New Plymouth District Council Comments on the Taranaki VTM Project

1. Contact Details	
Please ensure that you have authority to comment on the application on behalf of those named on this form.	
Organisation name (if relevant)	New Plymouth District Council
Name	[redacted]
Postal address	[redacted]
Phone number	[redacted]
Email ***(a valid email address enables us to communicate efficiently with you)***	[redacted]

2. We will email you draft conditions of consent for your comment			
☒	I can receive emails and my email address is correct	☐	I cannot receive emails and my postal address is correct

3. Please select the effects (positive or negative) that your comments address:			
☒	Economic Effects	☒	Sedimentation and Optical Water Quality Effects
☐	Effects on Coastal Processes	☒	Benthic Ecology and Primary Productivity Effects
☒	Fished Species	☒	Seabirds
☒	Marine Mammals	☐	Noise Effects
☒	Human Health Effects of the Marine Discharge Activities	☐	Visual, Seascape and Natural Character Effects
☒	Air Quality Effects	☒	Effects on Existing Interests
☐	Other Considerations (please specify):		

General Comments

New Plymouth District Council (NPDC) appreciates the opportunity to provide feedback on the fast-track application submitted by Trans-Tasman Resources Limited (TTRL) for seabed mining operations in the South Taranaki Bight.

NPDC provided an opportunity to TTRL managing director Alan Eggers to workshop the proposal, to provide balance to the Councils consideration of a Notice of Motion recommending opposition to seabed mining. Mr Eggers presented to NPDC in June 2024. Prior to Council's decision on the Notice of Motion on 24 June 2025, numerous members of the public gave deputations at the Council meeting, in which compelling evidence was presented in respect of biodiversity and cultural values.

NPDC is aware that environmental impacts of the activity have been subject of significant evidence through previous resource management processes including legal proceedings. A key finding of the Supreme Court was that having considered all the evidence, the effects of the activity were so uncertain that the application must be declined unless further information could be provided. This applied to the modelling and impact of the plume, the effect on marine mammals and seabirds, and the effect on rocky reef ecosystems. In TTRL's application to the Fast Track process, no new studies of any of these subject matters are included.

NPDC does not consider the application should be approved in its current form on the basis that the information presented by the applicant to date does not sufficiently address potential significant adverse effects. It is disappointing that the information deficiencies have not been addressed by the applicant, and the unwillingness to address the issues raises credibility concerns.

We agree with the Taranaki Regional Council ("TRC") comments urging the Expert Panel take a conservative approach to uncertain environmental effects and assume a plausible worst case to base its assessment on. We urge the panel to favour caution and environmental protection through application of the precautionary principle, to ensure the social, environmental, economic and cultural wellbeing of the Taranaki Region, New Plymouth District, and its people.

The key test under the FTA[1] is whether the adverse impacts of an application are sufficiently significant to be out of proportion to the project's regional or national benefits. In our view, the effects of the current proposal are out of proportion to the project's regional or national benefits. The proposed seabed mining operation poses significant environmental risks to marine biodiversity and culturally significant areas, while offering uncertain long-term economic benefit to the region.

In assessing the Project's adverse impacts and regional benefits NPDC supports the comments provided by the TRC. We also support the comments of South Taranaki District Council ("STDC"), as our neighbours and the territorial authority most impacted by the proposal.

[1] Section 85 of the FTA outlines that an approval may be declined if adverse impacts are out of proportion to regional or national benefits.

The economic benefits of the project are questionable

NPDC considers there are few assurances that the economic benefits will be realised in the Taranaki region.

The independent Economic Impact Assessment by the New Zealand Institute of Economic Research ("NZIER") outlines the following direct and indirect benefits for the New Plymouth District:

- **Employment Creation -** Directly employ over 300 high-value positions in Taranaki, a further 170 jobs in the region in services, 1,125 jobs in the region in logistics, services, provisioning, supplies, bunkering, maritime operations, heavy engineering and training activities (regional support) and indirectly creating more than 1,365 jobs nationwide. The Project will also actively support regional and national workforce development;
- **Head Office in New Plymouth -** The head office will employ 35 professional staff in corporate management, HR, health and safety, ore marketing, metallurgy, geosciences, recruitment, accounting and project administration;
- **Regional Investment -** An annual spend of NZ$234 million in Taranaki on employment, services and regional support activities particularly in areas like New Plymouth, Hawera and Whanganui; and
- **Port of Taranaki and Whanganui Port Upgrades -** Supply, maritime logistics, marine research and monitoring, geology and grade control drilling vessels will be based at both Ports.

