Applicant Responses to Relevant Comments from Administering Authorities and Relevant Local Authorities on the Taranaki VTM Project

This document contains the key comments from the following parties:

> Department of Conservation (noting they are not an administering authority);
> EEZ Act Team;
> Taranaki Regional Council;
> Horowhenua District Council;
> South Taranaki District Council;
> Rangitikei District Council.
> Whanganui District Council;
> New Plymouth District Council;
> Horizons Regional Council;

Comments from Department of Conservation

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
1	DOC in commissioning an underwater acoustician (JASCO Applied Sciences (Australia) Pty Ltd), consider that the application does not adequately cover several potential impacts on marine mammals are not accounted for or adequately accounted for, TTR did not follow appropriate noise standards and methods in their assessment, proposed mitigation and minimization of effects is insufficient and monitoring conditions are inadequate.	Underwater Noise/Marine Mammals	**Response Evidence:** Evidence of Darran Humpheson (Acoustics) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025 Evidence of Dr Simon John Childerhouse (Marine Mammals) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025	Please refer to 'Evidence of Darran Humpheson (Acoustics) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025' Please refer to 'Evidence of Dr Simon John Childerhouse (Marine Mammals) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025'
2	DOC commissioned a review from an underwater acoustician with experience in marine mammals and seabirds. The findings of this peer review include that TTRL's modelling does not incorporate some of the potential sources of impact on marine mammals, that impacts on marine mammals will likely be greater than predicted, and the proposed mitigation and monitoring are insufficient to ensure marine mammals are protected from the activities. The authors consider that the TTRL application does not adequately cover the following: … Monitoring conditions are inadequate.	Conditions	**Substantive FTA Application:** Section 5.8-5.9 **Response Evidence:** Evidence of Darran Humpheson (Acoustics) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025 Evidence of Dr Simon John Childerhouse (Marine Mammals) on behalf of Trans-Tasman Resources Limited in	This recommendation is not agreed. As noted in (inter alia) paragraphs 3 to 5 and 7 to 9 of Dr Childerhouse's evidence with regard to the data relied on and proposed mitigations: > There is considerable baseline data on marine mammals within the South Taranaki Bight, enabling robust and accurate assessments; > The best available data has been used in the assessment of noise and it is not possible to collect in situ measurements; > Proposed condition 11 (relating to underwater noise) is a very active and forceful control on the amount of noise that can be generated by the activity. The 135 dB level referenced in condition 11 was carefully and deliberately set to minimise or eliminate significant biological impacts on marine mammals from noise. Therefore, TTR would be required to comply with the noise limits stated in the consent conditions. Those limits are set at appropriate thresholds to avoid adverse noise effects on marine mammals.

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			response to comments received 13 October 2025	Dr Humpheson provides a concluding statement in his evidence confirming that the underwater noise modelling relied on is robust, has been reviewed and updated and is consistent with international best practice. In his evidence, under the sub-heading "Monitoring best practice", Dr Humpheson recommends the addition of an Advice Note stating that all underwater noise measurements and associated compliance assessments required under conditions 11 to 18 must be undertaken in general accordance with internationally recognised best practice for underwater acoustic measurements, such as ISO 17208-3: 'Underwater acoustics — Quantities and procedures for description and measurement of underwater sound from ships — Part 3: Requirements for measurements in shallow water', or any subsequent revision. Condition 18 is amended to include this recommended Advice Note.

Comments from EEZ Act Team (s51 FTAA)

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1	The reliance on dated information raises questions about whether the application provides a sufficiently current understanding of potential environmental effects determining it useful for the Panel to consider whether the information provided is the best available in line with s61 of the EEZ Act.	Legal	N/A	TTR relies on the evidence of its technical experts who consider the information available is sufficient to properly inform their assessments of effects. The EPA has also accepted the application as complete.
2	The EEZ Team state that the applicant has not indicated within the main application which documents provide supporting evidence for statements or claims as currently it appears all material has been provide without guidance.	Administrative	**Footnote Index:** Footnote documents referenced FN24 to FN226	All material referenced in the footnotes to the FTA Application, including an index for ease of reference, was provided to the panel on 12.9.25.
3	Several application documents are in a draft state and contain unresolved elements, are 10 years old and contribute to uncertainty.	Siecap	N/A	While some documents are drafts and many are ~10 years old, they remain relevant because the underlying facts they cover (ore characteristics, process physics, equipment principles, test results etc.) have not changed. Where time-sensitive items have changed those have been verified and updated in the current application package.
4	Some technical reports include clear recommendations for the applicant particularly regarding operational methodology. For example, dewatering is discussed in the *Process Plant Review* (Page 216) specifically in relation to a desalination system – It is unclear to whether these recommendations are implemented and the consequences for the impact assessment.	Siecap	**Response Evidence:** Evidence of Shawn Thompson on behalf of Trans-Tasman Resources Limited in Response to Comments Received, 13 October 2025.	Paragraphs 22 to 24 of Mr Thompson's evidence responds to this comment and provides details about dewatering magnetic separators and reverse osmosis permeate from seawater. No amendments to the proposed conditions are recommended as a result.
5	The most up to date references should be used: for example when applying ANZECC guidelines, all parameters should be compared against the latest version.	Ecology, Sedimentation and Coastal Matters	N/A	All reports cited up to date literature at the time of submission to the client. Expert evidence provided at hearings cited new relevant publications.
6	In the application and expert evidence, references are made to documents that appear to have been used in the assessment of effects but were not included in the application package.	Administrative	**Footnote Index:** Footnote documents referenced FN24 to FN226	All material referenced in the footnotes to the FTA Application, including an index for ease of reference, was provided to the panel on 12.9.25.
7	Some files appear to be duplicated and the applicant includes some files with the same name – ideally the applicant would ensure only a final	Administrative	**Footnote Index:** Footnote documents referenced FN24 to FN226	All material referenced in the footnotes to the FTA Application, including an index for ease of reference, was provided to the panel on 12.9.25.

