.

This report summarises the detail findings with respect to fish and whales below. Detailed findings for each of the key fauna can be referenced in the full report.













Commercial and Recreational Fish Species

Of the commercial and recreational fish species commonly occurring (% occurrence >50%) in the South Taranaki Bight (STB) all pelagic species and all but one of the demersal and benthic species will be negligibly affected by the proposed iron sand recovery operations. Because:

- □ iron sand recovery activities comprises less than 1% of their area of distribution in their Quota Management Area;
- ☐ individuals are relatively mobile, and occur either close inshore in areas already subject to high background levels of suspended sediment concentrations, or principally offshore of the area impacted by iron sand recovery; and
- □ NIWA concluded that any displacement of fish or decrease in prey abundance or availability due to the proposed iron sand recovery activities will have negligible effects on the state of their stocks.

The only exception is the eagle ray. Although the area potentially impacted by iron sand recovery activities comprises less than 1% of the area of distribution of eagle ray in Fisheries Management Area 8, about 8% of its core area of distribution (>50% occurrence) overlaps with the area of suspended sediment concentrations elevated above 3mg/l. Using this threshold a minor to moderate proportion of the stock could be affected by iron sand recovery activities through displacement of fish, or decrease in prey abundance or availability.

During summer and autumn eagle rays tend to concentrate inshore in water less than 10m deep where background suspended sediment concentrations may naturally reach over 100mg/I (Hadfield et al. 2015). This means that eagle rays may be tolerant to suspended sediment concentrations significantly higher than the threshold of 3mg/I used to assess the impact of suspended sediment concentrations elevated by the proposed iron sand recovery activities. As such the above assessment is an over-estimation of the effects on eagle rays.













Kaimoana Species

The kaimoana species fished or gathered in the South Taranaki Bight were divided by NIWA into three groups on the basis of their ecology and where they were located. In the first group are five fish species occurring close inshore or penetrating reaches of the river systems in the region, and a large number of invertebrate species fished or gathered from intertidal and shallow sub-tidal parts of rocky reefs or muddy or sandy shores where the waters are commonly naturally turbid. The fish include kanae (grey mullet), patiki mohoao (black flounder), tuna heke (long finned eel), tuna roa (short finned eel), and paraki/ngaiore (common smelt). The invertebrates include koeke (common shrimp), kaunga (hermit crab), papaka parupatu (mud crab), papaka (paddle crab), waikaka (mudsnail), pipi, purimu (surfclams), tuangi (cockle), tuatua, kotore or humenga (sea anemone), kina (sea urchin), patangatana (starfish), karaura (rock oyster), kutae/kuku (green lipped and blue mussel), pupu (cats eye), rori (sea-snail), paua and hihiwa (black- and yellow-foot paua), kaeo (sea tulip), and waharoa (horse mussel). Given that their main area of distribution in the STB is close inshore in naturally turbid water, or in freshwater rivers, they will not be affected by the iron sand recovery activities and any displacement of fish or decrease in prey abundance or availability due to iron sand recovery will, according to NIWA, have no or negligible effects on the state of their stocks.

The second group includes two species, hapuka (groper), and para (frostfish), with a broad distribution in the STB but with their centre of distribution in deeper offshore waters, and seven other species including kuakua (scallop), and rore/rori (sea cucumber), moki (blue moki), patiki rore (New Zealand sole), patiki totara (yellowbelly flounder), patiki (sand flounder), and reperepe (elephantfish) occurring mainly in depths less than 50m. Given that the area of SSC concentrations elevated over background levels by the proposed iron sand recovery operations comprises less than 1% of the area of distribution of these species in Fisheries Management Area 8, any displacement of individuals or decrease in prey abundance or availability due to the proposed iron sand recovery activities has been assessed by NIWA to have negligible effects on the state of their stocks.

In the third group is rocky reef, demersal or benthic species occurring mainly close inshore but with their distributions extending across the inner part of the shelf to depths of 50m wherever suitable habitat occurs. This group includes marari (butterfish), koiro (conger eel), koura (rock lobster or crayfish), and wheke (octopus). Although their populations close inshore will be largely unaffected by iron sand recovery, it is possible that individuals occurring at or near the recovery site or areas affected by the near seafloor sediment plume, could be displaced or experience a decrease in food abundance or availability. However, for each species the impact on their overall population will be negligible.













Marine Mammals

Blue Whales

Blue whales have been predominately sighted in the western entrance to the South Taranaki Bight between the 50 and 150m bathymetric contours. A dedicated aerial cetacean survey over two years failed to detect any blue whales in the vicinity of the proposed iron sand recovery areas, which the Joint Statement of Experts in the Field of Effects on Marine Mammals including Noise concluded may represent the edge of the blue whale feeding grounds in the South Taranaki Bight as part of the consideration of TTR's first marine consent application.

The potential feeding area of blue whales in the South Taranaki Bight is approximately 29,930km² if areas shallower than 25m are excluded. NIWA has determined that given the areas where suspended sediment concentrations are elevated above 2mg/l due to the proposed iron sand recovery represents only 0.2% of this potential feeding area, and lies on the margins of blue whale feeding grounds. Therefore the assessment, which is based on the best available information, shows that any displacement of blue whales or decrease in krill abundance or availability due to iron sand recovery will have negligible effects on blue whales while in the South Taranaki Bight.

Southern Right Whales

Given that southern right whales are unlikely to be feeding on locally available prey during the period they transit through the inshore waters of the South Taranaki Bight, and that modelling predicts that the majority of the South Taranaki Bight is unfavourable habitat for southern right whales during the winter calving, suckling and migration period, NIWA considered that the proposed sediment recovery activities will not affect this species.

Killer Whales

The majority of the South Taranaki Bight is regarded as only moderately favourable habitat for killer whales, with its prey species occurring over a wide area in the South Taranaki Bight.

The proposed iron sand recovery activities are assessed not to cause any measurable displacement, or decrease prey abundance or availability during the periods that killer whales visit the region.

Hector's Dolphin

The majority of the South Taranaki Bight is unfavourable habitat for Hector's dolphins - demonstrated by the near absence of sightings of Hector's dolphins in the region. The preference of Hector's dolphin for areas of low water clarity, and the likely negligible effects of iron sand recovery activities on stocks of prey species, means that sediment recovery is assessed not to have any effects on this species.













Common Dolphins

Common dolphins have a wide distribution and wide ranging movements around New Zealand. NIWA has concluded that any displacement of common dolphins, or decrease in prey abundance or availability due to proposed iron sand recovery will have negligible effects on the status of the common dolphin population in the South Taranaki Bight.

Pilot Whales

Pilot whales have a wide distribution and wide ranging movements around New Zealand. Any displacement, or decrease in prey abundance or availability due to sediment recovery activities will, according to NIWA, have negligible effects on the status of the pilot whale populations.

5.3 Effects on Primary Production of Proposed Iron Sand Sediment Recovery in the South Taranaki Bight Region

This assessment addresses the impact on primary productivity that would result from the release of sediment into the water column. The increased suspended sediment in the water column will affect the optical properties of the water, specifically its clarity and colour, which may, in turn, affect biota. The optical effects of iron sand recovery (as distinct from "mass effects") include changes to light attenuation, which affects the amount of primary production (PP) by reducing light availability for algae in the water and on the seabed.

The optical models have been rerun and the results carefully reviewed by TTR's local and offshore advisors. The key results of their new assessment are as follows:

□ Light in the water column, integrated over the modelled area and averaged by year, is predicted to be reduced by 1.9% (iron sand recovery at Site A) and by 1.6% (iron sand recovery at Site B);
 □ Under "natural" conditions, about 28.6% of the seabed of the modelled area receives more than 0.04 mol photons m⁻²d⁻¹. This is an estimate of the approximate minimum light requirements for MPB to grow (Gattuso et al. 2006) (though it is possible that MPB can grow at lower light levels than this). The area is predicted to reduce to 27.1% overall (iron sand recovery at Site A) and to 27.3% overall (iron sand recovery at Site B);
 □ The total amount of light at the seabed over the whole modelled area averaged over a year is predicted to reduce by 23% (iron sand recovery at Site A) and by 15% (iron sand recovery at Site B); and
 □ Most of the reduction in sea bed light is predicted to occur in a band spreading east from the location of iron sand recovery.













Based on the prediction of the optical model, estimates of likely reductions in primary production ("PP") by phytoplankton in the water column and PP by macroalgae (seaweed) and microphytobenthos (MPB) on the seabed were made, using values taken from the international literature. Five changes are considered in the context of assessing the optical effects of iron sand recovery on the ecology of the SMD:

	Changes to PP in the water column by phytoplankton;
	Changes to PP by macroalgae;
	Changes to PP on the seabed by microphytobenthos;
	Changes to total PP (i.e., the sum of all sources of PP); and
	Changes to energy flow to the seabed ecosystem. Energy available to animals in/on the seabed comes from the combination of local (seabed) PP and the transfer (flux) of organic matter from the water column to the seabed.
	ises it was not possible to predict changes to absolute production, rather estimates are based portional changes to the background condition.
	lowing issues are fundamental when estimating the possible changes in PP resulting from effects, and none of these is well known:
	The degree to which photo-saturation and photo-adaptation by phytoplankton and MPB will offset the effect of reductions in light on PP;
	The relative importance of MPB and phytoplankton for total PP in the SMD. PP by phytoplankton will dominate, but the contribution of PP from MPB is not well known; and
	The proportion of the total flux of organic carbon to the benthic ecosystem that is due to sedimenting water column carbon compared to advected or local benthic production by MPB.
_	optical modelling results and expert estimates for the above factors, TTR's advisors predict in sand recovery will:
	Reduce water column PP averaged over the modelled area by 1.0% (iron sand recovery at Site A) and by 0.8% (iron sand recovery at Site B);
	Likely have small effects on macroalgal production. The distribution of macroalgae is poorly
	known for much of the modelled area, and effects are hard to predict quantitatively.
	However,knownmacroalgalhabitats,includingtheTraps,areinareaswheretheimpactsof
	the iron sand recovery operations are predicted to be small;
	Reduce benthic PP averaged over the modelled area by 19% (iron sand recovery at Site A) and 13% (iron sand recovery at Site B);













- □ Reduce total (i.e. water column plus seabed) PP averaged over the modelled area by 1.9% (range 1.6–2.2%) due to iron sand recovery at Site A, and by 1.4% (range 1.2–1.7%) due to iron sand recovery at Site B; and
- Reduce energy flow to the seabed ecosystem averaged over the modelled area by 5.8% (range 3.1–11.9%) by iron sand recovery at Site A, and by 4.1% (range 2.3–8.3%) by iron sand recovery at Site B.

The proportional reduction in benthic PP, and hence fixed carbon flux to the seabed, is expected to occur mostly in an area east of the iron sand recovery operations, where the "median plume" is predicted to move over a relatively shallow (20-40m deep) sandy area, which forms part of the Patea Banks. Here, area-specific reductions of carbon flux to the benthos of up to 40% can be expected.

