

**Expert Panel Hearing on Trans-Tasman
Resources Ltd's Application to the EPA
under the Fast Track Approvals Act (FTAA)
– The Taranaki VTM Project**

Climate Justice Taranaki Presentation

21st October 2025

www.climatejusticetaranaki.info

Our key points of submission

Climate Justice Taranaki (CJT) is strongly opposed to the TTRL application and ask that the Panel declines it in full.

1. The claimed regional and national benefits are overstated and would be far outweighed by the **environmental and social costs**.
2. The project would increase risk on globally and nationally threatened species and areas of outstanding natural character.
3. It'd contribute to increasing **cumulative effects** from human activities, in a rapidly changing marine environment. These have not been properly assessed.

Inflated benefits: TTRL modelling **overstates** regional and national benefits.

Costs: Social and environmental costs understated / not understood
e.g. Impacts on fisheries, cultural values, ecosystem services

<https://www.treasury.govt.nz/sites/default/files/2015-07/cba-guide-jul15.pdf>

<https://theconversation.com/treasury-has-a-great-cost-benefit-calculator-for-big-spending-projects-we-just-need-to-use-it-better-263619>

Risks: Dangerous incidences causing environmental disasters more likely with extreme weather events & seismic activities...

Do current regulations including the amended EEZ Act protect Aotearoa adequately? e.g. clean up & remediation costs

Do regulators have the capacity to manage these?

Technological shifts & Corporate push back

Many global steelmakers are shifting to scrap-based Electric Arc Furnace to support decarbonisation and resource circularity.

<https://www.globalgrowthinsights.com/market-reports/ac-alternative-current-electric-arc-furnace-eaf-market-120152>
<https://www.pacificsteel.co.nz/sustainability/eaf/>

As of May 2021, companies including BMW Group, Samsung SDI, Google and Volvo Group, joined the call for a global moratorium on seabed mining, and for alternatives. The companies each **pledged not to source seabed minerals**, to **ensure such minerals are excluded from supply chains** and to not finance such mining.

<https://www.reuters.com/business/sustainable-business/google-bmw-volvo-samsung-sdi-sign-up-wwf-call-temporary-ban-deep-sea-mining-2021-03-31/>

How economically viable is Taranaki VTM?

Cumulative Effects

Assessments for applications could focus on the overall effects, including **synergisms**, of adding an application to the effects already occurring, and predicted to occur, in coming decades. This is consistent with **Sections 6, 28, 33 and 59** of the EEZ-CS Act, which provide broad discretion, and is also consistent with the **Precautionary Principle**. Instead, reductionist, 'siloed' approaches are adopted.

Cumulative Effects EEZ-CS Act

Section 6 Meaning of effect

(1) ... unless the context otherwise requires, *effect* includes—
(a) any positive or adverse effect; and (b) any temporary or permanent effect; and (c) any past, present, or **future** effect; and (d) any **cumulative** effect that arises **over time or in combination** with other effects; and (e) any potential effect of high probability; and (f) any potential effect of low probability that has a **high potential** impact.

(2) Subsection (1)(a) to (d) **apply regardless** of the scale, intensity, duration, or frequency of the effect.