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	version of each document exist indicating its purpose and maintenance to the main document.			
8	Provide greater clarity around the process of washing the iron ore concentrate to reach levels below 350 ppm in relation t: > The expected chloride content of the discharge; > Whether chlorides are released into the marine environment or managed onboard; > Any pre-treatment or separation process prior to discharging used water; and > Potential environmental effects of residual chloride discharge.	Desalination	**Response Evidence:** 'Evidence of Shawn Thompson (Technical and Operational) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025'	Please refer to 'Evidence of Shawn Thompson (Technical and Operational) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025'
9	The application does not consider brine modelling. The Panel should consider requiring modelling the interaction of the brine plume with local currents, tides and seasonal conditions to predict dispersion and potential impacts on benthic and pelagic habitats. An assessment of whether the brine could settle on the seabed and affect sensitive habitats such as sand or rocky reefs.	Ecology, Sedimentation and Coastal Matters	**Additional Information:** Yolanda Fernández-Torquemada, Adoración Carratalá, José Luis Sánchez Lizaso (2019). Impact of brine on the marine environment and how it can be reduced. Desalination and Water Treatment 167, 27-37.	Fernández-Torquemada et al. (2019) recently reviewed the impact of brine from desalination plants on the marine environment and how it can be reduced. They noted that negative environmental impacts of brine discharge from a desalination plant can be minimized by appropriate planning and that frequent environmental monitoring programs of desalination plants normally show that the impacts are small, localized, and unimportant. However, significant effects have been detected in some cases. In these cases, effects can be mitigated by introducing devices that increase the mixing of effluent and surrounding seawater (e.g. high pressure/velocity diffusers) or/and by diluting the saline with seawater before discharge. Ecological impacts of the saline plume from the IMV will be minimised by: > Pre-mixing the reverse osmosis (RO) permeate concentrate into the slurry thereby reducing brine strength down to ~1.1–1.3 times× that of seawater before discharge. > The momentum and buoyancy differential of the discharge driving the rapid near-field entrainment needed to return to near-ambient salinity very quickly. > The IMV saline discharge point slowly traversing the 44 km2 mining area over 20 years of operations so that no one point will be continuously exposed to the saline discharge.; > The receiving environment being very exposed and subject to frequent moderate to strong winds, rough seas and strong currents thereby maximising mixing of the brine and minimising the size of the mixing zone. > Receiving environments in the immediate vicinity of the saline discharge dominated by short-lived, fast growing planktonic and benthic invertebrate species. > Fish, as osmoregulators can adjust their internal osmotic concentration, are much less sensitive to changes in salinity, and can move away from brine plume.
10	The Expert Panel may consider requesting that the applicant provide clear measures for periodic membrane cleaning to prevent accidental brine or chemical release. Other maintenance and waste management measures are briefly touched on such as onboard substances for vessels and machinery maintenance, hull cleaning and antifouling measures and waste management for the Anchor Handling Vessel.	Operations/Processes (discharges/biosecurity)	**Response Evidence:** 'Evidence of Shawn Thompson (Technical and Operational) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025'	Please refer to 'Evidence of Shawn Thompson (Technical and Operational) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025'
11	The cumulative effects assessment is limited in scope, focusing mainly on suspended sediment and visibility with no cumulative effects assessment of the proposed activities and set net fishers. Broadly, assumptions regarding effects, consequences and recovery have been considered in	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'

