

3 October 2025

Taranaki VTM Fast-track Application
Environmental Protection Authority
Private Bag 63002
Wellington

Tēnā koutou panel members

Taranaki VTM Project – Seabed Mining Application

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

The Council wishes to formally express its position on the proposed activity and does not support any development that may result in environmental degradation or adverse effects on the South Taranaki Bight, that would be considered more than minor. The Council does not support the application due to the significant uncertainty surrounding the environmental impacts on the Bight, the lack of robust assessment and evidence of economic benefits to South Taranaki, particularly given the operations are proposed within the district, and the strong opposition expressed by many sectors of the South Taranaki community.

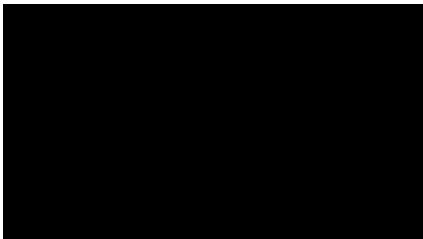
This position is informed by direct engagement with South Taranaki Iwi, interest groups, organisations and individual members of the community who have consistently raised concerns about the environmental, cultural, and social impacts of seabed mining in the region. The Council acknowledges and respects these perspectives, and notes the strong and sustained opposition from these parties, who have highlighted potential harm to the marine environment, disruption of cultural values, and risks to coastal livelihoods.

STDC is concerned that the application lacks sufficient detail to enable a robust assessment of the environmental effects. The absence of comprehensive and transparent information limits the ability of decision-makers and affected parties to understand the full scope of potential impacts. Without clarity on the environmental consequences, it is not possible to make an informed decision that sufficiently safeguards the interests of the South Taranaki community and its natural environment.

Should the fast-track application be approved, STDC requests that the conditions set out in the comment attached are considered.

The South Taranaki District Council thanks the Panel for considering the points raised in this submission.

Ngā mihi nui



Koromatua o Taranaki ki te Tonga
South Taranaki Mayor

Attachment – South Taranaki District Council Comment

Your Comment on the Taranaki VTM Project

Please include all the contact details listed below with your comments.

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)	South Taranaki District Council
First name	██████
Last name	██████
Postal address	██
Phone number	████████
Email (a valid email address enables us to communicate efficiently with you)	████████████████████

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): -Social/community effects		

Please provide your comments below. You may include additional pages if needed. If you are emailing this form and attaching any supporting documents, please list the names of those files below to help us ensure all materials are received.

Key issues

Introductory comments

1. South Taranaki District Council (STDC) welcomes the opportunity to make comments as a relevant local authority under Section 53(2)(a) of the Fast Track Approvals Act (FTAA). STDC supports economic growth and development in its district that provides for the social, economic and environmental needs of its residents. However, due to the uncertainty around environmental effects /impacts STDC continues to oppose the activity in this application.
2. STDC acknowledges that the panel has invited comments from a wider range of stakeholders representing the public interest. These comments are made from a technical basis to assist the panel in making its decision under the FTAA. They do not indicate support for the project and do not indicate a change to STDC's position to oppose the activity proposed in the application.
3. STDC endorses the overall comments made by Taranaki Regional Council and the technical reviews undertaken by PDP and Market Economics. STDC's comments elaborate on relevant matters under its jurisdiction as the territorial authority most impacted by the proposal.
4. STDC has also liaised with NPDC and works in partnership with iwi in its District under its Pou Tikanga Partnership Framework. STDC recognises that there are strong views held by iwi in opposition to this proposal. STDC urges the panel to ensure they receive cultural advice from the impacted iwi authorities to inform their decision making on the application.

STDC comments

5. The issues canvased in these comments are of particular interest in the South Taranaki district relating to economic, social and community effects and effects on existing interests. Comments are made on matters in the substantive application, and on the conditions proposed in Attachment 1 to this application. It is hoped that this will help focus the panel by highlighting matters that require further consideration.
6. STDC is concerned about the information gaps as outlined in the TRC submission and as summarised in paragraph 2. The technical assessment from PDP highlights that further information is required to accurately assess the impacts of the activity particularly in regard to marine mammals and birds and the effects of the sediment plume. STDC's comments are provided in this context with the concern that these adverse effects are out of proportion to the regional benefits.
7. STDC is also concerned that TTRL do not have an enduring and positive relationship with the wide range of stakeholders in the community. This is intensified due to the uncertainty of the activity and by the lack of social and economic benefits for the South Taranaki community directly.