Cumulative effects: Oceanography

The ocean

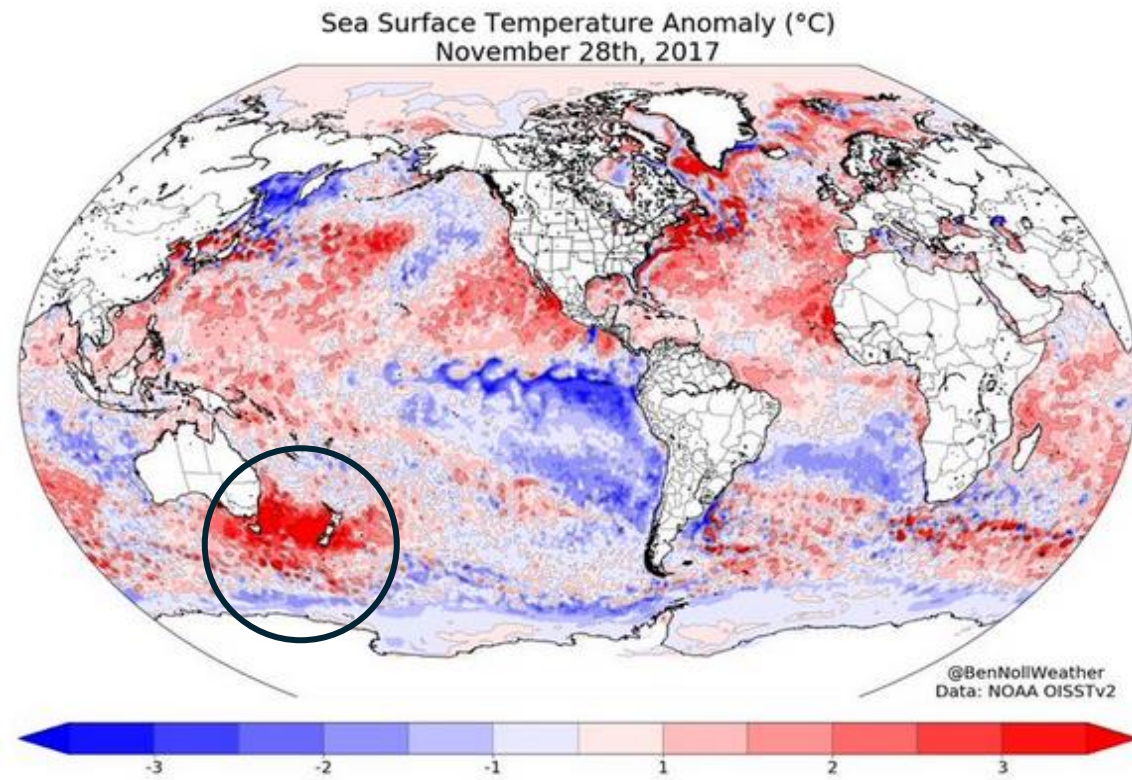
- has **warmed unabated** since 2005, continuing the clear multi-decadal ocean warming trends documented in IPCC AR5; & with **increasing storm strength**
- is **continuing to acidify** in response to ongoing ocean carbon uptake
- is **losing oxygen** overall with a very likely loss of 0.5–3.3% between 1970–2010 from the ocean surface to 1000 m (medium confidence)
- **nutrient cycles are perturbed** and there is high confidence that this is having a regionally variable impact on primary producers
- warming has contributed to **observed changes in biogeography** of organisms ranging from phytoplankton * to marine mammals (high confidence) ...

Aotearoa's seas are no exception, indeed world 'leaders'

https://www.ipcc.ch/site/assets/uploads/sites/3/2022/03/07_SROCC_Ch05_FINAL.pdf

* E.g. see Brown et al. (2024) <https://doi.org/10.1038/s42003-023-05702-4>

NZ EEZ temperature 'snapshot' 28th Nov. 2017



Record-breaking sea temps
have cascading effects on food
webs (eg. 'drastic reduction in
krill biomass').

Johnson et al. (2011) Climate
change cascades: Shifts in oceanography, species' ranges and
subtidal marine community dynamics in eastern Tasmania. JEMBE
doi:10.1016/j.jembe.2011.02.032