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	isolation rather than combined and cumulative impacts across ecological receptors.		Resources Limited in response to comments received 13 October 2025	
12	A number of supporting sub-activities that are expected to occur routinely and on a daily or periodic basis such as vessel maintenance, hull cleaning and the use of chemicals in the reverse osmosis desalination system are not fully described and introduces a degree of uncertainty into the overall assessment of environmental effects and understanding of cumulative effects and adequacy of proposed mitigation measures.	Ecology, Sedimentation and Coastal Matters	**Substantive FTA Application:** Section 5	Small and intermittent activities or spill incidents have not been included in the ecosystem impact assessment as they are adequately managed/mitigated by standard operating procedures designed to minimise or prevent harm. The scope of routine and preventative maintenance activities undertaken onboard the vessel, covering both ship systems and the integrated processing plant, will be broad, varied, and continuous. These activities encompass mechanical, electrical, hydraulic, and control systems across propulsion, auxiliary equipment, and process systems, as well as safety, environmental, and habitability functions. Given the complexity of a production vessel and the interdependency of its systems, it is neither practical nor meaningful to provide an exhaustive list of all maintenance tasks. Instead, maintenance activities will follow established marine engineering and class requirements, vessel-specific planned maintenance schedules, and OEM service recommendations. All maintenance and inspection activities shall comply with the applicable American Bureau of Shipping (**ABS**) Rules and Regulations, including those governing shipboard machinery, electrical systems, and process plant installations, as well as relevant flag state and Maritime NZ requirements. https://ww2.eagle.org/en/rules-and-resources/rules-and-guides-v2.html
13	The assessment submitted includes some consideration of sensitive environments drawing on NIWA surveys conducted in 2013 and predictive modelling of reef associated taxa. While this is a useful baseline, the analysis appears limited in scope and does not incorporate more recent scientific findings such as the identification of sponge gardens and other sensitive environments. The applicants statement that no rare or vulnerable habitats are present, this is based off dated and generalised habitat descriptions and is unclear to what extent predictive models have been applied to evaluate the presence of sensitive environments not detected in earlier surveys.	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'
14	Section 59(2)(e) of the EEZ Act requires decision makers to take into account the importance of protection rare and vulnerable ecosystems.	Legal	N/A	This is one of the matters to be taken into account under the FTAA framework.
15	Panel may be minded to seek more thorough description or evaluation of potential effects to ensure all rare and vulnerable ecosystems are adequately identified and considered in the decision-making process. This can be achieved through updated data, clarification of predictive modelling and consideration of cumulative or indirect effects.	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'
16	Uncertainty remains around populations recovery once rehabilitation begins but there is limited clarity around how long recovery may take or the environmental footprint of the operations. Key species highlighted in the application (salps and copepods) are abundant, ecologically important and sensitive to change – if recovery is prolonged the populations may struggle to rebound increasing risk of ecological change or tipping points.	Ecology, Sedimentation and Coastal Matters	**Response Evidence:** 'Evidence of Dr Alison MacDiarmid (Marine Ecology) on behalf of Trans-Tasman Resources Limited in response	Refer to 'Evidence of Dr Alison MacDiarmid (Marine Ecology) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025'

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17	Application would benefit if it provided specific alternative methods that were considered to avoid or remedy environmental effects before arriving at mitigation measures.	Legal	**Substantive FTA Application:** Sections 2.4	An assessment of alternatives in accordance with the requirements of the legislation is included in the application.
18	The application contains inconsistencies and would benefit from clarity around the use and management of chemicals – in some parts the applicant states no chemicals will be used but elsewhere there is reference to chemicals in the reverse osmosis desalination process potentially affecting the assessment of human health effects.	Operations/Processes (Hazardous Substances)	**Response Evidence:** Evidence of Shawn Thompson on behalf of Trans-Tasman Resources Limited in Response to Comments Received, 13 October 2025.	Please refer to 'Evidence of Shawn Thompson (Technical and Operational) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025'
19	To avoid misrepresentation and underestimation of human health risk the following information could be provided by the applicant: > Complete list of chemicals to be used in reverse osmosis; > Handling, containment and spill response protocols for those chemicals where vessel based operations present risk of accidental discharge; and > A clear statement that although chemicals may be used they will be fully managed on board and not disposed of to the marine environment.	Operations/Processes (Hazardous Substances)	**Substantive FTA Application:** Sections 2.3.6 and 5.14.3 **Attachment 1:** Proposed Marine Consent Conditions 33-34 **Response Evidence:** Evidence of Shawn Thompson on behalf of Trans-Tasman Resources Limited in Response to Comments Received, 13 October 2025.	This recommendation is not agreed. As discussed in responses to similar comments from Taranaki and Horizons regional councils, proposed conditions 33 and 34 appropriately address oil or fuel spills. Responses to unplanned oil or fuel discharges are regulated by the Maritime Transport Act 1994 and the likelihood of unplanned oil spills can be best minimised through effective management and operational controls. To that end, TTR will prepare a comprehensive Spill Contingency Plan as required by, and in consultation with, Maritime New Zealand. This represents industry best practice, will address the risks of unplanned oil spills and set out the measures to reduce the oil spill ecological risk levels to as low as reasonably practicable. Proposed condition 34 expressly requires the oil spill contingency plans prepared in accordance with Parts 130A and 131 of the Marine Protection Rules to be implemented if a spill occurs. In that event, the Consent Holder must implement all necessary operational responses to ensure adverse effects are remedied or mitigated. The Advice Note to condition 34 reiterates compliance requirements, stating "Parts 130A and 130 of the Marine Protection Rules require oil spill contingency plans to be approved by MNZ for ships and installations". Furthermore, TTR is not applying for consent to authorise any disposal, or discharges of harmful substances at sea. All hazardous and/or oily waste shall be stored on board each project vessel and transported to a shore side facility that is authorised to accept such material. Mr Thompson's evidence for TTR comments (at paragraphs 34 to 42) on the use and management of chemicals related to the reverse osmosis desalination process. This includes a summary of the regulatory controls that apply, the typical approaches to control/management of chemicals onboard, requirements for the reception of harmful substances onshore and other details. Mr Thompson's evidence confirms the comprehensive nature of the regulator
20	There is uncertainty around how (*Shoreline Stability along the South Taranaki Bight* – Page 55 South Taranaki Bight Factual Baseline Environmental Report – – NIWA updated 2015; *Coastal stability in the South Taranaki Bight - Phase 1 Historical and present day shoreline change* – NIWA updated 2015; *Coastal stability in the South Taranaki Bight - Phase 2 Potential effects of offshore sand extraction on physical drivers and coastal stability* – NIWA updated 2015) addresses the proposed offshore extraction and how it may contribute to or exacerbate shoreline erosion and accretion.	Ecology, Sedimentation and Coastal Matters	**Supplementary Technical Package:** 6P	Report 6 – NIWA Coastal Stability Phase 2 Report – FINAL - assessed shoreline stability in the South Taranaki Bight to determine whether offshore iron sand extraction would impact nearshore coastal processes. Using a combination of field measurements, numerical modelling, and empirical analysis, the report examined beach morphology, sediment transport, wave dynamics, and the fate of seabed modifications. It found that the beaches are naturally dynamic, with sediment highly mobile and subject to frequent erosion and accretion cycles. Modelling showed that changes in wave height, direction, and sediment transport caused by seabed pits and mounds were minor and well within the range of natural variability, which means the proposed offshore extraction is unlikely to cause measurable changes to