Economic and Social Impacts:

8. STDC would like to further emphasise the comments made by TRC in section 42 (para 25) on economic significance. STDC is the most directly affected community, so it should receive the greatest share of the economic benefits – that is proportional to the impacts of the activity. As indicated by TRC the application lacks a comprehensive assessment of net economic benefits. Consideration to the full social and economic costs of the activity needs to be considered alongside the gross economic benefits.
9. STDC also supports the TRC recommendation 4.3 (30-f) that seeks to clarify the specific benefit to South Taranaki in particular. The economic assessment considers the impacts for South Taranaki and Whanganui together. This indicates a disproportionate benefit to South Taranaki, with Whanganui positioned to support the more significant port development. Port Taranaki is strategically positioned to deliver more substantial infrastructure and economic uplift for the region, and STDC believes this should be reflected in the panel's consideration. Accordingly, STDC respectfully requests that the panel separately assess the net economic benefits for South Taranaki to ensure a fair and regionally balanced outcome.
10. Although the application states that there will be operational jobs these are not guaranteed to benefit the South Taranaki area. The Social Impact Assessment (Report 30 Croydon) reinforces this point, as the mining and iron ore processing activities occurs offshore, and employment will be fly in and fly out. Surveys of current FPSO workforces indicate that under half of employees reside outside of the region. With main access points to the FPSO located at Port Taranaki and Whanganui there is little benefit for South Taranaki.
11. Consideration to the other recommendations in the Social Impact Assessment should be given to redistribute the economic and social benefits to the South Taranaki District. This includes consideration of deliberate local based employment policies and training, as canvassed in paragraphs 20-30 of these comments.
12. The Social Impact Assessment uses out of date population data. Please refer to attachment 1 that provides up to date data that STDC uses for its planning purposes. This reinforces the social deprivation, particularly in Pātea when compared regionally and nationally. It is noted that there is currently no direct benefit from the project for Pātea.
13. STDC requests further assessment of the economic and social impact on the most affected communities. These communities will be faced with uncertainty regarding the potential effects on the marine environment, with associated risks to environmental quality. STDC seeks a redistribution of the economic benefits to ensure they are directly targeted to the communities most impacted.
14. The Social Impact Assessment (Report 30 Croydon) suggests that the Recreation and Tourism effects are minor. Due to the incomplete nature of the impacts of the application on the marine environment (as highlighted in the PDP review) this assessment cannot be made with

confidence. On this basis STDC request that the panel reassess the impacts on recreation and tourism.

Offshore renewable wind energy opportunities

15. The offshore renewable wind energy sector has advised STDC that the proposed seabed mining operations are incompatible with future wind energy developments in the South Taranaki Bight. In contrast, Trans-Tasman Resources (TTR) has indicated that both activities can co-exist within the same marine area. STDC respectfully requests that the panel give careful consideration to this matter in its decision-making and actively engage with the wind energy sector to understand the implications.
16. STDC also wishes to draw the panel's attention to the Offshore Renewable Energy Bill, which is expected to be enacted by the end of 2025. This legislation will establish a regulatory framework for renewable energy activities in the marine environment.
17. Clause 6 of Schedule 10 of the Fast Track Approvals Act 2023 (FTAA) outlines the criteria for assessing marine consent applications. Specifically, Clause 6(1)(d) refers to Section 59 of the Exclusive Economic Zone (EEZ) Act, which includes consideration of "the nature and effect of other marine management regimes." The enactment of the Offshore Renewable Energy Bill will introduce a new regime that directly applies to renewable energy activities in the South Taranaki Bight.
18. STDC considers this a legitimate pathway for assessing the impact of the proposed mining activity on alternative marine uses. Accordingly, STDC requests that the panel explore this matter further and engage with the offshore renewable wind energy sector as part of its deliberations.