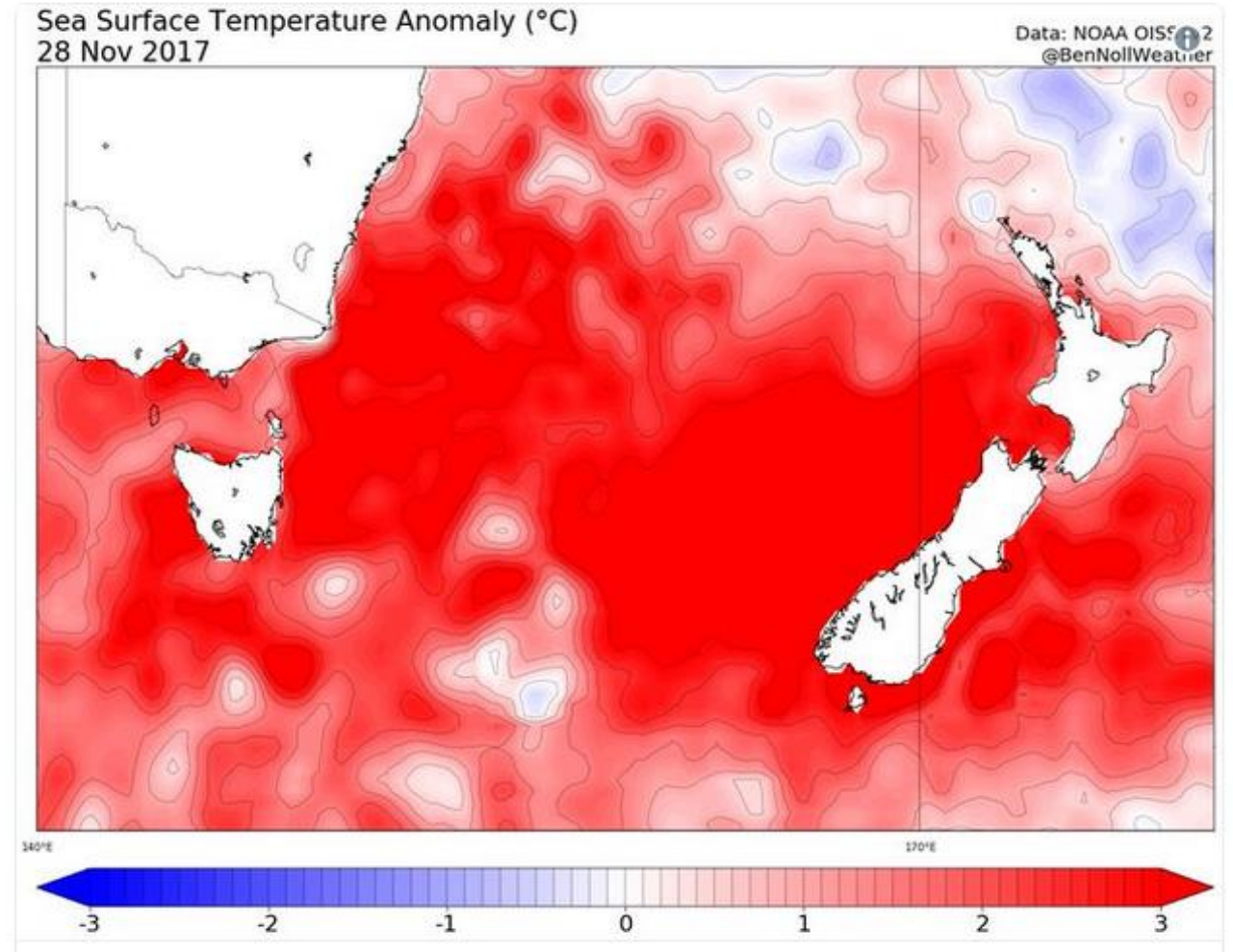
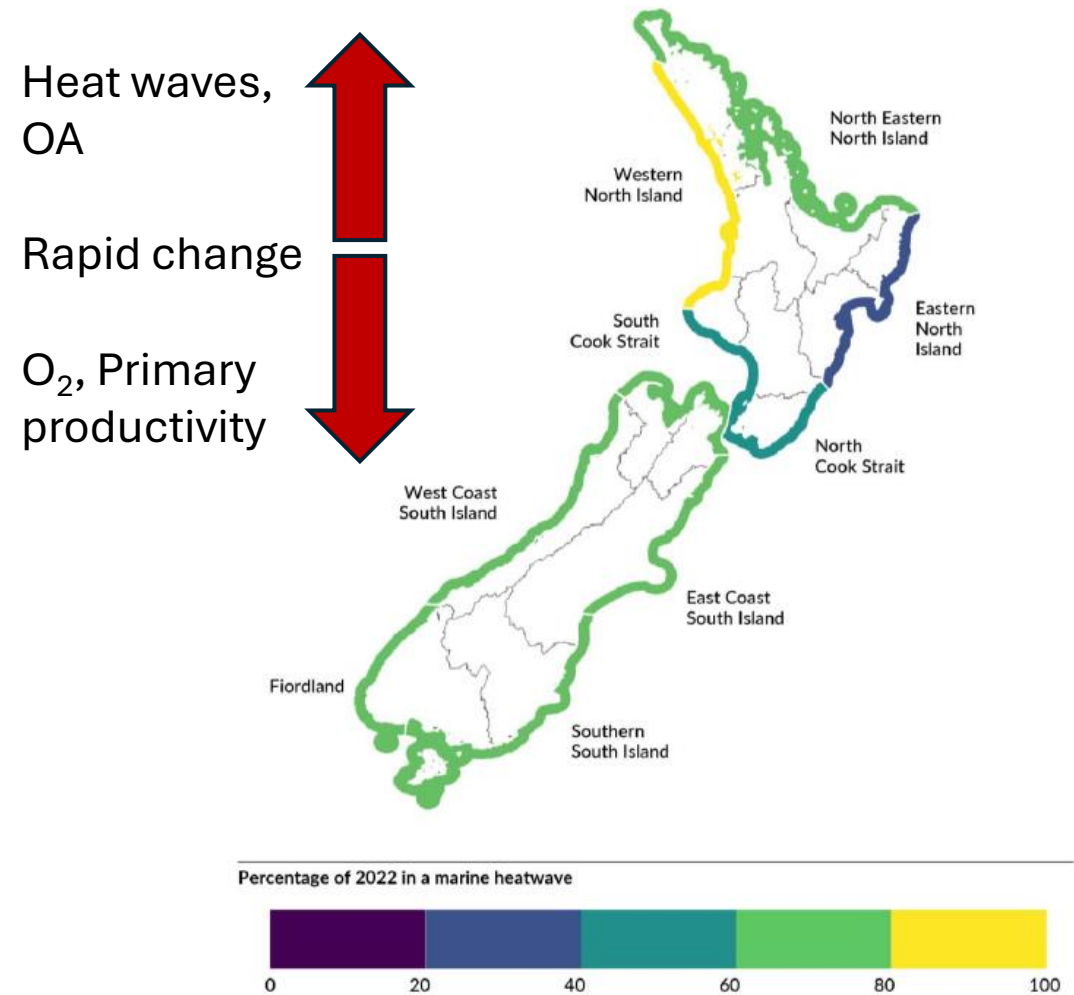