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				coastal processes or shoreline stability. The extraction site was found to be largely disconnected from the nearshore sediment system, and any changes would be negligible compared to the natural variability already observed along the coast. Pre-extraction surveys as part of the Operational Assessment Report ("**OAR**") (proposed Condition 87) that would be developed annually,will identify any significant seabed features to ensure that redeposition activities are managed, within operational limits, to maintain the natural form and integrity of the seabed environment without contributing to coastal stability concerns. Also Conditions 103 -105 requires TTR to report (quarterly and annually) on: Bathymetry; Average and maximum depth, and position of any unfilled pits remaining after completion of a mining lane (from bathymetry); Average and maximum height, and position of any mounds created during the redeposition of de-ored sediment (from bathymetry) all of which will require a baseline measurement that will inform both the mining and redeposition of sediment.
21	The application could benefit from a more comprehensive consideration of alternatives as it assumes the proposed approach is necessary with little exploration of other extraction techniques, sediment disposal methods or lower impact locations.	Legal	**Substantive FTA Application:** Sections 2.4	An assessment of alternatives in accordance with the requirements of the legislation is included in the application.
22	The application largely focuses on mitigation, with limited discussion of avoidance or remedy with no comparative analysis or explanation is provided. A more transparent discussion of alternatives would impact confidence in the proposed approach and the robustness of the effects management.	Legal	**Substantive FTA Application:** Sections 2.4	*An assessment of alternatives in accordance with the requirements of the legislation is included in the application.*
23	Reserves right to make recommendation on grant or decline of the application until all information is available, conditions set and the test set down by the Supreme Court worked through.	Legal	N/A	The material harm test set down Supreme Court is the correct test for applying s10(1)(b) of the EEZ Act, and that section is one of the matters to be taken into account for this application. However, under the FTAA framework that does not determine whether the application may be declined.

Comments from Taranaki Regional Council

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1	Effects that breach bottom lines should be given greater weight than effects which do not	Legal	N/A	This is not provided for in the FTAA and there is no statutory direction requiring or enabling this.
2	Council concurs that there will be gross economic benefits to the region but cannot reach a judgement on if there would be significant net economic benefits. Clarification is sought on estimates of jobs that will be taken by people who live in Taranaki/Whanganui including how they arrived at such figures and estimated benefit to South Taranaki. It is also sought for the requirement of a head office to be located in Taranaki as a consent condition and further consideration of potential economic implications on fisheries, tourism, recreation and human health.	Economic	**Substantive FTA Application:** Executive Summary and Section 1.4 **Attachment 1:** Proposed Marine Consent Conditions 81-85. **Response Evidence:** Leung, C. and Huang, T. (2025). Joint Statement of Evidence of Christina Leung and Ting Huang (Economics) on behalf of Trans Tasman Resources	This recommendation for the head office to be located in Taranaki is not agreed for the reasons given in response to similar recommendations by the New Plymouth and South Taranaki district councils. > TTR intends to base its head office in New Plymouth (i.e. in the Taranaki region), subject to business decisions and staff availability. Therefore, TTR does not agree to a consent condition mandating the head office location. > TTR will provide a training facility and helicopter logistics base (for personnel and supplies transfers to the offshore vessels) in Hāwera i.e., in the Taranaki region. Condition 84 is amended to refer to the establishment of the helicopter logistics base in addition to the training facility. > The project's geotechnical and environmental monitoring facility will be at the Port of Whanganui (condition 85).