The optical effects of iron sand recovery on PP by phytoplankton and by MPB are expected to cease shortly after operations stop. As suspended sediment from iron sand recovery operations is fully flushed out of the modelled area (a process predicted to take a few months; Hadfield, 2013) phytoplankton and benthic biomass and PP are estimated to quickly return to background levels.

There is high interannual variability in PP by phytoplankton in the modelled area. Satellite data show that the annual-average chl-a has a standard deviation of 18%. Background interannual variability in phytoplankton PP is likely to be of a similar magnitude. This means that a sustained decrease in phytoplankton PP of 1% due to iron sand recovery operations is very unlikely to lead to ecosystem regime shift (a regime shift is where the community undergoes a fundamental structural change).

There is also high interannual variability in the amount of light reaching the seabed in this locality. Satellite-derived estimates show that the annual-average total light reaching the seabed in the modelled area has a standard deviation of 25%, with annual-averages of between +36% to -32% of the long term mean. This suggests that receiving communities are predisposed to tolerate interannual variability in benthic photosynthesis of magnitudes similar to that expected from iron sand recovery (15–23%), though it will exacerbate low light episodes. Iron sand recovery is unlikely to lead to unnaturally low benthic production in the modelled area that is outside of the envelope of background variability in any given year.

Additional effects of iron sand recovery operations (effects of sediment deposition on the bottom on MPB production and effects of nutrient pore water release by seabed disturbance) are considered to be insignificant, based on modelling and literature information, respectively.













The analyses of the field data, coupled with modelling of the character of the sediment plume from iron sand recovery operations, its trajectory and duration, and its optical effects, and the analyses of these effects on primary production in the modelled area strongly support the conclusion that the overall effects of iron sand recovery on short-lived organisms (living less than a year or two) will be indistinguishable within natural oceanographic variability. Effects at local scale proximal to the iron sand recovery operations will be limited to decreases in MPB production and organic carbon availability to benthic consumers. This may exceed natural variability and may propagate locally to organisms that feed primarily on MPB and in turn to their predators.

Further refinement of the above assessments would require collecting substantial additional field data, particularly regarding the magnitude of benthic production across the Patea Banks. The inherent variability in the relevant oceanographic variables and the dynamic nature of the South Taranaki Bight itself, mean that this would require a long and expensive field campaign. TTR's advisors do not consider this to be necessary and have expressed confidence that their assessments represent sound science that lie well within the bounds of reasonable probability.

6. OVERALL SUMMARY

The re-modelling by NIWA and subsequent interpretation of effects following the scientific assessments undertaken by internationally recognised experts fundamentally recasts the understanding of the scale and extent of the potential environmental effects associated with the recovery of iron sand from the seabed of the South Taranaki Bight. The plume associated with iron sand recovery will produce changes in sediment concentrations that are within the range of natural variability at the scale of the modelled domain or the wider South Taranaki Bight and will not result in any ecologically significant adverse effects on primary productivity or fixed carbon flux to marine ecosystems at the large scale. Significant localised effects may occur but these would be patchy and episodic in nature and the ecosystem would recover once the recovery activities progress or stop.

TTR looks forward to discussing the project and answering any questions regarding the new modelling and scientific assessments with key stakeholders. A representative of TTR will make contact with you in the near future to arrange a convenient time to commence these discussions.













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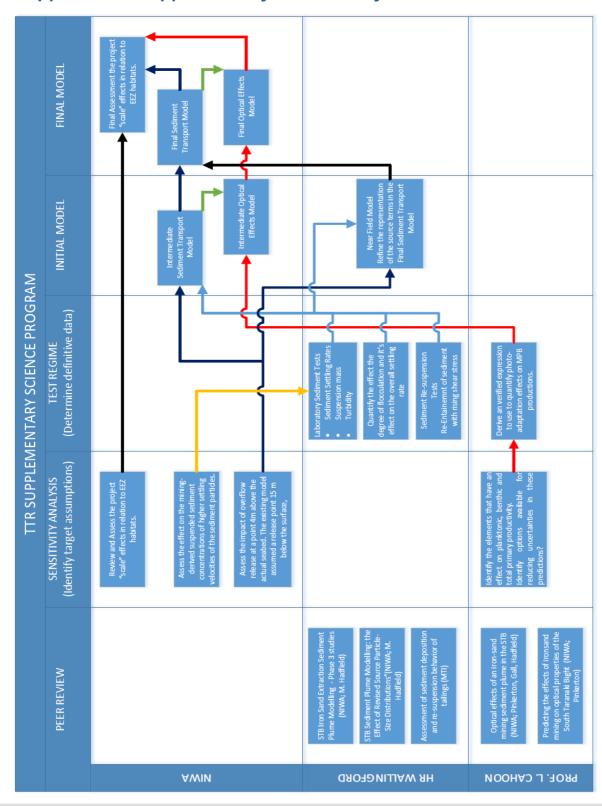








8. Appendix 1: Supplementary Science Layout



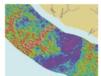


TTRL OFFSHORE IRON SANDS PROJECT

ECONOMIC IMPACT ANALYSIS SUMMARY













1. INTRODUCTION

Martin Jenkins was engaged in 2015 to undertake an economic impact analysis of Trans-Tasman Resources Limited's (TTR) proposed iron sands project on the local (South Taranaki/Whanganui), regional (Taranaki/Whanganui), and national (New Zealand) economies. The economic impact is assessed by applying regional Input-Output Multipliers to TTR's projected operational expenditure in several industry areas in order to measure the direct, indirect and induced GDP and employment impacts.

The economic impact analysis shows that TTR's proposed iron sands project will have a positive economic impact on the South Taranaki, Whanganui and New Plymouth districts as well as contributing to the New Zealand economy through royalties, taxes and export earnings. The project complements existing industries in the region and will encourage high value economic activity in an area facing economic decline.

2. PROJECT

The iron sands project aims to extract iron ore from iron sand on the Taranaki Bight, in an area which is from 22 to 37 kilometres off the coast of South Taranaki. The iron ore will then be exported to international markets. TTR has a 20 year mining permit and the project is expected to extract 5 million tonnes of iron ore per annum.

The operational expenditure for the project is estimated be about \$254 million annually. About \$133 million of that annual expenditure will be spent in New Zealand. Of that about \$73 million is expected to be spent in the Taranaki/Whanganui region, with \$35 million spent directly in the South Taranaki and Whanganui districts each year.

2.1 Study area

The analysis looked at the economic activity within three study areas – local, regional and national. The local study area consists of South Taranaki and Whanganui. It is where the iron sands operations will occur. The regional study area is made up of four local authorities - South Taranaki, Whanganui, Stratford, and New Plymouth. A large portion of expenditure will be within this regional study area. The national study area is New Zealand.













3. LOCAL DEVELOPMENT

The main area of activity is likely to be in South Taranaki and Whanganui. This is a relatively small economy in a rural area where the effects of a project will have a noticeable impact on the local economy, particularly as new jobs are generated. While there is oil and gas and extraction activity in South Taranaki, much of this is serviced out of New Plymouth, limiting the benefits to the local region.

TTR has indicated that it is looking to have as much positive impact on the local area as it possibly can. This includes establishing support functions in the rural area (rather than basing it in New Plymouth), utilising local services where possible (i.e. engineering services), and working with the community to encourage participation from the local workforce.

TTR recognises the benefits to the operation and to the region from employing local people where feasible. Investing in training to employ local people will benefit the individuals, the community, and ultimately the project itself.

TTR envisages that, at project initiation, approximately 30 percent of all TTR employed persons would be New Zealand citizens with approximately 10 percent of those being from local South Taranaki and Whanganui communities. It is TTR's aspiration that after five years of operation, sufficient technology and skills transfer has taken place that 80 percent of the people employed directly will be New Zealand citizens and that a significant proportion of those would be from South Taranaki/Whanganui communities.

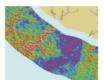
To achieve this, TTR is exploring the possibility of basing a training school in South Taranaki, working with an ITP and regional businesses to assess the viability.

Long term, main contractors and service suppliers will also be required to ensure a progressively increasing local quota with regards to people employed within their organisation working on the TTR operation. These contractors and service suppliers will also be required to include local firms on tender lists.

The Geotechnical Services Vessel would be based out of Whanganui harbour, with its supporting onshore activities also based in Whanganui, providing much needed activity in the local area. A potential opportunity exists to develop a heli-port in Hawera or Opunake, which would provide services to offshore activity.













4. THE ECONOMIC IMPACT

The analysis is underpinned by projected operational expenditure from the project in several study areas and applying established regional Input-Output Multipliers to measure the direct, indirect and induced GDP and employment impacts.

The total economic impact of the iron sands project on the local, regional and national economies is shown in the following table. Expenditure and GDP are per annum, while Employment is the number of jobs supported.

Total im pact by study area	Expenditure \$m		
Local	45.1	18.6	299
Regional	115.7	50.6	705
National	349.1	159.0	1,666

Source: Martin Jenkins

Local (South Taranaki/Whanganui)

The iron sands project is expected to generate about \$18.6 million in GDP and employ 299 people in the South Taranaki/Whanganui economy each year over 20 years.

Regional (Taranaki/Whanganui)

The iron sands project is expected to generate about \$50.6 million in GDP and employ 683 people in the Taranaki/Whanganui economy each year over 20 years.

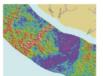
New Zealand

The iron sands project is expected to generate about \$159 million in GDP and employ 1,666 people in the New Zealand economy each year over 20 years.

The project will also contribute to government income through royalties and taxes and to New Zealand's export earnings. At a conservative price of US\$40/tonne and a NZ\$/US\$ exchange rate of \$0.65, the project would contribute \$6.15 million in royalties and about \$312 million in export earnings each year. Government would also collect taxes from the venture.













The price of iron ore is unlikely to affect the economic impact analysis. The bulk of the economic impacts arise from the expenses associated with the project. Price rises will lead to greater royalties, taxes and profits, but these are less important contributors to economic impact than operational costs. If iron ore prices fall, the royalties, taxes and profits will decline, but the economic impact will continue to occur until the price falls below the break-even point for a prolonged period forcing the project to cease operations.

5. WIDER BENEFITS

The iron sands project will have a significant effect on the South Taranaki and Whanganui economies. It would add to the diversification of economic activity in the region, which is heavily reliant on the oil and gas and dairy sectors. This would improve the resilience of the region, where the key sectors are prone to global commodity prices and cycles. At the same time, the services required by the project are complementary to existing services demanded in the region, ensuring that local businesses will participate in and benefit from the activity. The location of the project in South Taranaki and Whanganui would encourage much needed activity in an area that is not performing well economically.

We at TTR are well aware of the potential to make a meaningful contribution to the local economy. We recognise that a local focus will make for a more stable and successful business. We are seeking to encourage and support as much local engagement as reasonably and financially possible, both with regards to our own activity and also the services we purchase from out-of-region providers. Own activities include encouraging servicing activity within the area, exploring the potential for setting up a training facility, and local labour content targets. Our main suppliers will also be set local labour content targets.