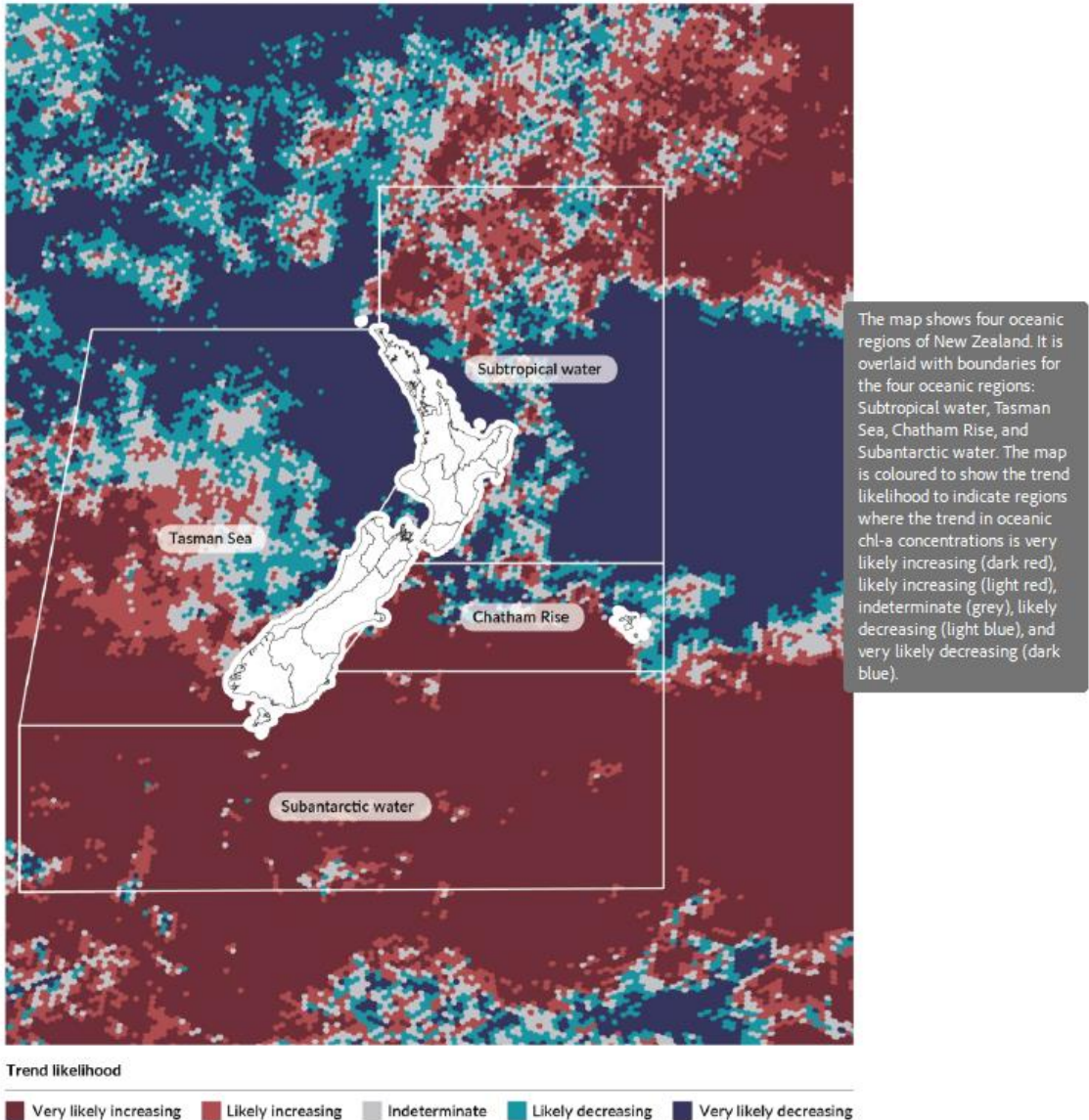
Figure 2: Percentage of year spent in a marine heatwave, by coastal region, 2022



Data source: Stats NZ

Projections show marine heatwaves will continue to grow in frequency, intensity and duration

Figure 3: Trends in oceanic marine primary productivity, 1998–2022



Data source: Stats NZ

Note: See *Our environment 2025: Technical annex* for interpretation of Stats NZ trend likelihood.

Synergisms among Sea temp., Acidification and Noise

“Ocean acidification will decrease sound absorption at low frequencies (<10 kHz), enhancing long-range sound propagation. At the same time, temperature changes can modify the sound speed profile, leading to the creation or disappearance of sound ducts in which sound can propagate over large distances.”