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			Limited in Response to Comments Received, 13 October 2025, 14-22 p. **Attachment 2**: NZIER economic impact assessment. **Substantive FTA Application:** Executive Summary and Section 5.2.34 and 5.2.3.5.	> The project website (required by condition 81) will be an accessible information resource supplemented by the bi-annual community meetings required by condition 82. Section 1.4 of the Substantive Application report notes that TTR is committed to focusing on sourcing services, supplies and people from the local community where possible, and is aiming for at least 80% of staff to be based within, or near, the Taranaki and Whanganui Regions. TTR is already in discussions with the local community in relation to engineering and maintenance services for the project. We acknowledge the opposition from iwi. Refer to NZIER's Evidence Statement (Appendix J) paras 14 to 22 on the scope and approach of NZIER's EIA. Also refer to paras 35 to 53 of the evidence statement on how NZIER has addressed issues raised around the net economic benefits of the project, including additional analysis. Regarding clarification on the estimated impact on employment, the 1,123 figure in Table 11 on page 13 of the NZIER EIA report includes the additional jobs in the region directly involved in the project's operation (i.e. direct), the additional jobs in the supporting industries in the region (i.e. indirect) and additional jobs created in the region as a result of people working in the supporting industries increasing their consumption given increased earnings (i.e. induced). The 799 jobs figure in section 8.3.4 of the TTRL's Impact Assessment refers to the estimated additional direct and indirect jobs created in the region. That is, the additional employment in the region directly involved in the project's operation and the additional employment in the region's supporting industries. We noted the difference in the share of the project's direct employment in the region between section 5.2.3.4 and section 5.2.3.5 of the TTRL's Impact Assessment. The description of where the direct employment will be in section 5.2.3.5 is based on the social impact assessment undertaken in 2016. This has been revised for TTRL's current proposal, and the NZIER EIA draws on the TTRL's revised planned direct employment. We have passed this on to the TTRL team and they will make sure there is consistency.
3	Council recommends that the Expert Panel address the following matters in regard to impacts on reef ecosystems: > Gaps in assessment regarding known reef locations and associated biota; > Uncertainty regarding other potential reef locations; and > Uncertainty in the sediment plume modelling approach	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 'Evidence of Charine Collins (Sediment Plume) 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' and Refer to 'Evidence of Charine Collins (Sediment Plume) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025'. The plume model calculates and figures display (to the edge of the modelled area) depositional thickness to fractions of a mm which have no ecological impact and can be safely ignored.
4	Give close consideration to the knowledge gaps with regards to seabirds, 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.	Seabirds	**Attachment 1**: **Proposed Marine Consent Conditions:** 47 - 48	The two-year, pre-commencement environmental monitoring plan (see conditions 47-48) will include a systematic and structured seabird survey covering the proposed project area (PPA) and beyond. The survey will be temporally resolved enabling seabird abundance within the PPA to be determined on a seasonal basis. This survey will address existing knowledge gaps around the utilisation of the PPA by seabirds.

