

Applicant Responses to Relevant Comments from Relevant Crown Ministers and Government Officials on the Taranaki VTM Project

This document contains the key comments from the following parties:

- > Minister for Economic Growth;
- > Minister for Infrastructure;
- > Minister for Biosecurity;
- > Minister for Oceans and Fisheries;
- > Minister for Resources and Regional Development;
- > Minister for Māori Development and Māori Crown Relations; and
- > Associate Minister of Transport

Comments from the Minister for Economic Growth

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
1	Identifies the project will generate significant economic regional and national benefits, and that the project aligns with government Minerals Strategy.	Economic	N/A	The Minister’s identification of the positive national and regional benefits is acknowledged.

Comments from the Minister for Infrastructure

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
1	The Minister identifies his broad support for Projects that deliver positive outcomes for New Zealand, including the Taranaki VTM Project.	Planning	N/A	The support of the Minister for the project and its positive outcomes for New Zealand are acknowledged.

Comments from the Minister for Biosecurity

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
1	The Project does not present any immediate biosecurity issues however all operations and vessels should comply with the relevant New Zealand regulation’s relating to biosecurity management.	Planning	Substantive FTA Application: Section 5.13.4 Attachment 1: Proposed Marine Consent Conditions 42-46 and 70	No additional conditions are necessary to address these comments, given the coverage provided by the proposed conditions below: > Condition 42: Requires ballast water management to meet Ministry for Primary Industry (“MPI”) requirements. > Condition 43: Requires hull cleaning to meet MPI requirements. > Condition 44: Provide biofouling records to Aquaculture NZ annually and to the EPA on request. > Condition 45: Prohibits operational or maintenance activities in Admiralty Bay. > Condition 46: Requires notification of Ngāti Koata no less than five working days before arrival in Admiralty Bay, enables marine mammal monitoring and consideration of anchorage location. > Condition 70: States detailed biosecurity management plan requirements.

Comments from Minister for Oceans and Fisheries

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
1	The impacts on commercial fishers may be underrepresented in the application, and pre-commencement engagement with commercial fishers will be important to establish ongoing monitoring, management and relationships.	Planning	Substantive FTA Application: Section 5.13.2 Attachment 1: Proposed Marine Consent Conditions: Condition 86 Supplementary Technical Package: 10, 10a,10b,10c, 17, 18, 25 Response Evidence: Evidence of Dr Alison MacDiarmid (Marine Ecology) (2025)	The effects of the project on commercial fishing are assessed extensively in the NIWA technical reports in the Supplementary Technical Package and in Section 5.13.2 of the FTA Application. The NIWA technical reports conclude that the project is unlikely to have negative impacts on commercial fishing. Suspended sediment levels may result in short-term displacement of species but is unlikely to result in material harm on species abundance. The project is unlikely to affect the abundance of commercially fished species in the area and unlikely to have any effect on near shore populations of fish and shellfish species. Further, as laid out in the 2025 evidence response of A MacDiarmid, the overall number of fishing events in the project area is very low and will result in a very low scale of potential displacement as a result of any exclusion zones around project vessels. As such, regardless of any perceived undervaluation, the value of the fishery will not be affected as the project is unlikely to have negative effects on commercial fishing. Additionally, Condition 86 will provide communication with commercial fishers as to the mining programme well in advance.
2	Customary fishing may be significantly affected by changes in the location, abundance and habitat of fished species due to regulatory limitations on customary fishing.	Ecology, Sedimentation and Coastal Matters	Response Evidence: Evidence of Dr Alison MacDiarmid (Marine Ecology) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025'	Refer to paragraphs 47 to 54 of the 'Evidence of Dr Alison MacDiarmid (Marine Ecology) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025'
3	The applicant's assessment of effects does not consider impacts on nursery habitat for blue cod, and whether this might constitute material harm.	Ecology, Sedimentation and Coastal Matters	Response Evidence: Evidence of Dr Alison MacDiarmid (Marine Ecology) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025'	Refer to 'Evidence of Dr Alison MacDiarmid (Marine Ecology) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025'
4	Should the application be approved, the applicant should engage further with tangata whenua and fisheries stakeholders to support development of appropriate validation, monitoring and reporting requirements.	Planning	Attachment 1: Proposed Marine Consent Conditions: Conditions 47 – 59, 60 – 64, 72 – 82 and 86	The proposed consent conditions include technical monitoring conditions (Conditions 47 – 59) as well as stakeholder engagement and communication conditions with tangata whenua and fisheries stakeholders (Conditions 60 – 64, 72 – 82, and 86). It is noted under section 70 of the FTAA, all submitters must be invited to comment on any draft conditions ahead of any decision being made. This will ensure stakeholders will have the opportunity to comment on conditions.
5	Should the application be approved, work should be undertaken to verify there would be no material harm to the nursery habitat in the project area and the species utilising the habitat.	Ecology, Sedimentation and Coastal Matters	Response Evidence: Evidence of Dr Alison MacDiarmid (Marine Ecology) on behalf of Trans-Tasman	Refer to 'Evidence of Dr Alison MacDiarmid (Marine Ecology) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025' - Impacts on rocky reefs (paragraphs 24 to 29).

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
			Resources Limited in response to comments received 13 October 2025'	

Comments from the Minister for Resources and Regional Development

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
1	The Project will have significant regional and national benefits but it is unclear whether there are opportunity costs or wider impacts to prevent the project from proceeding, including addressing of fisheries and offshore wind energy.	Legal	N/A	Cost Benefit Analysis is not a requirement for this application. It is not mandated by the FTAA or the EEZ Act, and the updated economic assessment provides an appropriate evidential basis to assess the Project's benefits.

Comments from the Minister for Māori Development and Māori Crown Relations

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
1	The Expert Panel should have regard to comments received regarding impact on customary food gathering, quota allocation and management under the Māori Fisheries Act and statutory acknowledgements of Treaty Settlements in the area.	Planning	N/A	The Minister states a neutral position and directs panel to consider treaty matters, impacts on customary gathering, kaitiaki and Māori fisheries and treaty settlement matters. These matters are addressed in the substantive application and response to other received comments.

Comments from the Associate Minister of Transport

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
1	The 2015 Maritime and Navigational Report submitted with the substantive application should be reviewed by the applicant to ensure the report remains current.	Planning	Substantive FTA Application: Section 5.13.6 Supplementary Technical Package: 26 Attachment 1: Proposed Marine Consent Conditions 30-32, 67-69 & 90-102.	While the Maritime and Navigational Impacts report is dated 2015, the conclusions of the report are still considered relevant as no major changes in the maritime or shipping use patterns of the Project area have changed since the report was originally published. The Project area is removed from regular marine traffic routes and activities and would typically operate only within 300m x 300m working blocks. As a result, the Project would not be in conflict with other marine traffic and commercial shipping activities in the STB area. All vessels will operate in accordance with Maritime NZ 'Maritime and Marine Protection Rules' and WorkSafe NZ requirements which would manage maritime emergency matters. Conditions 30-32 will require the consent holder to mitigate and where practicable, avoid, adverse effects on existing interests under all activities authorised by the consents. Conditions 67-69 require the preparation of a Collision (Loss of Position) Contingency Management Plan, the purpose of which is detail preventive and responsive measures to collision events to minimise the risk of such events occurring and/or impacts of any collision events.

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				Conditions 90-102 addresses marine safety matters and will require the design of the IMV as well as operations of the project to accord with best practice as well as undertake detailed investigations and ongoing monitoring that inform the best practice operations.
2	Supports the application as it aligns with the Government priorities for Economic Development.	Planning	N/A	The support for the application is acknowledged.