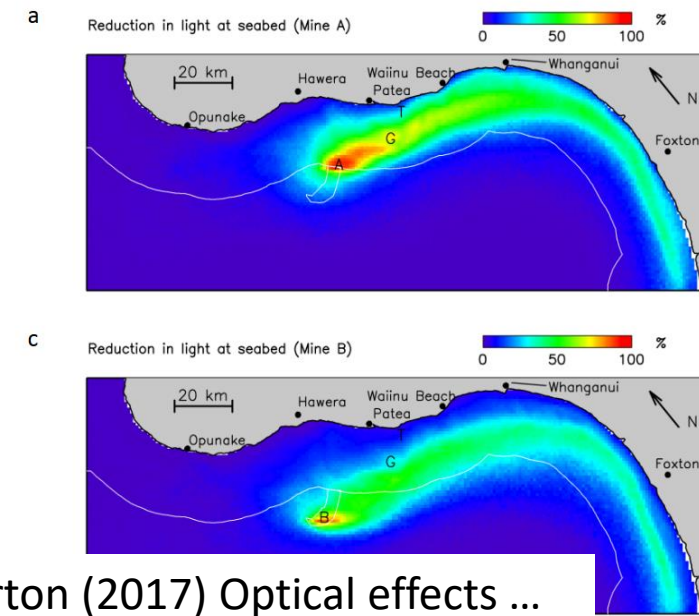
Possenti et al. (2023) Predicting the contribution of climate change on North Atlantic underwater sound propagation. PeerJ 11:e16208
<https://doi.org/10.7717/peerj.16208>

“... without information on the intensity and frequency range of the noise from ... mining ... it is not possible to determine the likely impacts on marine mammals, including physical and behavioral effects” & “... fish species both vocalize and are sensitive to underwater noise...” Excerpts from Expert caucusing, Feb 2024.

Cumulative effects: benthos

Many marine species have narrow physiological tolerance limits set to local environs. Most require specific metamorphosis cues and, for sessile and site-attached species, settlement cues.

Changing conditions may alter or destroy cues, create trophic cascades through food webs. In STB, some species may already be close to limits. Morrison et al. (2022): < 5% of STB seafloor estimated to receive sufficient light to support algae growth (citing Pinkerton 2014). BUT Increasing turbidity from spoil dumping effects. **NOTE: D. Greer's evidence 2017, 2024: plume model 7 sec wave period - underestimate affects plume size and dynamics. Also, natural resuspension is of near-surface sediments, not those from 5-8m deep with potentially different chemistry. Cadmium, Chromium?** Vopel et al. (2017) <https://doi.org/10.1016/j.marpolbul.2017.09.018>



Ecological and biodiversity values. Patea Shoals

Surveys by NIWA in South Taranaki Bight reported **new species** of bryozoans, sponges, annelids, and algae, and **new records** for many groups for the region. NIWA surveys in 2021 focused on Patea Bank, near the TTRL proposal, found subtidal reefs are common, **with many more awaiting discovery ...**