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5	Give close consideration to the knowledge gaps with regards to 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.	Marine Mammals	**Supplementary Technical Package:** 4c, 4b, 24 **Attachment 1: Proposed Marine Consent Conditions**: 11,12, 35, 36, 47-51, 54, 55 and 66	TTR undertook dedicated aerial surveys for marine mammals inside and outside the mining area every 2-3 months for over two years covering over 8,400 km of transects (Cawthorn 2015) and have undertaken highly detailed risk assessment based on the best available data. Evidence by Dr Childerhouse (2023, 2024) and the Application (2025) summarised the significant amount of data available on marine mammals within the STB. Based on these data, Childerhouse (2024) concluded that the best available information presently before the decision makers is sufficient to form a reasonable conclusion about the likely impact of this project. Furthermore, TTRL have proposed two years of detailed research on marine mammals prior to the start of any operations within the region. This information would complement the existing, available data and provide additional data useful in confirming the lack of impacts from the project. With respect to uncertainty with the available data, Dr Childerhouse notes (2024, para 10) that there is sufficient data upon which to make robust and accurate assessments with respect to marine mammals. Where the best available information includes gaps or uncertainty, it is still possible to proceed in making sensible judgements while accounting for uncertainty and implementing a precautionary approach if required. Finally, TTRL have provided Consent Conditions to protect marine mammals, including killer whales, from any potential impacts of the activity. These include Condition 11 which sets a maximum allowable level of underwater noise from the operation and Condition 66 which is the development of a Marine Mammal Management Plan which will outline the mitigation requirements for the project.
7	Requests provision of additional air quality emissions modelling and environmental effects analysis, and requests additional scrutiny of air discharges. Specifically, whether the FPSO air quality monitoring refers to emissions from the IMV or from the FSO, air quality emissions dispersion modelling incorporating cumulative effects from the IMV, FSO and the CEV, resolution of application discrepancy regarding annual consumption of HFO by the IMV, provide modelling and effects analysis of impingement and deposition of gas condensation aerosols and plume in the vicinity of the IMV, FSO and CEV and consider if requirements under MARPOL Annex VI apply regarding limitations on sulphur content.	Air Quality	**Substantive FTA Application:** Sections 4.1.3 and 5.1.2 **Supplementary Technical Package:** 21 & 22	As per Section 4.1.3 of the substantive FTA application, air discharges are a matter which is not regulated under the EEZ Act. Although the effects of these activities are required to be considered under section 59 of the EEZ Act, an assessment of these effects is not required to form part of any impact assessment for a marine consent application. To ensure that a comprehensive approach has been undertaken when considering the project, an assessment of the effects on air quality has been undertaken by Tonkin and Taylor (2013a, 2013b) as described in Section 5.12 of the substantive FTA application. The assessment is considered robust and sufficient for the Expert Panel to take into account the discharge to air effects.
8	The Panel should consider whether it is acceptable for the Applicant to use HFO of 3.5% and if not to consider: > Requiring the applicant to use HFO of a maximum 0.5% sulphur content; > Requiring the use of only diesel fuel; > Imposing a cap on annual emissions of sulphur dioxide and allowing the Applicant to manage fuel consumption within that cap; > Requiring the installation of approved sulphur dioxide scrubbers on engine exhausts; and > Require continual ocean neutralisation dosing equivalent to acid gas emissions.	Siecap (Heavy Fuel Oil)	**Attachment 3a:** Siecap Taranaki VTM Project Pre-Feasibility Study Offshore Iron Sands Project 25 March 2025_Part 1 **Attachment 3b:** Siecap Taranaki VTM Project Pre-Feasibility Study Offshore Iron Sands Project 25 March 2025_Part 2	This recommendation is not agreed with: i) The Applicant will comply with the latest IMO (**MARPOL**), Maritime NZ and ABS Class society requirements. Since 1 Jan 2020, MARPOL Annex VI caps fuel sulphur at 0.50% mass by mass globally (and 0.10% inside SOx Emission Control Areas i.e. ECAs). There are no designated Emission Control Areas (ECAs) in New Zealand at present. New Zealand has implemented Annex VI via Marine Protection Rules Part 199, which mirrors those limits and enforcement. https://www.maritimenz.govt.nz/media/spohmhjo/part199-marine-protection-rule.pdf ABS recognises two lawful pathways: (a) use compliant low-sulphur fuel; or (b) install/operate an Exhaust Gas Cleaning System, commonly called a "SO_2 scrubber" as approved/verified to IMO guidelines

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				ii) The use of 0.50% sulphur Very Low Sulphur Fuel Oil (**VLSFO**) already fully satisfies the IMO 2020 and Maritime NZ emission requirements. Mandating diesel (**MGO/MDO**) would therefore exceed the regulatory standard and function primarily as a commercially punitive condition, rather than an environmental compliance necessity, although it could marginally simplify operational oversight and slightly reduce particulate emissions. iii) The request for 'Imposing an annual SO_2 mass-emission cap and let the Applicant manage fuel use' will not be sufficient on its own to meet the law. A stand-alone SO_2 cap cannot substitute for Annex VI/Part 199 compliance. iv) Require installation of approved SO_2 scrubbers on engine exhausts See point (i) above v) Require continual ocean neutralisation dosing equivalent to acid gas emissions is not an IMO-recognised compliance method. There is no provision for "neutralising" SOx by adding alkalinity directly to the sea as a substitute. Imposing such dosing would conflict with the Annex VI framework and could raise separate discharge/pollution issues.
9 & 10	To provide acceptable ecological protection against the possibility of metals within sediment proving to be at a toxic level, the criteria referenced should be the DGV criteria provided in Table 1 of the 2018 Guidelines (Toxicant default guideline values for sediment quality) and not the GV-high criteria to protect aquatic organisms as the upper guidelines values should only be an indicator for potential high-level toxicity. TRC recommends that draft Condition 6 is amended to reference the 'the Australian and New Zealand Guidelines for Fresh and Marine Water Quality 2018 ("**ANZECC 2018**") and not the 2000 guidelines and delete reference to 'ISQG-High' values in the ANZECC 2000 guidelines and instead require compliance with the DGV criteria in ANZECC 2018 guidelines.	Ecology, Sedimentation and Coastal Processes	**Supplementary Technical Package:** 41 **Footnote Index:** FN27	The reference ISQG-low and ISQG-high values contaminants in sediments listed in Table 5 in Vopel et al. (2013) are the same values a listed as the DGVs and GV-highs in ANZG (2018) "Australian and New Zealand Guidelines for Fresh and Marine Water Quality. Australian and New Zealand Governments and Australian state and territory governments, Canberra ACT, Australia" (see https://www.waterquality.gov.au/anz-guidelines/guideline-values/default/sediment-quality-toxicants).
11	TRC recommends the Panel require analysis and an appropriate protocol required for vessel safety and operational procedures, clarification of oil spill modelling assumptions, and confirmation of both public liability and professional indemnity insurance coverage.	Siecap (Maritime Safety, Oil Spill Contingency)	**Substantive Application:** Section 5.13.6.4 & 8.3.19 **Attachment 1:** Proposed Marine Consent Conditions: 67 &107	This recommendation is not agreed because the matters identified are already addressed by proposed condition 67, which requires the preparation of a Collision (Loss of Position) Contingency Management Plan ("CCMP"). Of note the CCMP must include: > At sub-clause (b):The processes, methods, procedures and responses to be implemented after any unplanned / emergency event that potentially results in mooring failure or loss of position; > At sub-clause (k): The detailed emergency response procedure (including communication requirements and notification periods) addressing incidents such as mooring leg failure, loss of heading control, thruster drive off, and disablement of thruster system. The response must address the risk of collision between the Consent Holder's assets and the Kupe assets to ensure the risk is 'As Low As Reasonably Practicable'. Condition 67 also requires that the CCMP is to be: > Prepared by a SQEP; > Peer reviewed by an independent SQEP; and > Certified by the EPA.