6. REFERENCES

MartinJenkins 2015, "ECONOMIC IMPACT ANALYSIS OF THE IRON SANDS PROJECT" South Taranaki/Whanganui; Taranaki/Whanganui; New Zealand

Appendix 7.3: Community consultation 2024-2025



Trans-Tasman Resources

Community Consultation

2024-2025

Summary of engagement	Page 2
Local Authorities	
New Plymouth District Council Mayor Neil Holdom	Page 10
Stratford District Council Mayor Neil Volzke	Page 14
South Taranaki District Council Mayor Phil Nixon	Page 17
Taranaki Regional Council former Chair Charlotte Littlewood	Page 19
Whanganui District Council Mayor Andrew Tripe	Page 22
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MPs	
New Plymouth MP David MacLeod	Page 30
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Other	
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Trans-Tasman Resources Limited PO Box 10 571, Wellington 6143 NEW ZEALAND



Trans-Tasman Resources

Summary of engagement with stakeholders

August 2024 to March 2025

Date	Type of Engagement	Comment
29 August 2024	Email to Arun Chaudhari, Taranaki Chamber of Commerce	Note thanking Arun for the call and providing some background to the project
30 August 2024	Email from Arun Chaudhari	Note from Arun Chaudhari thanking Alan Eggers for his call and update on the project
2 September 2024	Email letter to Nathan Turner of Blue Float	Note with attached letter saying NZ's interests best served by TTR working with OWE developers to enable both activities to occur in the South Taranaki Bight and seeking a meeting
2 September 2024	Email letter to Simon Currie of Energy Estate	As above
2 September 2024	Email letter to Andy Evans of Ocean Ex Energy	As above
2 September 2024	Email letter to Peter Spencer of Park Wind	As above
2 September 2024	Email letter to Hinata Kadowaki of Sumitomo Group	As above
2 September 2024	Email letter to Giacomo Caleffi of Taranaki Offshore Partnership	As above
2 September 2024	Email letter to Pat Omeara of Wind Quarry	As above

 $\textbf{Website:}\ \underline{www.manukaresources.com.au}$

		1
2 September 2024	Email to Kelvin Wright and Anne Probert, Venture Taranaki	Note and sample of letter sent to potential offshore wind energy developers as a courtesy
5 September 2024	Email to Kelvin Wright	Note with presentation attached that outlines the project, including a video
13 September 2024	Email to Kelvin Wright	Note with attachment of jobs created by the proposed Taranaki VTM project
16 September 2024	Email to Kelvin Wright	Note with TTRs media statement in response to the government's intention to establish a critical minerals list
18 September 2024	Teams meeting	Alan meeting with Venture Taranaki's Kelvin Wright and Anne Probert to brief them on the project, answer questions and seek VT's support to arrange meetings
20 September 2024	Email to Kelvin Wright and Anne Probert	Note with background information to share with mayors prior to meeting
23 September 2024	Teams meeting	Alan meeting with Taranaki Mayoral Forum (New Plymouth Mayor Neil Holdom, Taranaki Regional Council Chair Charlotte Littlewood, Stratford District Mayor Neil Volzke and South Taranaki District Council Mayor Phil Nixon) and Venture Taranaki to brief them on the project and answer questions
24 September 2024	Email to Kelvin Wright	Note to Kelvin thanking him for organising the meeting, with attached poll result and

	<u> </u>	set of conditions previously
		agreed with the Environment Protection Authority
24 September 2024	Email to Kelvin Wright	Note to Kelvin with attached information on Department of Conservation position on previous TTR application
27 September 2024	Email from Nathan Turner	Note to Alan Eggers declining a meeting on the basis of milestones that need to happen
27 September 2024	Email from Peter Spencer	Exact same note as above to Alan Eggers
27 September 2024	Email from Kosuke Shiraji	As above
27 September 2024	Email from Giacomo Caleffi	As above
6 October 2024	Email to Kelvin Wright	Note with fact sheet on Taranaki VTM project attached
6 October 2024	Email letter to Neil Holdom, New Plymouth Mayor	Request to meet in New Plymouth
17 October 2024	Email to Kelvin Wright	Note with request to meet with Taranaki iwi leaders forum
23 October 2024	Email letter to David Macleod, New Plymouth MP	Letter to thank David for his call and to provide information on offshore wind energy
28 October 2024	Face-to-face	Alan meets with Matthew Ries to see how Wood Training may support TTR's activities
28 October 2024	Face-to-face	Alan meets with Port Taranaki CEO Ross Dingle to discuss how TTR's project can support development of the Port's infrastructure

Trans-Tasman Resources Limited PO Box 10 571, Wellington 6143 NEW ZEALAND

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28 October 2024	Face-to-face	Alan meets with Federated Farmers Board member and Taranaki representative Mark Hooper to brief him on the project and answer questions
28 October 2024	Face-to-face	Alan meets with New Plymouth Mayor David Macleod and his staff to brief them and answer questions on the project
29 October 2024	Face-to-face	Alan meets with New Plymouth Mayor Neil Holdom to brief him on the project and answer questions
29 October 2024	Face-to-face	Alan meets with South Taranaki District Council Mayor Phil Nixon to brief him on the project and answer questions
5 November 2024	Teams meeting	Alan meets with Whanganui MP Carl Bates to brief him on the project and answer questions
5 November 2024	Email to Neil Holdom	Thank you letter for the meeting and offering to keep updated
5 November 2024	Email to Phil Nixon, South Taranaki District Council Mayor	Thank you letter for the meeting and outline intention to follow-up on training facility
5 November 2024	Email to David Macleod	Thank you letter for the meeting and offering to keep updated
11 November 2024	Email to Carl Bates, Whanganui MP	Follow up note following Teams meeting with Carl, providing further information

		on journey to date and the court summaries
13 November 2024	Email to Andrew Tripe, Whanganui Mayor	Note to apologise for lack of communication from TTR and offering meeting
14 November 2024	Email from Carl Bates	Thank you note from Carl Bates for the further information
18 November 2024	Teams meeting	Alan meets with Patea Community Board Chair Jacq Dwyer to brief her on the project and answer questions
19 November 2024	Email to Jacq Dwyer, Patea Community Board Chair	Note to thank her for the meeting
19 November 2024	Email from Jacq Dwyer	Note to thank for the meeting, confirm her opposition and also her willingness to discuss
26 November 2024	Teams meeting	Alan meets with Whanganui Mayor Andrew Tripe to brief him on the project and answer questions
27 November 2024	Teams meeting	Alan meets with Rangitikei MP Suze Redmayne to brief her on the project and answer questions
12 December 2024	Email to Andrew Talley, Talley's Group CEO	Note with attached letter asking to meet and resolve a way to work together in South Taranaki Bight
13 December 2024	Email from Andrew Talley	Note thanking for letter and passing request to meet to Doug Loder
24 January 2025	Face-to-face	Alan and John meet with Talley's representative Doug Loder and Talley's legal

		representatives to discuss how we could work together in the South Taranaki Bight
28 January 2025	Email from Carl Bates	Note from Carl Bates asking a question about royalties
28 January 2025	Email to Carl Bates	Note in response to Carl Bates' question
30 January 2025	Email sent to Arun Chaudhari	Letter update on TTR's fast- track application progress
30 January 2025	Email sent to Barbara Kuriger, Taranaki-King Country MP	Letter update on TTR's fast- track application progress
30 January 2025	Email sent to Carl Bates	Letter update on TTR's fast- track application progress
30 January 2025	Email sent to David Macleod	Letter update on TTR's fast- track application progress
30 January 2025	Email sent to Kelvin Wright	Letter update on TTR's fast- track application progress
30 January 2025	Email sent to Matthew Ries, Wood Training CEO	Letter update on TTR's fast- track application progress
30 January 2025	Email sent to Ross Dingle, Port Taranaki CEO	Letter update on TTR's fast- track application progress
30 January 2025	Email sent to Suze Redmayne, Rangitikei MP	Letter update on TTR's fast- track application progress
30 January 2025	Email sent to Jacq Dwyer	Letter update on TTR's fast- track application progress
30 January 2025	Email sent to Neil Holdom	Letter update on TTR's fast- track application progress
30 January 2025	Email sent to Neil Volzke, Stratford District Council Mayor	Letter update on TTR's fast- track application progress
30 January 2025	Email sent to Andrew Tripe	Letter update on TTR's fast- track application progress

30 January 2025	Email from Barbara Kuriger	Thank you note from Barbara
30 Juliuary 2020	Emait nom barbara Kungel	Kuriger for the update
30 January 2025	Email from Carl Bates	Thank you note from Carl Bates for the update
30 January 2025	Email from Ross Dingle	Thank you note from Ross Dingle for the update
31 January 2025	Email to Alan Eggers	Thank you note from Neil Volzke
31 January 2025	Email to Alan Eggers	Thank you note from Jacq Dwyer, that also affirms her opposition to the project
31 January 2025	Email from Arun Chaudhari	Thank you note for the project update
4 February 2025	Email to Kelvin Wright	Note with attached draft 'economic assessment' report
10 February 2025	Email sent to Neil Holdom	Letter update on economic assessment of TTR's project, requesting meeting
10 February 2025	Email sent to Andrew Tripe	Letter update on economic assessment of TTR's project
10 February 2025	Email sent to Phil Nixon	Letter update on economic assessment of TTR's project
10 February 2025	Email sent to Mark Hooper, NZ Federated Farmers Board member and Taranaki representative	Letter update on economic assessment of TTR's project
10 February 2025	Email from Andrew Tripe	Note to advise that the benefits to Whanganui are unclear in economic assessment report
11 February 2025	Email sent to Charlotte Littlewood, Taranaki Regional Council Chair	Letter update on economic assessment of TTR's project

11 February 2025	Email sent to Neil Volzke	Letter update on economic
		assessment of TTR's project
11 February 2025	Email from Charlotte	Thank you note from
	Littlewood	Charlotte
11 February 2025	Email to Kelvin Wright	Note with attached
		'economic assessment
		impact' report
12 February 2025	Email from Charlotte	Note to advise she has
	Littlewood	resigned as Chair of Taranaki
		Regional Council
19 February 2025	Email from Suze Redmayne	Note to thank for project
		update and comprehensive
		zoom briefing
6 March 2025	Email to Kelvin Wright	Note with attached 'Jack-Up
		Deployment' report
6 March 2024	Email to Hayden McKenzie,	As above
	NZTE Head of Energy	



10 February 2025

Mr Neil Holdom Mayor, New Plymouth District Council New Zealand

By email: neil.holdom@npdc.govt.nz

Dear Neil

TTR Taranaki VTM Project in South Taranaki Bight

I am writing to bring your attention to the latest information relating to the economic impact of our Taranaki VTM project to your region.

Please find attached the *Economic impact assessment of TTR's Taranaki VTM Iron Sands Project*, a report by the New Zealand Institute of Economic Research (NZIER) which we received on Friday (February 7).

I'm delighted to share it with you as it finds there will be 303 new jobs created by the project in the Taranaki Region and Whanganui District, with an annual direct spend of \$221 million.