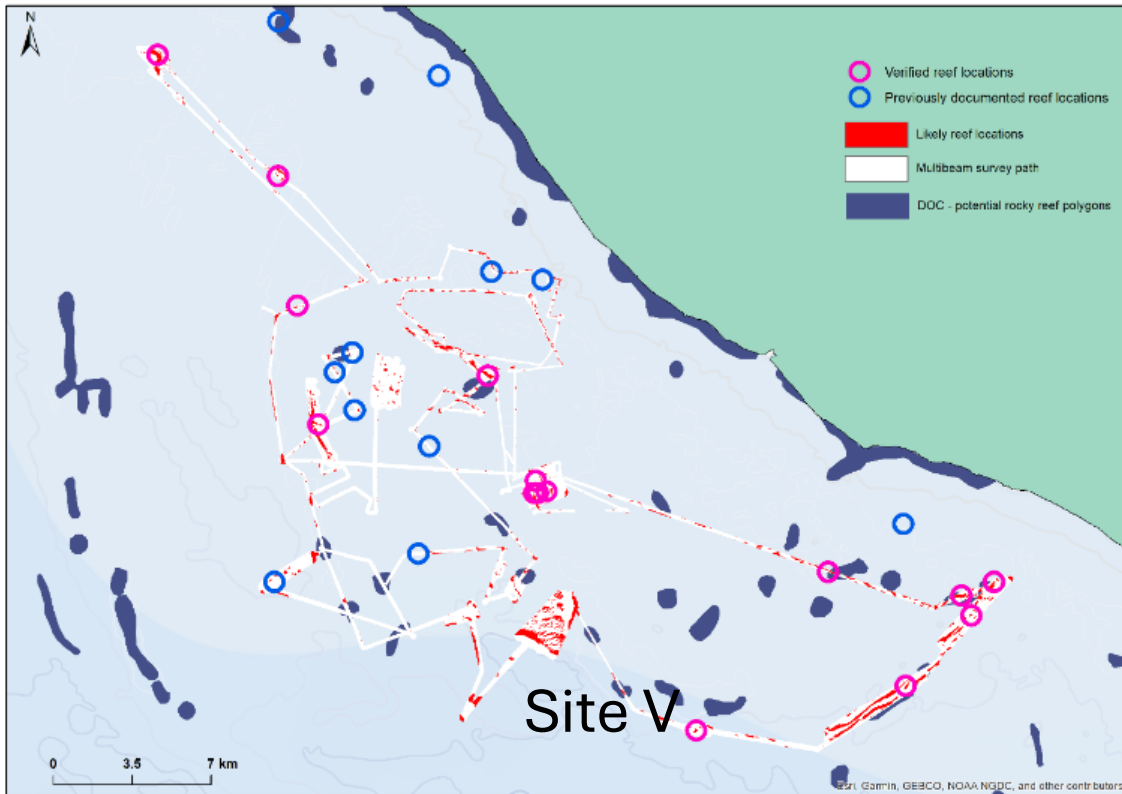


Figure 4-1: Known and likely reefs (by science survey) of Patea Bank circles denote reefs verified with cameras, red polygons are other likely reefs encountered during multibeam sonar mapping, and the blue polygons putative reefs from DOC assessment of abrupt bathymetric changes on old fairing sheets.

https://dc.niwa.co.nz/niwa_dc/srv/api/records/efa4d0c1-ffe5-3540-36ca-e8085a768fdf; <https://www.trc.govt.nz/assets/2238-TRC002-FINAL-Offshore-subtidal-rocky-reef-habitats-on-Patea-Bank-South-Taranaki-2.pdf>

Ecological and biodiversity values. Benthos & fishes

“... Associated with these reefs are **extensive areas of biogenic habitat**, dominated by macroalgae (notably *Ecklonia* forests, *Caulerpa* meadows, mixed macroalgal meadows, and soft bryozoan fields), ... sponge garden ...The **associated fish assemblages are abundant**, dominated by blue cod, scarlet wrasse, butterfly perch, leatherjackets and tarakihi, with other fisheries species likely to be common (e.g., snapper, trevally, kingfish, and kahawai). ... **providing important nursery habitat** ...They are worthy of careful management by the TRC, and other governance entities.” Morrison et al. (2022).

International obligations

Article 8 of the UN Convention on Biological Diversity requires the following of Parties, including New Zealand (which signed and ratified the Convention in 1992 and 1993):

Article 8(d) Promote the protection of ecosystems, natural habitats and the **maintenance of viable populations of species in natural surroundings;**

Article 8(f) Rehabilitate and restore degraded ecosystems and **promote the recovery of threatened species,...**

Conservation initiatives

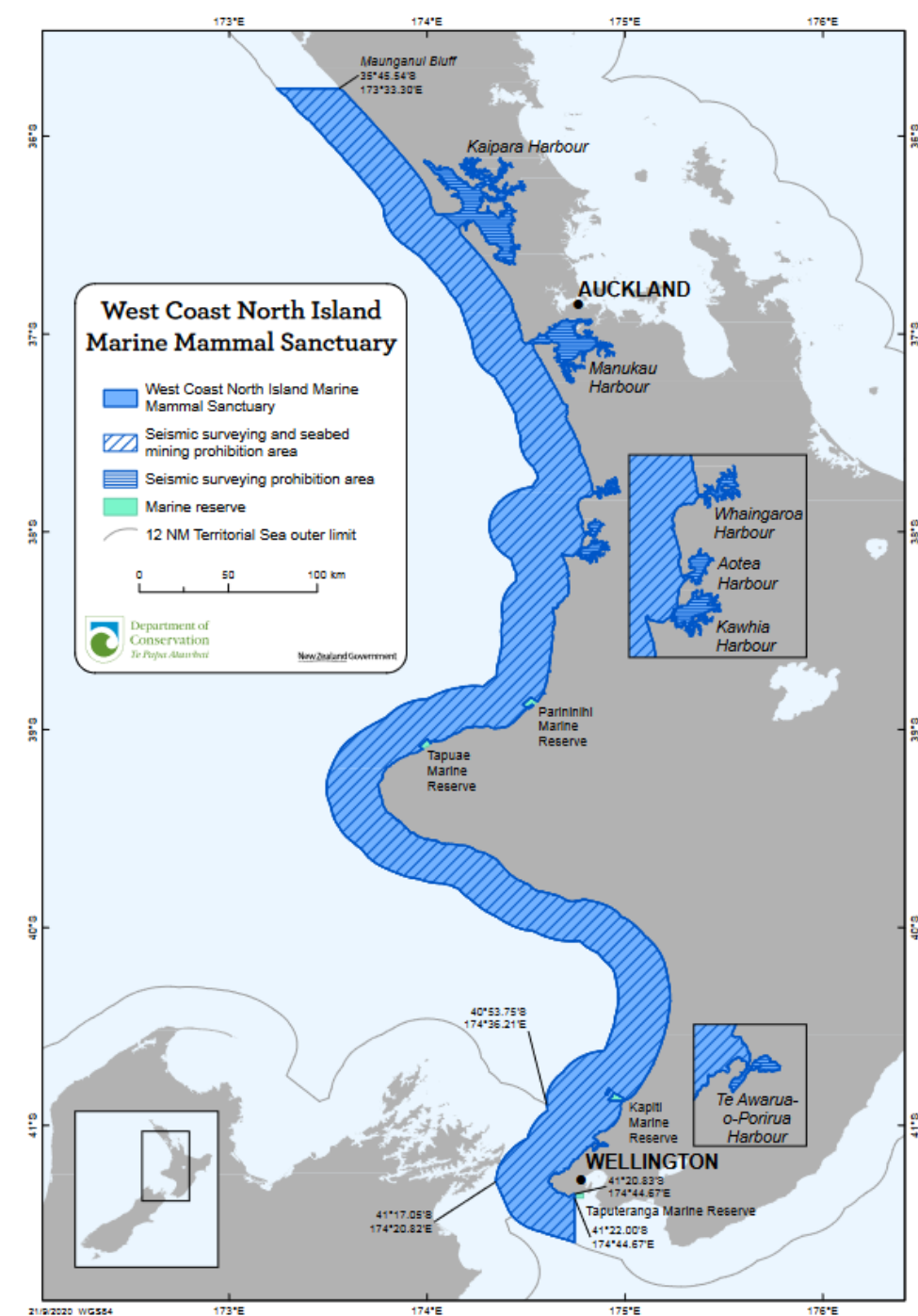
W coast N Isl. Marine Mammal Sanctuary -
offshore to 12 nm territorial sea boundary