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				Regarding liability, This recommendation is not agreed. The level and nature of insurance requirements set by conditions 107 and 108 is appropriate. The purpose of the insurance (to cover costs of environmental restoration and damage to the assets of existing interests) is clearly stated in condition 107.
12	TRC seek to amend Conditions 33 and 34 to require Maritime NZ approval of the oil spill contingency plan prior to extraction commencement and require consultation by the applicant with representatives of the Taranaki marine oil spill response team and the Manawatu-Wanganui marine oil response team in preparation of this plan. It is sought that consideration be given to New Zealand's capacity to respond to large-scale oil spill incident and if gaps exist, address them through consent conditions.	Siecap (Maritime Safety, Oil Spill Contingency)	**Substantive FTA Application:** Section 5.4.13 **Attachment 1**: Proposed Marine Consent Conditions 33 & 34	This recommendation is not agreed. As discussed in responses to similar comments from Horizons Regional Council and the Environmental Protection Authority, proposed conditions 33 and 34 appropriately address oil or fuel spills. TTR is not seeking consent to authorise any disposal, or discharges of harmful substances at sea. All hazardous and/or oily waste shall be stored on board each project vessel and transported to a shore side facility that is authorised to accept such material. Responses to unplanned oil or fuel discharges are regulated by the Maritime Transport Act 1994 and the likelihood of unplanned oil spills can be best minimised through effective management and operational controls. To that end, TTR will prepare a comprehensive Spill Contingency Plan as required by, and in consultation with, Maritime New Zealand. This represents industry best practice, will address the risks of unplanned oil spills and set out the measures to reduce the oil spill ecological risk levels to as low as reasonably practicable. Proposed condition 34 expressly requires the oil spill contingency plans prepared in accordance with Parts 130A and 131 of the Marine Protection Rules to be implemented if a spill occurs. In that event, the Consent Holder must implement all necessary operational responses to ensure adverse effects are remedied or mitigated. The Advice Note to condition 34 reiterates compliance requirements, stating "Parts 130A and 130 of the Marine Protection Rules require oil spill contingency plans to be approved by MNZ for ships and installations".
13	TRC recommends that the Panel review the certainty, integrity, geographic coverage and term of the current assurances and consent conditions concerning the intention and capacity of the Applicant to ensure post-extraction recovery of the wider marine environment and impose such additional measures, mechanisms and criteria.	Ecology, Sedimentation and Coastal Processes	**Substantive FTA Application:** Sections 5.5.2, 5.5.3 & 5.5.4 **Attachment 1**: Proposed Marine Consent Conditions 8, 57-58, 107 & 108	This recommendation is not agreed. As noted earlier in this table in response to the EPA's comments regarding insurances, the level and nature of insurance requirements set by conditions 107 and 108 is appropriate. The purpose of the insurance (to cover costs of environmental restoration and damage to the assets of existing interests) is clearly stated in condition 107. Conditions 8, 57 and 58 provide a framework within which the recovery of the benthic environment must be monitored via the Post-extraction Monitoring Plan, and accountabilities are set for the Applicant to explain to the EPA how recovery of the macroinfauna benthic community will be managed to ensure recovery occurs within 5 years after the completion of extraction activities. Dr MacDiarmid's evidence discusses environmental recovery under the sub-heading "Impact on and recovery of seafloor communities in the mining area". The evidence notes that given the composition of benthic communities in the project area, and inferences drawn from studies undertaken elsewhere, it is likely that seabed recovery will proceed post-disturbance over a period of several months to several years. This is within the timeframes anticipated by the consent conditions.
14	TRC recommend progressive payments into a trust fund (during mining operations) to be accessible once need is fund once extraction ceases (and any residual to be returned to the Applicant) at the end of the five-year reinstatement. It is also suggested that the EPA should be recognised as a co-beneficiary for the purpose of environmental reinstatement cost recovery,	Consent Conditions	**Attachment 1**: Proposed Marine Consent Conditions 8, 57-58, 107 & 108	TTR does not support the recommendations by TRC regarding liability and post extraction monitoring as: The post-extraction benthic recovery monitoring approach (Condition 8 and 57-58) to has been developed by ESNZ (formerly NIWA) and is deemed to be the appropriate mechanism through which to manage and monitor recovery.