NZIER estimates the project will increase New Zealand's GDP by \$250 million and employment by 1300 jobs, with more than 80% of this impact benefiting the Taranaki and Whanganui economies – or delivering \$205 million in annual GDP and 1100 jobs locally.

Taxes and royalties will also be significant, with royalties ramping up once capital has been paid down.

The figures align with the previous economic impact assessment prepared by Martin Jenkins in 2015.

There are considerable other local, regional and national benefits outlined in the report. It would be great to meet and discuss these, and update you on the other activities we are undertaking in preparation for our Fast Track application.

Thanks for your time.

Yours sincerely

Trans-Tasman Resources Limited

Alan J Eggers

Executive Chairman





30 January 2025

Mr Neil Holdom Mayor, New Plymouth District Council New Zealand

By email: neil.holdom@npdc.govt.nz

Dear Neil

TTR Taranaki VTM Project in South Taranaki Bight

I hope you have enjoyed a good summer and holiday break.

I just wanted to update you that Trans-Tasman Resources is preparing its application for the Taranaki VTM (seabed mining) project under the new Fast Track process, following the Fast Track Act's passing pre-Christmas.

The applications open at the end of next week and we plan to lodge our application for consideration in March.

We are updating and reviewing much of our previous material as part of the application process and, as we have discussed with you, are focused on meeting all the environmental conditions previously agreed to ensure that any effects are appropriately managed and mitigated.

If approved, we are confident the project will provide significant benefits to the wider Taranaki region.

I'm happy to answer any questions you have and will keep you updated with our progress.

Yours sincerely

Trans-Tasman Resources Limited

Alan J EggersExecutive Chairman





From: Alan Eggers <Alan.Eggers@ttrl.co.nz> **Sent:** Tuesday, 5 November 2024 2:00 pm **To:** Neil Holdom <neil.holdom@npdc.govt.nz>

Cc: Erica Guy <erica@lillisclark.com>

Subject: TTR Meeting

Hi Neil

TTR Meeting and Consultation

Thank you for taking the time to catch up over breakfast last week.

It was great to be able to meet in person to discuss the project, which continues to generate a lot of interest, political and media attention.

The project offers massive opportunities for your region with wide-ranging impacts and benefits.

While in the region I also took the opportunity to catch up with Ross Dingle Taranaki Port, Matthew Ries Wood Training, Mark Hooper Federated Farmers Taranaki, David MacLeod MP and Phil Nixon STDC.

We are now focused on preparing our application to progress under the Fast Track legislation once it is passed through Parliament, which we expect to happen prior to Christmas.

I will keep you updated on our activities and also welcome any questions you may have at any time. It's important you have the most accurate and reliable information.

Also, I'm always available to provide information and or meet with others that may from time to time provide feed back to you on our activities and proposed operation in the South Taranaki Bight.

Thanks again.

Cheers

Alan E



Alan J Eggers
Executive Chairman
TTR GLOBAL LIMITED

M: +61 4 1111 2101

E: alan.eggers@ttrl.co.nz

W: www.ttrl.co.nz



TTR's Taranaki VTM Project Meeting Request – 29/30 October 2024

Tēnā koe,

It was great to be able to meet online recently where I was able to outline Trans-Tasman Resources' project to mine the iron sands in the South Taranaki Bight for iron ore, vanadium and titanium. As I said, these are critical minerals in high demand as economies transition to renewable energy.

I also outlined the huge opportunity the project presents for the Taranaki region. The benefits include hundreds of local jobs, a \$250 million annual operational spend, much-needed infrastructure investment, the establishment of a logistics hub and training centre in Hawera, as well as a head office in New Plymouth. It will lift regional GDP significantly and also contribute strongly to New Zealand's export earnings.

Meeting Request:

When we met, I indicated a desire to meet face-to-face and to keep you updated on the project's status.

Later this month I will be in New Plymouth and would welcome the opportunity to meet and update you on developments, including our project being listed in the Fast Track legislation. It is likely our project, the Taranaki VTM, will go before an expert panel overseen by the Environmental Protection Authority (EPA) in 2025.

The meeting will also provide a chance to address any concerns and answer any questions you have.

It is important you keep up-to-speed with developments, understand the facts and the huge opportunity the project presents for New Plymouth and Taranaki.

I look forward to hearing from you and thank you for your time.

Nga mihi,

Alan Eggers
Executive Chairman



11 February 2025

Mr Neil Volzke
Mayor Stratford District Council
New Zealand

By email: nvolzke@stratford.govt.nz

Dear Neil

TTR Taranaki VTM Project in South Taranaki Bight

I am writing to bring your attention to the latest information relating to the economic impact of our Taranaki VTM project to your region.

Please find attached the *Economic impact assessment of TTR's Taranaki VTM Iron Sands Project,* a report by the New Zealand Institute of Economic Research (NZIER) which we received on Friday (February 7).

I'm delighted to share it with you as it finds there will be 303 new jobs created by the project in the Taranaki Region and Whanganui District, with an annual direct spend of \$221 million.

NZIER estimates the project will increase New Zealand's GDP by \$250 million and employment by 1300 jobs, with more than 80% of this impact benefiting the Taranaki and Whanganui economies – or delivering \$205 million in annual GDP and 1100 jobs locally.

Taxes and royalties will also be significant, with royalties ramping up once capital has been paid down.

The figures align with the previous economic impact assessment prepared by Martin Jenkins in 2015.

There are considerable other local, regional and national benefits outlined in the report. It would be great to meet and discuss these, and update you on the other activities we are undertaking in preparation for our Fast Track application.

Thanks for your time.

Yours sincerely

Trans-Tasman Resources Limited

Alan J Eggers

Executive Chairman



30 January 2025

Mr Neil Volzke Mayor Stratford District Council New Zealand

By email: nvolzke@stratford.govt.nz

Dear Neil

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I hope you have enjoyed a good summer and holiday break.

I just wanted to update you that Trans-Tasman Resources is preparing its application for the Taranaki VTM (seabed mining) project under the new Fast Track process, following the Fast Track Act's passing pre-Christmas.

The applications open at the end of next week and we plan to lodge our application for consideration in March.

We are updating and reviewing much of our previous material as part of the application process and, as we have discussed with you, are focused on meeting all the environmental conditions previously agreed to ensure that any effects are appropriately managed and mitigated.

If approved, we are confident the project will provide significant benefits to the wider Taranaki region.

I'm happy to answer any questions you have and will keep you updated with our progress.

Yours sincerely

Trans-Tasman Resources Limited

Alan J Eggers

Executive Chairman



From: Neil Volzke <nvolzke@stratford.govt.nz>

Sent: Friday, 31 January 2025 12:26 pm **To:** Erica Guy <erica@lillisclark.com>

Subject: RE: TTR update

Thanks Erica

Neil Volzke JP

District Mayor

Te Kaunihera ā Rohe ō Whakaahurangi | Stratford District Council

06 765 6099 | 027 631 7418 | stratford.govt.nz

63 Miranda Street PO Box 320 Stratford 4352 P.06 765 6099 stratford.govt.nz



From: Erica Guy <<u>erica@lillisclark.com</u>>
Sent: Thursday, 30 January 2025 12:25 PM
To: Neil Volzke <<u>nvolzke@stratford.govt.nz</u>>

Subject: TTR update

CAUTION: This email originated from outside the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hi Neil,

I hope you had a lovely summer break and are all set for a big year in 2025.

Please find attached an update from Alan in regards to Trans-Tasman Resources' plans.

Thanks for your time.

Cheers Erica



10 February 2025

Phil Nixon South Taranaki District Council Hawera

By email: phil.nixon@stdc.govt.nz

Dear Phil

TTR Taranaki VTM Project in South Taranaki Bight

I am writing to bring your attention to the latest information relating to the economic impact of our Taranaki VTM project to your district.

Please find attached the *Economic impact assessment of TTR's Taranaki VTM Iron Sands Project*, a report by the New Zealand Institute of Economic Research (NZIER) which we received on Friday (February 7).

I'm delighted to share it with you as it finds there will be 303 new jobs created by the project in the Taranaki Region and Whanganui District, with 77 of those being in the South Taranaki and Whanganui Districts.

It also found there will be an annual direct spend of \$221 million in New Zealand across a range of industries, and within that \$47 million will be spent in South Taranaki and Whanganui.

NZIER estimates the project will increase New Zealand's GDP by \$250 million and employment by 1300 jobs, with more than 80% of this impact benefiting the Taranaki and Whanganui economies – or delivering \$205 million in annual GDP and 1100 jobs locally.

Taxes and royalties will also be significant, with royalties ramping up once capital has been paid down.

The figures align with the previous economic impact assessment prepared by Martin Jenkins in 2015.

There are considerable other local, regional and national benefits outlined in the report. It would be great to meet and discuss these, and update you on the other activities we are undertaking in preparation for our Fast Track application.

Thank you for your time.

Yours sincerely

Trans-Tasman Resources Limited

Alan J Eggers

Executive Chairman



From: Alan Eggers <Alan.Eggers@ttrl.co.nz>
Sent: Tuesday, 5 November 2024 2:16 pm
To: Phil Nixon <phil.nixon@stdc.govt.nz>
Cc: Erica Guy <erica@lillisclark.com>

Subject: TTR Meeting

Hi Phil

TTR Meeting and Consultation

Thank you for taking the time to meet with me in your office last week.

It was great to be able to meet in person to discuss the project, which continues to generate a lot of interest, political and media attention.

The project offers massive opportunities for your region in South Taranaki with wide-ranging impacts and benefits.

As you know we have robust plans in place to mitigate our environmental impact and do right by the community.

While in the region I also took the opportunity to catch up with Ross Dingle Taranaki Port, Matthew Ries Wood Training, Mark Hooper Federated Farmers Taranaki, David MacLeod MP and Neil Holdom New Plymouth.

We are now focused on preparing our application to progress under the Fast Track legislation once it is passed through Parliament, which we expect to happen prior to Christmas.

I will keep you updated on our activities and also welcome any questions you may have at any time. It's important you have the most accurate and reliable information. As well, we will be keen to follow up on your training facility initiative in Hawera and work together on making it a reality.

Also, I'm always available to provide information and or meet with others that may from time to time provide feed back to you on our activities and proposed operation in the South Taranaki Bight.

Thanks again.

Cheers

Alan E

Alan J EggersExecutive Chairman

TTR GLOBAL LIMITED

M: +61 4 1111 2101

E: alan.eggers@ttrl.co.nz

W: www.ttrl.co.nz



11 February 2025

Charlotte Littlewood Chair, Taranaki Regional Council New Zealand

By email: charlotte.littelwood@trc.govt.nz

Dear Charlotte

TTR Taranaki VTM Project in South Taranaki Bight

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I'm delighted to share it with you as it finds there will be 303 new jobs created by the project in the Taranaki Region and Whanganui District, with an annual direct spend of \$221 million.