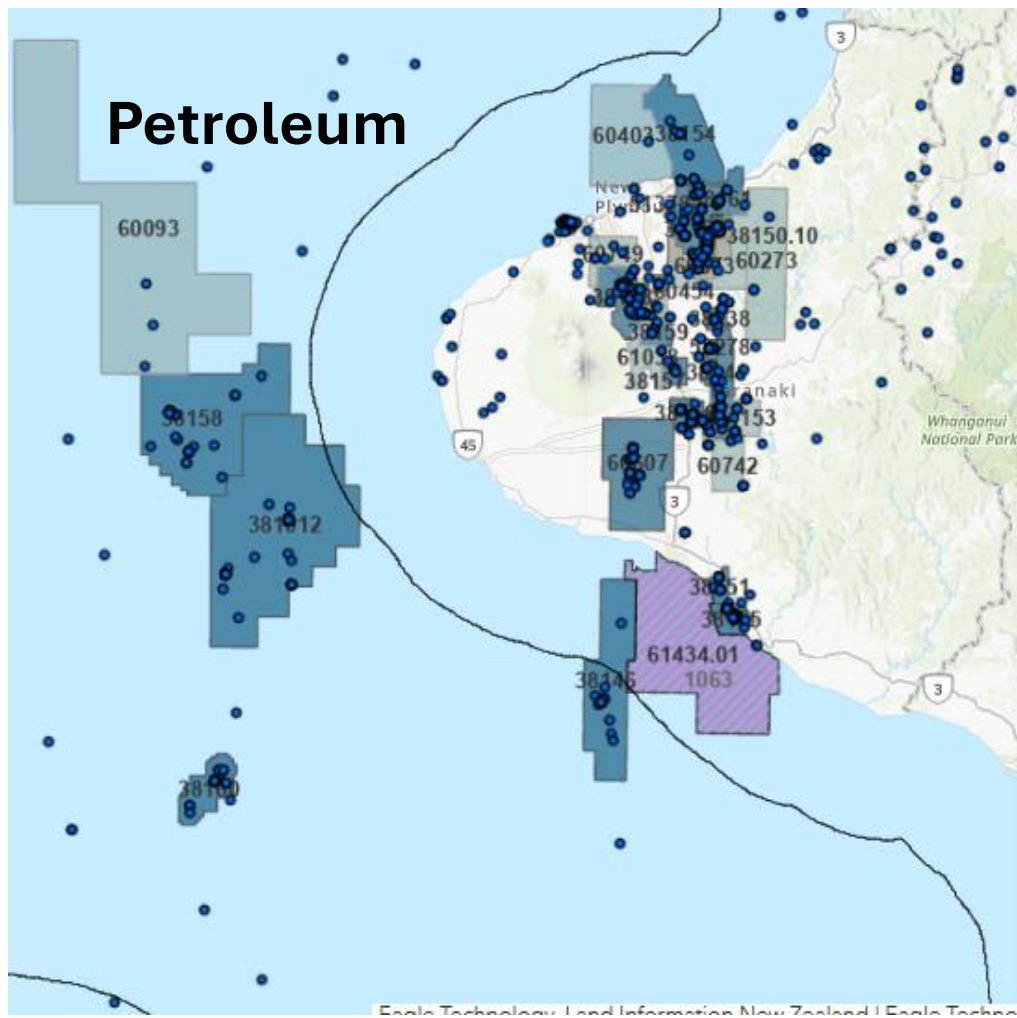
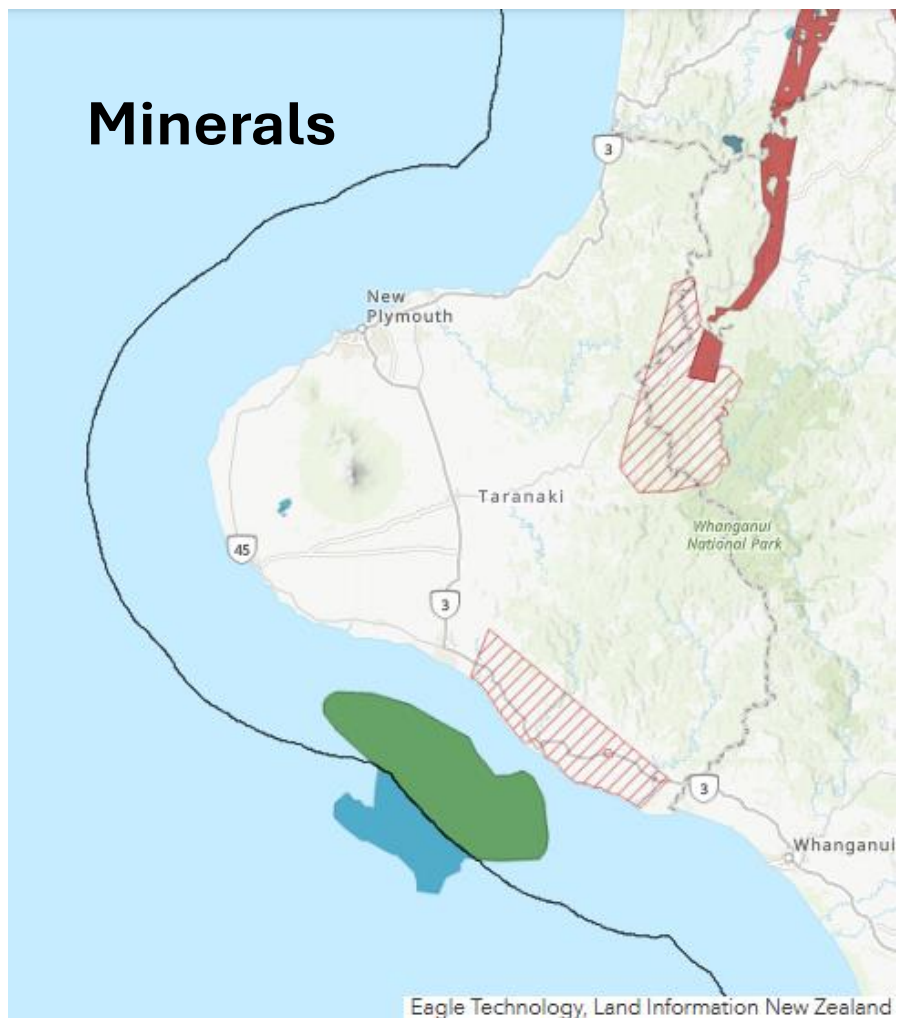
2020 Variations to the sanctuary