While NPDC supports economic development this should not be at the expense of environmental degradation which will occur primarily outside our district (with the potential of also impacting our district).

The method and accuracy of the previous economic assessments has been challenged in previous legal proceedings, including how many jobs would be new jobs; how many would be likely to be awarded to locals versus importing expertise from overseas; where the majority of profits would be likely to accrue; and the fact that the impact on non-market values, including adverse effects on the environment, have not been quantified.

NPDC notes that the NZIER assessment does not consider the issues raised in the Social Impact Assessment ("SIA"), undertaken by Croydon 2016 (page 1) that "*the significance of job creation as a social effect will depend upon the location of the workforce and the extent to which the local workforce can access those positions.*"

The SIA states at page 39:

> *"The proposed shift-work regime will create the potential for a FIFO/DIDO*[2] *workforce that could reside over a large geographic area. Based on the findings of existing offshore operations in Taranaki, it is estimated that approximately 30-40% of the offshore workers will permanently reside*

---

[2] The fly-in-fly-out / drive-in-drive-out (FIFO/DIDO) workforce is enabled as the offshore positions will operate on a 21 day on / 21 day off roster.

in New Plymouth District, 12-20% in South Taranaki District, 4% in Stratford District, 0-10% in Whanganui District, 35-40% elsewhere in New Zealand, and 5% overseas."

The SIA at p40 further states:

"It is unlikely that the new jobs created will significantly reduce the relatively high levels of unemployment in the "local area" and "wider area", because of the specialised skill levels that will be required for most of the new positions."

Given the uncertainty as to how many jobs will be undertaken by a workforce who live in the Taranaki Region, NPDC supports the conclusion of TRC:

Council [TRC] considers the project would likely provide significant gross economic benefits to the region but cannot yet reach a judgement on if there would be significant net economic benefits.

NZIER estimate benefits for the wider New Zealand economy, including during the 20-year operation phase of the Project, TTRL will contribute NZ$36 million to NZ$54 million in royalties per year and NZ$91 million to NZ$136 million in corporate taxes per year to the New Zealand Government. These funds do not accrue to Taranaki, and it should be acknowledged that local government in Taranaki has raised on numerous occasions that Crown royalties should be hypothecated to the originating region. As such, they should be discounted from the assessment of the regional benefit by the Panel.

NPDC understands there is uncertainty around where extraction of minerals will take place from the raw product. If the mined product is exported there is a risk of higher value royalties landing offshore. NPDC considers it is important to confirm viable extraction methods and locations, to ensure royalties benefit New Zealand.

The economic analysis undertaken by NZIER estimates economic benefits of the Project for Taranaki and Whanganui regions. However, these estimates do not account for input constraints, price changes and effects in other sectors that offset the Project's positive impacts on the economy arising from increased production, for instance to commercial fishing or offshore wind generation.

NPDC supports the findings of a peer review of the NZIER economic assessment undertaken by Market Economics, commissioned by the TRC, which concluded that:

While NZIER's expenditure-focused assessment follows conventional practice and provides credible impact estimates, it does not fully evaluate broader economic benefits (as distinct from impacts) or account for potential adverse environmental/social effects identified in the Project Report.

NPDC considers that in determining the significance of the economic benefits, there should be more detail as to the scale of benefit that is national versus regional. NPDC consider the focus should be on regional benefits, given the risk and location of potential impacts, and given the economic conditions of our region following changes to the oil and gas industry.

If the application is approved, to ensure the regional benefits eventuate, conditions of consent should be imposed stipulating the location of training course providers, location of the head office within Taranaki, requirement to use Port Taranaki as a base, and a percentage of the workforce required to reside in the region. Without such conditions there is a real risk that the economic benefits claimed by the applicant would not eventuate.

The negative economic effects are significant

There is significant uncertainty about seabed mining and offshore wind being able to co-exist. Seabed mining is not included in Taranaki's regional economic development strategy[3], but offshore wind energy is. Offshore wind developers have commissioned a 2024 study from PWC[4] that states that seabed mining will limit offshore wind development on the South Taranaki coast.