NZIER estimates the project will increase New Zealand's GDP by \$250 million and employment by 1300 jobs, with more than 80% of this impact benefiting the Taranaki and Whanganui economies – or delivering \$205 million in annual GDP and 1100 jobs locally.

Taxes and royalties will also be significant, with royalties ramping up once capital has been paid down.

The figures align with the previous economic impact assessment prepared by Martin Jenkins in 2015.

There are considerable other local, regional and national benefits outlined in the report. It would be great to meet and discuss these, and update you on the other activities we are undertaking in preparation for our Fast Track application.

Thanks for your time.

Yours sincerely

Trans-Tasman Resources Limited

Alan J Eggers

Executive Chairman



From: Charlotte Littlewood < Charlotte.Littlewood@trc.govt.nz>

Sent: Tuesday, 11 February 2025 8:01 pm **To:** Erica Guy <<u>erica@lillisclark.com</u>>

Subject: Re: TTR Update

Thank you

Charlotte

Charlotte Littlewood (she/her)

Chairperson

From: Erica Guy < erica@lillisclark.com>
Sent: Tuesday, February 11, 2025 3:43:36 PM

To: Charlotte Littlewood <Charlotte.Littlewood@trc.govt.nz>

Subject: TTR Update

You don't often get email from erica@lillisclark.com. Learn why this is important

Hi Charlotte,

I hope your week has started well.

Please find attached an update from Alan and an independent report assessing the economic impact of Trans-Tasman Resources' proposed project.

We are happy to answer any questions you may have.

Thanks for your time.

Cheers Erica

Erica Guy

CONSULTANT



021 894 123 | erica@lillisclark.com | lillisclark.com

40 Bowen Street, Wellington 6011



From: Charlotte Littlewood < Charlotte.Littlewood@trc.govt.nz>

Sent: Wednesday, 12 February 2025 3:01 pm

To: Erica Guy < erica@lillisclark.com >

Subject: Re: TTR Update

Kia ora Erica,
Thanks for the opportunity, but I've resigned as Chair of TRC, effective on Tuesday.
A new Chair will be elected then, so not really worth Alan meeting with me!
Ngā mihi, Charlotte
Charlotte Littlewood (she/her) Chairperson

From: Erica Guy < erica@lillisclark.com >

Sent: Wednesday, February 12, 2025 10:05:08 AM

To: Charlotte Littlewood < Charlotte.Littlewood@trc.govt.nz>

Subject: RE: TTR Update

You don't often get email from erica@lillisclark.com. Learn why this is important

Hi again Charlotte,

Alan is going to be in New Plymouth on Friday afternoon and, if you are available, he would welcome the opportunity to meet in person. It would provide an opportunity to discuss the project, answer any questions you have and also cover off any concerns.

Let me know.

Thank you

Cheers Erica

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TTR

10 February 2025

Andrew Tripe
Mayor Whanganui district Council
New Zealand

By email: Andrew.tripe@whanganui.govt.nz

Dear Andrew

TTR Taranaki VTM Project in South Taranaki Bight

I am writing to bring your attention to the latest information relating to the economic impact of our Taranaki VTM project to your district.

Please find attached the *Economic impact assessment of TTR's Taranaki VTM Iron Sands Project*, a report by the New Zealand Institute of Economic Research (NZIER) which we received on Friday (February 7).

I'm delighted to share it with you as it finds there will be 303 new jobs created by the project in the Taranaki Region and Whanganui District, with 77 of those being in the South Taranaki and Whanganui Districts.

It also found there will be an annual direct spend of \$221 million in New Zealand across a range of industries, and within that \$47 million will be spent in South Taranaki and Whanganui.

You had asked how the project will benefit Whanganui and this report clearly articulates there will be jobs and money spent in the district.

NZIER estimates the project will increase New Zealand's GDP by \$250 million and employment by 1300 jobs, with more than 80% of this impact benefiting the Taranaki and Whanganui economies – or delivering \$205 million in annual GDP and 1100 jobs locally.

Taxes and royalties will also be significant, with royalties ramping up once capital has been paid down.

The figures align with the previous economic impact assessment prepared by Martin Jenkins in 2015.

There are considerable other local, regional and national benefits outlined in the report. It would be great to meet and discuss these, and update you on the other activities we are undertaking in preparation for our Fast Track application.

Thank you for your time.

Yours sincerely

Trans-Tasman Resources Limited

Alan J Eggers

Executive Chairman



From: Andrew Tripe < Andrew.Tripe@whanganui.govt.nz >

Sent: Monday, 10 February 2025 4:36 pm **To:** Erica Guy <<u>erica@lillisclark.com</u>>

Subject: RE: TTR News

Thanks Erica.

Whanganui has often been bundled into South Taranaki and that is the issue. We understand most, if not all benefit (jobs and economic benefits) will be in South Taranaki so to separate the benefits out is required.

Regards, A.

From: Erica Guy < erica@lillisclark.com Sent: Monday, 10 February 2025 4:24 pm

To: Andrew Tripe < Andrew.Tripe@whanganui.govt.nz >

Subject: TTR News

Hi Andrew,

I hope you enjoyed a long Waitangi Weekend.

Please find attached a letter from Alan and also the New Zealand Institute for Economic Research report on the economic impact assessment for Trans-Tasman Resources project off the coast. It outlines economic benefits – the jobs and dollar spend – to Whanganui that you would be interested in.

Take care,

Cheers Erica



30 January 2025

Andrew Tripe
Mayor Whanganui district Council
New Zealand

By email: Andrew.tripe@whanganui.govt.nz

Dear Andrew

TTR Taranaki VTM Project in South Taranaki Bight

I hope you have enjoyed a good summer and holiday break.

I just wanted to update you that Trans-Tasman Resources is preparing its application for the Taranaki VTM (seabed mining) project under the new Fast Track process, following the Fast Track Act's passing pre-Christmas.

The applications open at the end of next week and we plan to lodge our application for consideration in March.

We are updating and reviewing much of our previous material as part of the application process and, as we have discussed with you, are focused on meeting all the environmental conditions previously agreed to ensure that any effects are appropriately managed and mitigated.

If approved, we are confident the project will provide significant benefits to the wider Taranaki and Whanganui regions.

I'm happy to answer any questions you have and will keep you updated with our progress.

Yours sincerely

Trans-Tasman Resources Limited

Alan J Eggers

Executive Chairman



From: Erica Guy

Sent: Wednesday, 13 November 2024 11:25 am

To: andrew.tripe@whanganui.govt.nz

Subject: Trans-Tasman Resources meeting

Hi Andrew,

Thank you for taking my call and good to chat.

My apologies that you haven't received any communication from TTR to date.

As discussed, TTR's executive chairman Alan Eggers is keen to engage with you and to outline the Taranaki VTM project to you and answer all the questions you have. He is currently in Perth and so it would be great if you are happy for the initial engagement to be online and when he returns to New Zealand we will plan to organise a face-to-face meeting with you.

Given the time zone difference, it would be ideal if the meeting could be anytime from midday onwards please? If you could provide a couple of dates/times then I will check with Alan and confirm.

Thanks again,

Cheers

Erica



Jacq Dwyer Chair Patea Community Board New Zealand

By email: jacq.dwyer@stdc.govt.nz

Dear Jacq

TTR Taranaki VTM Project in South Taranaki Bight

I hope you have enjoyed a good summer and holiday break.

I just wanted to update you that Trans-Tasman Resources is preparing its application for the Taranaki VTM (seabed mining) project under the new Fast Track process, following the Fast Track Act's passing pre-Christmas.

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If approved, we are confident the project will provide significant benefits to the wider Taranaki and Whanganui regions.

I'm happy to answer any questions you have and will keep you updated with our progress.

Yours sincerely

Trans-Tasman Resources Limited

Alan J Eggers

Executive Chairman



From: Jacq Dwyer < Jacq. Dwyer@STDC.govt.nz>

Sent: Friday, 31 January 2025 12:35 pm **To:** Erica Guy <erica@lillisclark.com>

Subject: RE: TTR Update

Thanks for the update Erica, hope you had a good festive break too. As you know I will never approve of seabed mining with the current technology available to extract minerals. Maybe in 20 years time when this process has been refined and the entire seabed doesn't have to be destroyed in the process, but at this stage, no.

Ngā mihi, Kind Regards



Kaitātari Tautoko Ratonga Kiritaki | Information Officer (isite)

Whare whakamōhio manuhiri o Taranaki ki te Tonga/ i-Wāhi o Taranaki ki te Tonga | South Taranaki isite Visitor Information Centre

121 High Street | Private Bag 902, Hāwera 4640, NZ Waea/Phone: +64 6 278 8599 | 0800 111 323 | <u>www.southtaranaki.com</u>





From: Jacq Dwyer <Jacq.Dwyer@STDC.govt.nz>
Sent: Tuesday, 19 November 2024 12:29 pm

To: Erica Guy <erica@lillisclark.com>

Subject: RE: Thank you

Hi Erica

Thank you for the meeting, always good to talk. I won't be changing my mind about Seabed mining. But yes, keep in touch, still lots to discuss.

Ngā mihi, Kind Regards



Kaitātari Tautoko Ratonga Kiritaki | Information Officer (isite)

Whare whakamōhio manuhiri o Taranaki ki te Tonga/ i-Wāhi o Taranaki ki te Tonga | South Taranaki isite Visitor Information Centre

55 High Street | Private Bag 902, Hāwera 4640, NZ

Waea/Phone: +64 6 278 8599 | 0800 111 323 | www.southtaranaki.com



From: Erica Guy <<u>erica@lillisclark.com</u>>
Sent: Tuesday, 19 November 2024 10:01 am
To: Jacq Dwyer <<u>Jacq.Dwyer@STDC.govt.nz</u>>

Subject: Thank you

Hi Jacq,

Thank you again for your time yesterday afternoon to hear about Trans-Tasman Resources project to mine the iron sands off the coast of Taranaki and to also ask questions of Alan.

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It was good to have an open chat and we appreciated the opportunity to try and address your concerns.

We will continue to stay in touch and are happy to send any information you think would be helpful in supporting greater understanding of the project, its impacts and its benefits.

Certainly, we would welcome the opportunity to meet in person when Alan is next in the community.

Thanks again

Kind regards,

Erica



David Macleod MP New Plymouth New Zealand

By email: david.macleod@parliament.govt.nz

Dear David

TTR Taranaki VTM Project in South Taranaki Bight

I hope you have enjoyed a good summer and holiday break.

I just wanted to update you that Trans-Tasman Resources is preparing its application for the Taranaki VTM (seabed mining) project under the new Fast Track process, following the Fast Track Act's passing pre-Christmas.

The applications open at the end of next week and we plan to lodge our application for consideration in March.

We are updating and reviewing much of our previous material as part of the application process and, as we have discussed with you, are focused on meeting all the environmental conditions previously agreed to ensure that any effects are appropriately managed and mitigated.

If approved, we are confident the project will provide significant benefits to the wider Taranaki region.

I'm happy to answer any questions you have and will keep you updated with our progress.