- extending the southern boundary
- **ban on seabed mining with an exemption for existing exploration and mining permits**
- ban on seismic surveying with exemptions...
- 'nationally significant activities' with approvals from Ministers of Conservation and Energy & Resources
- **Mining for petroleum is allowed** as per the original [notice in 2008](https://www.doc.govt.nz/nature/habitats/marine/other-marine-protection/west-coast-north-island/)

<https://www.doc.govt.nz/nature/habitats/marine/other-marine-protection/west-coast-north-island/>

TTRL proposal abuts Sanctuary, with demonstrable trans-boundary effects





TTRL exploration permit area 635sq.km.

TTRL mining permit 242.57sq.km.

Total 878sq.km.

<https://data.nzpam.govt.nz/permitwebmaps/?commodity=minerals>
(19/10/25)

EnZed Energy exploration permit (546sq.km.) accepted on 16/10/25

<https://data.nzpam.govt.nz/permitwebmaps/?commodity=petroleum> (19/10/25)

Conservation & sustainable use of our marine environment

How are we doing? *Status quo*:

- 91 % of indigenous seabirds
- 57 % of assessed marine invertebrates
- 35 % of marine mammals

Threatened or at risk of extinction

**6th Mass Extinction
gaining pace**





Credit:
 Lisa Burd /STUFF, 13 March 2024 (above);
 Ngāti Ruanui, 2 Oct 2024 (below)

The community does NOT want seabed mining
TTRL has NO social license to operate here