The Taranaki Mayoral Forum wrote to Minister Simeon Brown on 19 September 2024 to urge the government to undertake a comprehensive risk analysis to fully understand the science, the operating models of both seabed mining and offshore wind development, and the positions of the various parties involved before making any decisions to ensure we do not lose the possibility of an offshore wind development occurring off the Taranaki coast. To date the Government has not undertaken this analysis.

Although the EEZ Act only considers the impact on existing activities, NPDC is of the view that the Expert Panel should consider the significant opportunity costs of the risks to offshore wind development when considering the scale of economic benefits claimed by the applicant. Offshore wind has the potential to provide significant, and long-term, economic benefits of $12b to $94b in GDP nationally[5], however BlueFloat Energy has already cancelled its plans for an offshore wind farm due to TTRL being included within the Fast-Track Approvals Act.[6] Approval of the TTRL application has the real potential to see other developers withdraw and see a net loss for Taranaki's economy.

There has been long-standing opposition from the Taranaki community to this proposal, including from iwi led by Ngāti Ruanui and Ngaa Rauru, environmental groups, divers and recreational fishers, and opposition from other commercial operators such as the fishing industry which actively opposed the applications at the EPA level and all the way to the Supreme Court, over the period 2013 – 2024. NPDC urges the panel to quantify and consider potential impacts on existing recreational and commercial activities that take place in the South Taranaki Bight.

NPDC also highlights that tourism is a key industry identified for the region's diversification following the transition away from Oil and Gas. We are concerned that the proposal, with its widespread opposition, could be detrimental to the region's tourism brand. NPDC urges the panel to quantify and consider the opportunity costs associated with tourism opportunities as well.

NPDC supports the comments made by TRC at sections 9 and 10 of their written comments regarding insurance and post-extraction responsibilities. NPDC are very concerned about the continuing existence and financial viability of the Applicant. We are concerned that the proposal could generate legacy issues for our region if there is a disaster impacting the operation, or if the company abandons the project, as has

---

[3] Taranaki-2050-Roadmap.pdf
[4] National Impacts Report: New Zealand Offshore Wind Industry (Final Embargoed - 20 March 2024)
[5] National Impacts Report: New Zealand Offshore Wind Industry (Final Embargoed - 20 March 2024)
[6] Wind power firm departs, amid fast-track controversy over seabed mining | RNZ News

occurred with some legacy oil and gas operations. Potential costs associated with a clean-up should be considered in terms of the net economic benefits associated with the project.

We urge the panel to ensure New Zealand taxpayers and ratepayers will not be left with the cost of cleaning up environmental degradation or abandoned infrastructure.

These negative economic effects negate the questionable economic benefits outlined above.

There are real and significant environmental concerns

There remains a lack of understanding of the receiving environment's values and the vulnerability of species present, and therefore considerable uncertainty around the adverse effects of the proposal.

NPDC heard a deputation on 24 June 2025 from Karen Pratt (Project Reef) who is one of the co-authors of 'Offshore Subtidal Rocky Reef Habitats on Pātea Bank, South Taranaki' – prepared for the TRC in September 2022. This report is referred to in TRC's comments as the Morrison report.[7]

The new information contained in the Morrison report highlights:

- gaps in the assessment regarding known reef locations and associated biota;
- uncertainty regarding other potential reef locations; and
- uncertainty regarding the sediment plume modelling approach.

The Pattle Delamore Partners Limited (PDP) peer review of the ecological assessments undertaken by TTRL, which was commissioned by TRC, notes at page 75 that this new information has not been included in the TTRL 2025 application:

> *While the studies supporting the TTR application have been comprehensive, the 2025 application does not appear to include more recent information on the presence of offshore subtidal rocky reef habitats on Pātea Bank (outlined in Morrison et al., 2022). Concluding that rocky reef habitat is more common and widespread on the Pātea Banks than previously documented, it is important that the presence of subtidal rocky reef habitat within, and adjacent to, the application area is defined and subsequently considered, given the potential effects of the proposed activity on these systems.*

NPDC also heard a deputation from the Ngā Motu Marine Reserve Society (NMMRS) which questioned the reliability of the environmental data in relation to kororā (little blue penguin) population which inhabits the vicinity of the proposed project.