Yours sincerely

Trans-Tasman Resources Limited

Alan J Eggers

Executive Chairman



From: Alan Eggers <Alan.Eggers@ttrl.co.nz> Sent: Tuesday, 5 November 2024 2:09 pm

To: David MacLeod <david.macleod@parliament.govt.nz>

Cc: Erica Guy <erica@lillisclark.com>

Subject: TTR Meeting

Hi David

TTR Meeting and Consultation

Thank you for taking the time to catch up in you New Plymouth office last week.

Also, thanks for inviting in your assistant, Jenna, into the meeting so she could gain a good understanding of the project.

It is really important that people understand the facts surrounding the project, and in particular how it will meet its environmental obligations as well as deliver huge benefits to New Plymouth, the wider Taranaki region and New Zealand.

As you know, the project continues to generate a lot of interest along with political and media attention.

The project offers massive opportunities for your region with wide-ranging impacts and benefits.

While in the region I also took the opportunity to catch up with Ross Dingle Taranaki Port, Matthew Ries Wood Training, Mark Hooper Federated Farmers Taranaki, Neil Holdom New Plymouth and Phil Nixon STDC.

We are now focused on preparing our application to progress under the Fast Track legislation once it is passed through Parliament, which we expect to happen prior to Christmas.

I will keep you updated on our activities and also welcome any questions you may have at any time. It's important you have the most accurate and reliable information.

Also, I'm always available to provide information and or meet with others that may from time to time provide feed back to you on our activities and proposed operation in the South Taranaki Bight.

Thanks again.

Cheers

Alan E



Alan J Eggers
Executive Chairman
TTR GLOBAL LIMITED

M: +61 4 1111 2101

E: alan.eggers@ttrl.co.nz

W: www.ttrl.co.nz

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From: Alan Eggers <Alan.Eggers@ttrl.co.nz> **Sent:** Wednesday, 23 October 2024 2:18 pm

To: David MacLeod <david.macleod@parliament.govt.nz> **Cc:** Erica Guy <erica@lillisclark.com>; John <john@jura.nz>

Subject: TTR Briefing Papers

Hi David

TTR Briefing Papers Taranaki VTM Project

OWE Letter of Offer to Engage

Thanks for the call and discussion on TTR's proposed iron sands project in the South Taranaki Bight.

As we discussed, please find attached TTR briefing Papers on our project and commentary on the Offshore Wind Energy (OWE) proposals and their Ministerial briefing paper in May 2024.

I have also attached TTR's letter to Blue Float, one of the seven OWE proponents, offering to work together and engage to our mutual benefits in the STB. This letter of offer was also sent to Sumitomo, Park Wind, Taranaki Offshore Partnership, Ocean, Energy Estate and Wind Quarry.

I will also pencil in 1pm to 3pm on Tuesday 29 October to meet in New Plymouth and confirm with you in the next couple of days.

Cheers

Alan E



Barbara Kuriger MP Taranaki-King Country New Zealand

By email: Barbara.kuriger@parliament.govt.nz

Dear Barbara

TTR Taranaki VTM Project in South Taranaki Bight

I hope you have enjoyed a good summer and holiday break.

I just wanted to update you that Trans-Tasman Resources is preparing its application for the Taranaki VTM (seabed mining) project under the new Fast Track process, following the Fast Track Act's passing pre-Christmas.

The applications open at the end of next week and we plan to lodge our application for consideration in March.

We are updating and reviewing much of our previous material as part of the application process and, as we have discussed with you, are focused on meeting all the environmental conditions previously agreed to ensure that any effects are appropriately managed and mitigated.

If approved, we are confident the project will provide significant benefits to the wider Taranaki region.

I'm happy to answer any questions you have and will keep you updated with our progress.

Yours sincerely

Trans-Tasman Resources Limited

Alan J Eggers

Executive Chairman



From: Barbara Kuriger < Barbara.Kuriger@parliament.govt.nz >

Sent: Thursday, 30 January 2025 2:25 pm **To:** Erica Guy <<u>erica@lillisclark.com</u>>

Subject: RE: TTR Update

Hi Erica,

Yes we had a good break – first family and then hiking. I hope you and your family are well.

Thank you for the update on TTR. I appreciated being kept in the loop.

Regards,

Barbara Kuriger MP

Member of Parliament for Taranaki-King Country | Deputy Speaker of the House of Representatives

DDI: + 64 4 817 9281 | E: Lyndsey.Cook@parliament.govt.nz | W: https://barbarakuriger.national.org.nz

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Carl Bates MP Whanganui New Zealand

By email: carl.bates@parliament.govt.nz

Dear Carl

TTR Taranaki VTM Project in South Taranaki Bight

I hope you have enjoyed a good summer and holiday break.

I just wanted to update you that Trans-Tasman Resources is preparing its application for the Taranaki VTM (seabed mining) project under the new Fast Track process, following the Fast Track Act's passing pre-Christmas.

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If approved, we are confident the project will provide significant benefits to the wider Taranaki and Whanganui regions.

I'm happy to answer any questions you have and will keep you updated with our progress.

Yours sincerely

Trans-Tasman Resources Limited

Alan J Eggers

Executive Chairman



From: Carl Bates < Carl.Bates@parliament.govt.nz >

Sent: Thursday, 30 January 2025 2:26 pm **To:** Erica Guy <<u>erica@lillisclark.com</u>>

Subject: Re: TTR Update

Thanks very much for the update Erica.





Sent: Tuesday, 28 January 2025 4:28 pm

To: Carl Bates < Carl. Bates @parliament.govt.nz>

Subject: RE: Question on TTR royalties

Hi Carl,

Great to hear from you. I hope you had a great break and are all set to go for a big year in 2025.

The straight forward answer to your question is yes.

If TTR extracts vanadium, as planned, and get credits from a buyer in an off-take agreement for the vanadium the NZ government will get meaningful royalties for the metal recovered and paid for over and above the iron ore royalties.

The metallurgical report quantifying this for the FTA application is in advanced preparation.

Hope that helps.

Cheers Erica

From: Carl Bates < Carl.Bates@parliament.govt.nz >

Sent: Tuesday, 28 January 2025 3:44 pm
To: Erica Guy < erica@lillisclark.com >
Subject: Question on TTR royalties

Happy New Year Erica, all the best for 2025!

I just have one clarifying question regarding the above. If TTR are able to export and extract vanadium from some of the iron sand, would this improve the royalties paid to the New Zealand Government (and if so how)?

Thanks very much

Carl



From: Carl Bates < Carl. Bates @parliament.govt.nz >

Sent: Thursday, 14 November 2024 5:49 pm

To: Erica Guy <erica@lillisclark.com>

Subject: Re: Follow-up

Hi Erica

Thanks very much for the follow up. Nothing further at this stage, but keen to stay in touch.

Really appreciate you organising the session Carl



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Sent: Monday, 11 November 2024 4:55 pm

To: carl.bates@parliament.govt.nz

Subject: Trans-Tasman Resources follow-up

Hi Carl,

Thank you for taking the time to meet with Alan Eggers from Trans-Tasman Resources online recently and to also share what you have heard about the project, as well as offering to host a roundtable of key people if and when Alan is able to visit Whanganui. That is much appreciated.

You asked a range of questions and also for some information about the journey to date and also a summary of the court rulings. Please find these attached.

As you know the project will be listed in the schedule of projects when the Fast Track Bill is introduced to Parliament between now and Christmas. Again, as Alan mentioned we are well aware this does not mean that the project is approved at all and Trans-Tasman Resources also does not see this process as a way to minimise the project's obligations to the environment at all.

As Alan mentioned, Trans-Tasman Resources wrote to the offshore wind energy consortiums in early September and offered to meet to discuss how they could work together in the region – through cooperation and communication – to enable both offshore wind energy and seabed mining to co-exist in the South Taranaki Bight. The letter also highlighted there are many synergies that could be obtained from working together, such as marine monitoring. This offer was declined.

Thanks again and please come back to us with any further questions you have.

Kind regards

Erica



Suze Redmayne MP Rangitikei New Zealand

By email: suze.redmayne@parliament.govt.nz

Dear Suze

TTR Taranaki VTM Project in South Taranaki Bight

I hope you have enjoyed a good summer and holiday break.

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If approved, we are confident the project will provide significant benefits to the wider Taranaki and Whanganui regions.

I'm happy to answer any questions you have and will keep you updated with our progress.

Yours sincerely

Trans-Tasman Resources Limited

Alan J Eggers

Executive Chairman



From: Connor McErlich < Connor. McErlich@parliament.govt.nz > On Behalf Of Suze Redmayne

Sent: Wednesday, 19 February 2025 10:47 am

To: Erica Guy <erica@lillisclark.com>

Subject: RE: TTR Update

Hi Erica

Thank you for the update, and for the comprehensive zoom briefing.

Wishing TTR well in their efforts – and please keep in touch regarding any future updates.

Kind regards

Suze







Matthew Ries Wood Training New Zealand

By email: matthew.ries@woodplc.com

Dear Matthew

TTR Taranaki VTM Project in South Taranaki Bight

I hope you have enjoyed a good summer and holiday break.

I just wanted to update you that Trans-Tasman Resources is preparing its application for the Taranaki VTM (seabed mining) project under the new Fast Track process, following the Fast Track Act's passing pre-Christmas.

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I'm happy to answer any questions you have and will keep you updated with our progress.

Yours sincerely

Trans-Tasman Resources Limited

Alan J Eggers

Executive Chairman



Ross Dingle Port Taranaki New Zealand

By email: rdingle@porttaranaki.co.nz

Dear Ross

TTR Taranaki VTM Project in South Taranaki Bight

I hope you have enjoyed a good summer and holiday break.

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I'm happy to answer any questions you have and will keep you updated with our progress.

Yours sincerely

Trans-Tasman Resources Limited

Alan J Eggers

Executive Chairman



From: Ross Dingle <rdingle@porttaranaki.co.nz>

Sent: Thursday, 30 January 2025 1:47 pm **To:** Erica Guy <erica@lillisclark.com>

Subject: Re: TTR Update

+64 27 310 5112

rdingle@porttaranaki.co.nz

Thanks Erica
Really appreciate the update.
Kind regards
Ross
Ross Dingle
GM Commercial
Port Taranaki Limited

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Arun Chaudhari Taranaki Chamber of Commerce New Zealand

By email: ceo@taranakichamber.co.nz

Dear Arun

TTR Taranaki VTM Project in South Taranaki Bight

I hope you have enjoyed a good summer and holiday break.

I just wanted to update you that Trans-Tasman Resources is preparing its application for the Taranaki VTM (seabed mining) project under the new Fast Track process, following the Fast Track Act's passing pre-Christmas.

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I'm happy to answer any questions you have and will keep you updated with our progress.

Yours sincerely

Trans-Tasman Resources Limited

Alan J Eggers

Executive Chairman



From: Arun Chaudhari < ceo@taranakichamber.co.nz >

Sent: Friday, 31 January 2025 8:40 am **To:** Erica Guy <<u>erica@lillisclark.com</u>>

Subject: Re: TTR Update

Hi Erica

Thanks for keeping us posted.