Comments on conditions:

19. To assist the process STDC has made comments on the potential conditions provided in the application. This is not an exhaustive list but are comments provided in good faith to assist the process. These comments do not indicate any support from STDC for the application and is not a comprehensive assessment of all conditions. If the Expert panel is of a mind to grant the application then STDC would provide a full assessment of draft conditions under Section 70 of the FTAA.

Condition 83 Community Fund.

20. STDC acknowledge the offer for a community fund as there will be effects on the South Taranaki community. However, an annual fund of \$50k fund per annum is a blunt approach. STDC requests that the funding amount is not capped at \$50k but instead related to the proportionality of the effects of the activity. Due to the uncertainty around the activity STDC expects the fund to be significantly higher (ie \$200k per annum).

21. Areas most impacted by this activity are those facing significant deprivation. Pātea rates at the highest of the deprivation index (2023 Census). For this reason community funding needs to focus on building the capacity of the community to be able to implement projects. STDC needs to be provided with flexibility to administer the fund to achieve these outcomes.
22. STDC has experience in community funding and regularly allocates funding to community groups. There are administration costs associated with operating the fund that are on top of the 'fund amount'. These administration / operational costs need to be captured in addition to the fund amount so that they are not a burden for rate payers.

Condition 84: Training Facility

23. The substantive application states that a training facility, based in Hāwera be established 12 months prior to the IMV activities. It is stated that the purpose of the facility is to provide "technical and marine skills-based training to prospective trainee process operators and maintenance support staff.". The condition requires consultation with various parties of the community, including STDC when established.
24. STDC support the intent of this condition but request clarity in the condition on the scope, scale, location and longevity of this facility and in particular:
- Confirmation that the facility will train local South Taranaki District residents and Iwi uri. This is currently captured in an advice note but STDC require more certainty and request that this is noted in a condition and that this can be measured (ie: inclusion of a percentage).
 - Further clarity on the location and size of the facility. STDC support its location in the South Taranaki District.
 - The scope of activities that participants will be trained in and for this to be comprehensive and provide for transferable and enduring skills. Training areas should extend to monitoring activities, including training in mātauranga.
 - Recognise that the facility will operate for the life of the project and will also be in place during the decommissioning and long-term monitoring.

New Condition (Scholarships)

25. In addition to the training centre it is requested that scholarships are provided to South Taranaki Residents to gain tertiary level training that would then work on the project. Further discussion is required on the number of scholarships, and the scope of training but it is anticipated that this would cover science, engineering, coastal processes, sustainability, planning, Mātauranga Māori. STDC also recommends that TTRL offer work placements or internship opportunities throughout the course of study, ensuring that South Taranaki residents are not only trained but actively engaged in the project's development and delivery.

New Condition (Information Centre)

26. Conditions 81-82 require the establishment of a website and community meetings. In addition to this STDC also request that the TTRL have a physical information centre that is based in Pātea. There is high level of public interest in the application in this community as they are in closest proximity to the activity.
27. The information centre will provide transparent and real time data and information on the project and monitoring outcomes. It will also provide an opportunity for TTRL to develop its relationship with the community. STDC sees a significant gap with TTRL and its relationship with the community and is concerned about the on-going social effects this will lead to if the activity proceeds.
28. STDC is able to work with the panel to provide further clarity on this request.

New Condition (Main head office)

29. STDC supports the request from TRC section 4.2 (para 28) that the proposal for a head office to be located in Taranaki is included as a new condition. However, it is requested that the head office is located in the South Taranaki District to redistribute the benefits to South Taranaki.

New Condition (Main head office)

30. STDC requests that a condition be included requiring the establishment of a helipad in either Pātea or Hāwera to support the operational needs of the project, should it be approved. This infrastructure would provide critical logistical support, particularly in the event of emergencies or for the efficient transport of personnel and equipment. The location should be determined in consultation with STDC to ensure alignment with local planning and community considerations.

Summary:

31. STDC thanks the Expert Panel for providing the opportunity to comment on this application as a relevant local authority. Representing the community most impacted by this proposal STDC welcomes further discussions on the matters in the application. If the panel is looking to approve the application STDC also welcomes further engagement on a comprehensive set of consent conditions.