Overall, NPDC endorses the comments from TRC that the Panel gives–

> *close consideration to the knowledge gaps with regards to seabirds and marine mammals, as well as the uncertainty associated with the models that have been employed to fill these knowledge gaps, and how the Expert Panel will take into account the need to favour caution and environmental protection regarding potential effects on these animals.*

[7] Morrison Report

Note that the need to favour caution and environmental protection in the above matters will be particularly important for sensitive or endangered species such as pygmy blue whales, Hector's and Maui dolphins, the little penguin (Eudyptula minor), and the relict fairy prions (Pachyptila turtur)".

Emissions and discharges need to be understood and carefully managed

NPDC supports the comments made by TRC at sections 7 and 8 of their written comments, regarding sulphuric dioxide, nitrogen oxides, carbon dioxide and metals. NPDC urges the panel seek to fully understand the project's potential for acidification. NPDC are concerned that if not well managed, air emissions and water discharges may generate adverse environmental. If approved, NPDC considers conditions should be in place to ensure robust thresholds, monitoring, reporting and accountability for the health of the receiving environment including workers.

The project will negatively impact on cultural values

The application has severe shortcomings in terms of understanding of cultural values, how the project would impact them, and how to respond to cultural effects.

TTRL managing director Alan Eggers appeared before NPDC in June 2025, and stated that the company had engaged with local iwi, taking into account their concerns "*as best we understand them*".

NPDC received deputations from tangata whenua on 24 June 2025 that there has been limited consultation. All eight iwi of Taranaki have jointly stated that they oppose seabed mining and TTRL's application.

There are some excellent examples of government and developers working alongside tangata whenua in our region, to reach positive planning outcomes.

The EEZ Act must be interpreted consistently with Te Tiriti o Waitangi principles, requiring active consideration of Māori interests. Tikanga Māori is part of "other applicable law" decision-makers must consider. NPDC urges the panel to properly assess Māori cultural values, customary rights, and environmental guardianship (kaitiakitanga), giving sufficient weight to iwi concerns and tikanga.

As stated in the New Plymouth Part Operative District Plan Strategic Objective TW-15 (3) *tangata whenua are the only people who can identify impacts on their relationship with their culture, traditions, ancestral lands, waterbodies, sites, areas and landscapes and other taonga of significance to Māori*.

NPDC urges the Expert Panel to carefully consider the cultural advice provided by Iwi and hapū. If approved, we support conditions to ensure a significant kaitiaki role for mana whenua.

Consultation and engagement with Council and our community

NPDC is also concerned that TTRL do not have an enduring and positive relationship with the wider range of stakeholders in the community.

There is a track record in the Taranaki region of large industry (notably oil and gas) developing a social licence with the community by listening, responding with robust information, and managing the effects of their activities well.

Summary

As outlined above the 2025 application has significant information gaps due to the considerable uncertainty regarding adverse effects and the presence of both vulnerable and highly valued ecosystems and species in the South Taranaki Bight.

The net economic benefits of the project cannot be determined due to the uncertainty of where the jobs will be located and how the inclusion of non-market costs of adverse social and environment effects would change the economic impact assessment prepared by NZIER.

In addition, NPDC considers that the net economic benefits (which are currently not well understood) should be tempered by the extent to which a given community wants that development to occur. Seabed mining is not included in Taranaki's regional economic development strategy, and NPDC is concerned that the TTRL project will be detrimental to existing customary and recreational activities and to other potential economic projects including tourism and offshore wind farms, that would provide greater benefit to the Taranaki Region.

Many in Taranaki do not perceive the project's economic impact as being of 'benefit' to the region. Large numbers of Taranaki people have opposed seabed mining for many years, and NPDC has concerns about the social and cultural wellbeing of Taranaki people should the proposal in its current form be granted.

NPDC considers that the potential adverse impacts are sufficiently significant to be out of proportion to the project's benefits, even after taking into account potential conditions and modifications to the consent sought. NPDC therefore requests that the Expert Panel decline the application from TTRL.

If the panel is looking to approve the application NPDC welcomes further engagement on a comprehensive set of consent conditions.