Much appreciated

Best regards

Arun

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From: Arun Chaudhari <ceo@taranakichamber.co.nz>

Sent: Friday, 30 August 2024 12:14 am **To:** 'Alan Eggers' <Alan.Eggers@ttrl.co.nz>

Cc: Erica Guy <erica@lillisclark.com>; John <john@jura.nz>; Maura Young <maura@taranakichamber.co.nz>;

Rebecca Mende < rebecca@taranakichamber.co.nz>

Subject: RE: TTR Taranaki Chamber of Commerce Membership

Hi Alan

Thanks for your call this evening.

I sincerely hope that the intent conveyed in your email is something that can be accomplished for the STB.

It's good to know that you have operating agreements and arrangements with various companies and interest groups.

We welcome you to be part of the Chamber and to engage with Iwi and other stakeholders in the TTR project.

You can sign up as a member of our Chamber here

I suggest signing up for the Business and Retail Association (BARA) option as well, as it would increase your stakeholder connection.

I have copied in our Membership team.

Once TTR is a paid Chamber member, I'd be happy to learn more about your stakeholder engagement strategy from now onwards.

I am aware that pre COVID you had met several interest groups. People and sentiments may have changed since,

We look forward to your membership and to some workable solutions.

Ngā mihi nui

Arun Chaudhari

CEO

Taranaki Chamber of Commerce

Chamber House 42 Egmont Street – P O Box 2 – New Plymouth 4310

Ph +64 6 759 9080 **Mob** + 64 27 279 5161

Email ceo@taranakichamber.co.nz



From: Alan Eggers <Alan.Eggers@ttrl.co.nz> Sent: Thursday, 29 August 2024 6:54 pm

To: Arun Chaudhari <ceo@taranakichamber.co.nz>

Cc: Erica Guy <erica@lillisclark.com>; John <john@jura.nz> **Subject:** TTR Taranaki Chamber of Commerce Membership

Hi Arun

Thanks for taking the call today.

I'm happy to further our conversation tomorrow on TTR's plans offshore Taranaki and how these will benefit the region and how we can work with all business in Taranaki including those operating, or proposing to operate, in the South Taranaki Bight.

We already have operating agreements for co-operation and practical working arrangements with Oil & Gas (Beach OMV) and Fishing (Sanfords) in the area and would propose we have similar arrangements with Offshore Wind Energy (OWE) should they develop their plans to establish infrastructure in the area.

There are a large number synergies, both offshore and land based, for us to be working together and would welcome the opportunity to explore these with OWE and any other interests and businesses in Taranaki.

The question is not "is it mineral recovery or wind energy in STB?", but is "how do we co-operate so we can not only co-exist but generate improved business outcomes for both industries?".

We are of the view all commercial interests in the STB can have a mutually beneficial arrangement that will be huge positive to Taranaki rather than less diversification and reliance on 'one or the other' approach.

In the meantime, can you please send an application to apply for membership to the Taranaki Chamber of Commerce for our consideration?

I look forward to catching up and keeping you informed of our plans and engagement with the wider Taranaki community.

Cheers

Alan E



M: +61 4 1111 2101



Mr Kelvin Wright Venture Taranaki New Zealand

By email: kelvin@venture.org.nz

Dear Kelvin

TTR Taranaki VTM Project in South Taranaki Bight

I hope you have enjoyed a good summer and holiday break.

I just wanted to update you that Trans-Tasman Resources is preparing its application for the Taranaki VTM (seabed mining) project under the new Fast Track process, following the Fast Track Act's passing pre-Christmas.

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We are updating and reviewing much of our previous material as part of the application process and, as we have discussed with you, are focused on meeting all the environmental conditions previously agreed to ensure that any effects are appropriately managed and mitigated.

If approved, we are confident the project will provide significant benefits to the wider Taranaki region.

I'm happy to answer any questions you have and will keep you updated with our progress.

Yours sincerely

Trans-Tasman Resources Limited

Alan J Eggers

Executive Chairman



Sent: Tuesday, 4 February 2025 9:19 am **To:** Kelvin Wright < Kelvin@venture.org.nz > **Subject:** Draft economic impact report

Hi Kelvin,

I hope you are well. I have some interesting information for you that we have just received – the *draft* NZIER Economic Impact Assessment (EIA) for the TTR Taranaki VTM Project.

The key findings are that for each year of the project's operation, it estimates:

- An annual GDP contribution of \$246 million and about 1,320 jobs to the total New Zealand economy
- Within that national impact, an annual GDP contribution of \$205 million and about 1,093 jobs to the regional economy of Taranaki Region and Whanganui
- Within that regional impact, an annual GDP contribution of \$40 million and about 249 jobs to the local economy of the South Taranaki and Whanganui districts.

As well NZIER estimate the project could contribute annual iron ore export earnings of \$763 million and between \$36 million to \$53 million of royalties and \$91 million to \$134 million corporate tax per year to the New Zealand Government.

These figures are all in line with TTR's estimates with jobs substantially up to nearly 1,100 in Taranaki with a \$205 million boost to the Taranaki GDP. The lower end royalties and corporate tax figures are in the start-up phase whilst TTR pays back debt (approx 18 months).

You may know the size of the Taranaki Region, South Taranaki and Whanganui districts current GDPs to assess the impacts, but we would assume they are large!

As I mentioned the report is in draft, and Alan tells me some edits are required, but not to these figures. It should be finalised by the end of the week.

Cheers Erica



From: Alan Eggers <Alan.Eggers@ttrl.co.nz> Sent: Friday, 20 September 2024 12:46 pm

To: Kelvin Wright <kelvin@venture.org.nz>; Anne Probert <anne@venture.org.nz>

Cc: Nina Stairmand < Nina. Stairmand@venture.org.nz>; Erica Guy < erica@lillisclark.com>

Subject: TTR Meeting with Mayors Info Memo

Hi Kelvin and Anne

TTR Meeting with Mayors Info Memo

Please find attached a Information Memo as background for the meeting with the Mayors on Monday.

We thought if this was distributed prior to the meeting it would provide some valuable background information and a basis for our discussions.

I will be happy to briefly introduce the project, and summarise the information so we can spend time on addressing their concerns and information gaps on the proposed operation and its impacts.

Cheers

Alan E





Sent: Tuesday, 24 September 2024 9:26 am **To:** Kelvin Wright < Kelvin@venture.org.nz > **Cc:** Alan Eggers < Alan.Eggers@ttrl.co.nz >

Subject: Follow-up from yesterday

Morning Kelvin,

Thanks for your organisation of the meeting yesterday and helping make it happen. As you say, the Mayors gave TTR a good hearing and came away with a greater understanding of the project and opportunities for Taranaki in terms of jobs and economy, and the opportunity that the region can have both seabed mining and OWE – there does not need to be a choice.

During the meeting Alan raised results from a poll of Taranaki people showing widespread support for the project, which generated a couple of questions from the Mayors. They had asked to see the survey results, which we acknowledge are now quite dated, so wonder if you could please forward? I have attached it again FYI.

I have also attached the full set of EPA Approved Conditions for TTR's marine and discharge consents. The key conditions relating to community and iwi are covered in conditions 61 to 65 and 72 to 86. It is useful to have these conditions in context with the entire set of conditions and the operations and monitoring plans. We could discuss how these may be best presented or shared with the iwi group, alongside other information on the project?

Thanks again

Cheers Erica

Erica GuyCONSULTANT



021 894 123 | erica@lillisclark.com | lillisclark.com

40 Bowen Street, Wellington 6011



Sent: Monday, 2 September 2024 3:47 pmTo: Kelvin Wright <kelvin@venture.org.nz>Cc: Anne Probert <Anne@venture.org.nz>Subject: FW: Serving NZ's best interests

Hi Kelvin and Anne,

Please find attached a letter sent to Nathan Turner today – similar letters have been sent to all Offshore Wind Energy interests this afternoon.

Thank you for your assistance and we'll keep in touch in regards to formalising a meeting.

Cheers Erica



Sent: Thursday, 17 October 2024 4:50 pmTo: Kelvin Wright < Kelvin@venture.org.nz>Cc: Alan Eggers < Alan.Eggers@ttrl.co.nz>Subject: Note for Iwi leaders meeting

Hi Kelvin,

Good to catch up briefly today and I hope the gas conference is going well.

As discussed, please find attached a meeting outline that we would appreciate you please sharing with the lwi leaders group so we can engage with them.

Alan and I will be in New Plymouth and available to meet anytime on October 29 and in the morning of October 30.

Thanks for your help.

Cheers Erica



TTR's Taranaki VTM Project Iwi Leaders Meeting Request – 29/30 October 2024

Tēnā koe,

Introduction:

Trans-Tasman Resources has been seeking approval to mine the iron sands in the South Taranaki Bight for iron ore, vanadium and titanium for more than 10 years. These are critical minerals in high demand as economies transition to renewable energy.

The project presents an opportunity to deliver significant long term export earnings for New Zealand and benefits to the Taranaki region. These benefits include hundreds of local jobs, a \$250 million annual operational spend, much-needed infrastructure investment, the establishment of a logistics hub and training centre in Hawera, as well as a head office in New Plymouth.

Purpose:

Trans-Tasman Resources Executive Chairman Alan Eggers would like to meet with local iwi leaders to outline the project, address misinformation, outline the engagement it has completed, and outline the efforts it has taken to address concerns – as well as answer any questions kanohi ki te kanohi.

The Taranaki VTM project has been included in the Government's Fast Track legislation set to be approved by the end of the year, and is likely to go before an expert panel overseen by the Environmental Protection Authority (EPA) in 2025.

It is important iwi leaders understand the facts, hear from Mr Eggers and have the opportunity to have any questions and concerns addressed.

Nāku noa, nā



From: Andrew Talley <Andrew@talleys.co.nz>
Sent: Friday, 13 December 2024 10:08 am
To: Alan Eggers <Alan.Eggers@ttrl.co.nz>

Cc: Erica Guy <erica@lillisclark.com>; John <john@jura.nz>; Doug Loder <doug.loder@talleys.co.nz>

Subject: RE: TTR Taranaki VTM Project in South Taranaki Bight

Hi Alan - thanks for your letter

Its correct we have significant concerns about the proposal however the best contact remains Doug Loder.

I know you've met Doug previously (copied). He and his team would be the best contact to meet with in the New year.

а

From: Alan Eggers < Alan. Eggers @ttrl.co.nz > Sent: Thursday, December 12, 2024 5:08 PM
To: Andrew Talley < Andrew @talleys.co.nz >

Cc: Erica Guy < erica@lillisclark.com>; John < john@jura.nz> Subject: TTR Taranaki VTM Project in South Taranaki Bight

You don't often get email from alan.eggers@ttrl.co.nz. Learn why this is important

Hi Andrew

TTR Taranaki VTM Project in South Taranaki Bight

Please find attached a letter suggesting we meet to discuss our Taranaki VTM Project in the STB and Talleys concerns with the proposal.

I look forward to hearing from you and your favourable consideration to meeting in the New Year.

Best Regards

Alan J Eggers





12 December 2024

Mr Andrew Talley Talley's Group Ltd Port Motueka 7120 New Zealand

By email: andrew.talley@talleys.co.nz

Dear Andrew

TTR Taranaki VTM Project in South Taranaki Bight

As you will be aware the Fast-track Approvals Bill is currently going through Parliament and is due to be passed into law before Christmas.

Trans-Tasman Resources' project to mine the iron sands off the coast of Taranaki is one of 149 projects listed in the Bill to be fast-tracked. This means we are likely to go before an Environmental Protection Authority (EPA) Expert Panel next year and the Panel will determine if our project should proceed.

We recognise that, while our project has support, some opposition also remains.

In the past few months we have re-engaged with a range of people and organisations in the Taranaki and Whanganui community to provide information, increase understanding of the project, and to help us understand their concerns and how we can best address and mitigate these.

To be frank, some groups are not interested in engaging with us and others have chosen not to accept our expert scientific reports on the project's benefits and impacts. That is disappointing, but it is their right.

We are writing to you as Talley's has opposed our previous applications.

We understand that Talley's are concerned about the potential for adverse effects our activities may potentially have on your existing commercial fisheries interests in the South Taranaki Bight.

We are interested in engaging with you to better understand the basis for your position, to answer questions you may have and to share more detail on the project. We can demonstrate that our proposed project to recover VTM concentrate in the South Taranaki Bight will not have any adverse effects on, or interfere with, your existing commercial rights.

We have spent time specifically addressing the concerns of the commercial fisheries and aquaculture in the area and, after consultation, gained the support of, and reached an operating agreement with, Sanford Ltd for TTR to operate in the South Taranaki Bight.

It is important to us that we take the time and opportunity to improve our mutual understanding with Talley's. We may not agree on everything, but we may also be able to find some common ground to build from.

Trans-Tasman Resources Limited PO Box 10 571, Wellington 6143 NEW ZEALAND

Website: www.manukaresources.com.au





Nathan Turner Blue Float

By email: nturner@bluefloat.com
cc: jgilliland@bluefloat.com

TTR Taranaki VTM Project and Offshore Wind Energy Proposals in South Taranaki Bight

Dear Nathan,

We are writing as we think the best interests of New Zealand and the Taranaki region will be served by us working together to deliver both offshore wind energy and seabed mining in the South Taranaki Bight.

We strongly believe both activities can co-exist in the region with co-operation. We already have agreements to work with fishing and oil & gas interests in the region.

Seabed mining has the potential to deliver significant economic benefits to New Zealand. We anticipate our Taranaki VTM project will generate \$1 billion annually in export earnings, more than \$200 million to the government in royalties and taxes and over 1,650 high value jobs nationwide.

Locally, Trans-Tasman Resources will establish a training institute and logistics hub in Hawera and a head office in New Plymouth, create 300 Taranaki-based jobs and an additional 170 jobs in the wider Taranaki region (logistics, services supplies). It will spend \$250 million each year on its operations and staff, helping to lift Taranaki's GDP by over 5%.

We acknowledge the need for New Zealand to also invest in renewable energy to decarbonise our economy and ensure a reliable and sustainable energy supply. We understand there are a number of locations around the country that offer opportunities for offshore wind electricity generation.

You will know that minerals are needed in the transition to a low carbon future. They are needed to build wind turbines, develop power transmission infrastructure and in battery storage. New Zealand can import these minerals or we can benefit from the resources we have.

We think there is an opportunity for us to work together and deliver a win-win outcome for New Zealand and Taranaki.

There are also considerable synergies that could be gained. These may include the use of our extensive drill hole, geotechnical and geological information on the seabed, and our detailed and extensive independent marine research data base, including marine mammal whale and dolphin surveys, of the area.

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Website: www.manukaresources.com.au



From: Nathan Turner < nturner@bluefloat.com>
Date: Friday, 27 September 2024 at 4:34 PM

To: Charlotte Campbell < charlotte@lillisclark.com > **Cc:** Justine Gilliland < jgilliland@bluefloat.com >

Subject: RE: Serving NZ's best interests

Kia ora Charlotte

Thank you for your letter dated 2 September 2024.

We note that a number of important milestones are due to occur in the coming months including the finalisation of the Fast-track Approvals Bill and the enabling regulations for offshore wind. At this stage, our preference would be to understand the outcomes and implications of those milestones before determining next steps.

Best regards

Nathan

From: Charlotte Campbell <<u>charlotte@lillisclark.com</u>>

Sent: Monday, 2 September 2024 3:42 pm
To: Nathan Turner < nturner@bluefloat.com >
Cc: Justine Gilliland < jgilliland@bluefloat.com >

Subject: Serving NZ's best interests

Please see attached.





Simon Currie Energy Estate

By email: simon.currie@energyestate.com

TTR Taranaki VTM Project and Offshore Wind Energy Proposals in South Taranaki Bight

Dear Simon,

We are writing as we think the best interests of New Zealand and the Taranaki region will be served by us working together to deliver both offshore wind energy and seabed mining in the South Taranaki Bight.

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Website: www.manukaresources.com.au





Andy Evans Oceanex

By email: aevans@oceanexenergy.com

TTR Taranaki VTM Project and Offshore Wind Energy Proposals in South Taranaki Bight

Dear Andy,

We are writing as we think the best interests of New Zealand and the Taranaki region will be served by us working together to deliver both offshore wind energy and seabed mining in the South Taranaki Bight.

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Website: www.manukaresources.com.au





Peter Spencer Park Wind

By email: peter.spencer@parkwind.eu

cc: tania.roach@parkwind.eu

TTR Taranaki VTM Project and Offshore Wind Energy Proposals in South Taranaki Bight

Dear Peter,

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Trans-Tasman Resources Limited PO Box 10 571, Wellington 6143 NEW ZEALAND

Website: www.manukaresources.com.au



From: Peter Spencer < peter.spencer@parkwind.eu >

Date: Friday, 27 September 2024 at 12:35 PM

To: Charlotte Campbell < charlotte@lillisclark.com>

Cc: Tania Roach < tania.roach@parkwind.eu >, Mathias Van Steenwinkel

<mathias.vansteenwinkel@parkwind.eu>
Subject: RE: Serving NZ's best interests

Good afternoon Charlotte,

Thank you for your letter dated 2 September 2024.

A number of important milestones are set to occur in the coming months, such as finalisation of the Fast-track Approvals Bill and introduction of the Bill for offshore renewables to parliament.

As such our preference at present would be to understand the outcomes and implications of these before determining next steps.

Best regards

Ngā mihi,

Peter



ERA GROUP T +32 (0)16 240 790 | M (NZ) +64 2 160 8363 | M (BE) +32 479722535

www.parkwind.eu





Visit us!

Hall: B3.GF Stand: 221



This email and its attachments are confidential and may also be privileged. If you receive this email in error, please accept our apology, and delete it.

From: Charlotte Campbell < charlotte@lillisclark.com>

Sent: Monday, September 2, 2024 3:46 PM

To: Peter Spencer < <u>peter.spencer@parkwind.eu</u>> **Cc:** Tania Roach < <u>tania.roach@parkwind.eu</u>>

Subject: Serving NZ's best interests

Some people who received this message don't often get email from charlotte@lillisclark.com. Learn why this is important

Please see attached.





Hinata Kadowaki Sumitomo

By email: hinata.kadowaki@sumitomocorp.com

cc: Kosuke.shiraji@sumtomocorp.com; meguru.nishiyama@sumitomocorp.com

TTR Taranaki VTM Project and Offshore Wind Energy Proposals in South Taranaki Bight

Dear Hinata.

We are writing as we think the best interests of New Zealand and the Taranaki region will be served by us working together to deliver both offshore wind energy and seabed mining in the South Taranaki Bight.

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Website: www.manukaresources.com.au



From: kosuke.shiraji@sumitomocorp.com <kosuke.shiraji@sumitomocorp.com>

Date: Friday, 27 September 2024 at 4:22 PM

To: Charlotte Campbell < charlotte@lillisclark.com>

Cc: takashi.aota@sumitomocorp.com <takashi.aota@sumitomocorp.com>, meguru.nishiyama@sumitomocorp.com>, takumi.miyakoshi@sumitomocorp.com<takumi.miyakoshi@sumitomocorp.com>

Subject: RE: Serving NZ's best interests

Kia ora Charlotte Campbell,

Please allow me to reply to you on behalf of Hinata Kadowaki, because he was transferred to another business unit.

Thank you for your letter dated on 2nd Sep 2024.

We would like to note that a number of important milestones are due to occur in the coming months including the finalisation of the Fast-track Approvals Bill and the enabling regulations for offshore wind. Therefore, at this stage, our preference would be to understand the outcomes and implications of those milestones before determining next steps.

Your understanding and acceptance would be appreciated.

Thanks & Best Regards,

Kosuke Shiraji (Mr.)

Assistant Manager of Overseas Energy Solution Unit No.2

Overseas Energy Solution SBU

Sumitomo Corporation

2-3-2, Otemachi, Chiyoda Ku, Tokyo To, 100-8601, Japan

Mobile: +81-70-3625-6591

From: Charlotte Campbell <charlotte@lillisclark.com>

Sent: Monday, September 2, 2024 12:59 PM

To: Kadowaki Hinata [Offshore Wind IPP Business Unit(Japan)] < hinata.kadowaki@sumitomocorp.com>

Cc: Shiraji Kosuke [Overseas Energy Solution Unit No.2(Americas, Europe and Oceania)]

67



< kosuke.shiraji@sumitomocorp.com; Nishiyama Meguru [Overseas Energy Solution Unit No.2(Americas,

Europe and Oceania)] < meguru.nishiyama@sumitomocorp.com >

Subject: Serving NZ's best interests

Please see attached.





Giacomo Caleffi
Taranaki Offshore Partnership
By email: gca@cop.dk

TTR Taranaki VTM Project and Offshore Wind Energy Proposals in South Taranaki Bight

Dear Giacomo,

We are writing as we think the best interests of New Zealand and the Taranaki region will be served by us working together to deliver both offshore wind energy and seabed mining in the South Taranaki Bight.

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Trans-Tasman Resources Limited PO Box 10 571, Wellington 6143 NEW ZEALAND

Website: www.manukaresources.com.au









Charlotte Campbell Lillis Clark 40 Bowen Street Wellington 6011

27 September 2024

Dear Charlotte,

Thank you for the letter dated 2 September 2024.

We note that a number of important milestones are due to occur in the coming months including the finalisation of the Fast-track Approvals Bill and the enabling regulations for offshore wind. At this stage, our preference is to understand the outcomes and implications of those milestones before determining next steps.

Best regards

Yours sincerely,

Giacomo Caleffi

6 Conff

Business Development Director, Taranaki Offshore Partnership





Pat Omeara Wind Quarry

By email: pat.omeara@windquarry.com

TTR Taranaki VTM Project and Offshore Wind Energy Proposals in South Taranaki Bight

Dear Pat,

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