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	public liability cover for the full five year period following cessation of extraction to be certified prior to cessation and a bond (despite the applicants objections).			The process provided for in Condition 8, which focuses on 'within two (2) km of the location where extraction has first occurred', ground truths the recovery for the seabed within the mining area by focusing on recovery within a discreet location. Following the completion of mining activities, the wider recovery is then addressed by the requirement to develop, by a Suitably Qualified and Experienced Person (SQEP), the Post- extraction Monitoring Plan (PEMP). The PEMP is reviewed by the Technical Review Group (TRG) (developed under Condition 60) and then certified by the EPA. This 'develop, review and certify' process is sufficiently robust to ensure that any concerns that may be had over the adequacy of the PEMP are addressed through the process. As a backstop, the proposal provides for environmental reinstatement cost recovery, through its public liability insurance (Condition 107) of $500,000,000 for 'for any one claim or series of claims from giving effect to these consents to cover costs of environmental restoration and damage to the assets of existing interests (including any environmental restoration as a result of damage to those assets), required as a result of an unplanned event occurring during the exercise of these consents'
15	TRC supports an accidental discovery condition for the discovery of archaeological sites, human remains (koiwi), or artefacts.	Consent Conditions	**Attachment 1**: **Proposed Marine Consent Conditions:** 19 **Substantive FTA Application:** Section 8.3.6.7	This recommendation is agreed. Condition 19 has been amended to add a standalone sub-clause referring to "human remains". A discovery of human remains would then be subject to the procedural requirements in conditions 20 – 23.
16	TRC recommends a condition requiring the development of a protocol for the operator to implement in case of declaration of a rahui in the general vicinity of extraction operations.	Consent Conditions	**Substantive FTA Application:** Section 8.2.11	This recommendation is not agreed because: > a rahui can be declared irrespective of consent conditions; > there is no certainty as to the "general vicinity of extraction operations"; and > the recommended condition would provide opportunities for project opponents to pursue rahui as a method to engage the consent condition and thereby constrain TTRs operations - regardless of (a) TTR's compliance with the comprehensive and strict conditions framework and/or (b) the interactions (if any) between TTRs operations and the cause and site of the rahui.
17	TRC note that it considers it currently has insufficient information to make a judgement on if the application is consistent with the nature and effect of the RMA and Taranaki Coastal Plan. It is noted that policies 9,15 and (possibly) 43 in the Taranaki Coastal Plan establish relevant bottom lines that should be given close consideration, while the requirement to take a precautionary approach in Policy 3 could also be contravened.	Legal	N/A	RMA provisions and Coastal Plan provisions do not operate as environmental bottom lines under the FTAA framework. Inconsistency with any such provisions may be a matter to be taken into account, but it cannot be elevated to a 'bottom line' status, and cannot be determinative of the outcome of the proportionality test in s 85(3).
18	Regarding uncertainty, the significant information deficiencies for adverse effects on marine mammals, seabirds, and the effects of the sediment plume identified by the Supreme Court in the 2016 application remain highly relevant. The limited work done by the Applicant since that Supreme Court decision has done little to address these gaps.	Planning	**Substantive FTA Application:** Sections 3.3.4, 5.5 & 5.7	Further work addressing uncertainty of effects on marine mammals, seabirds, and the effects of the sediment plume (as directed by the Supreme Court on the 2016 application) has been undertaken and incorporated into the application documents as detailed in paragraph 27 of the Memorandum of Counsel for Trans-Tasman Resources in Response to Panel Convener Directions dated 4 August 2025.

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19	Resolving if the adverse effects are sufficiently out of proportion or not will hinge on how the Expert Panel takes into account the requirement to favour caution and environmental protection. As the FTAA, necessitates a judgement on the extent of adverse effects, even in the face of considerable uncertainty. Caucusing is required among technical experts to determine what the plausible worst-case is in the context of seabirds, marine mammals and the sediment plume to inform analysis against statutory criteria (RMA and Taranaki Coastal Plan (2022)).	Legal	N/A	TTR's evidence is that a plausible worst case scenario has been used for modelling the sediment plume. The requirement to favour caution and environmental protection cannot be used to amplify the assessed adverse environmental effects in the proportionality test.
20	Council recommends the Expert Panel: Note that Council is supportive of being represented on the proposed Technical Review Group if the consent is granted.	Planning	**Substantive FTA Application:** Section 6.2	The Regional Council's support for its position on the Technical Reference Group is acknowledged.

Comments from Horowhenua District Council

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
1	HDC understand that Taranaki Regional Council are of the view that the 'worst case scenario' is the one that should be adopted. This indicates plumes could reach as far as Horowhenua – in which HDC are interested in the potential impacts on the Horowhenua community, its coastal environment and species (but do not have the technical capacity) to undertake careful assessment but welcome the opportunity to continue being involved in the process related to these matters. They are of the opinion that TTR should mitigate any impacts.	Ecology, Sedimentation and Coastal Processes	**Substantive FTA Application:** Section 5 **Footnote Appendix:** FN102 **Response Evidence:** Evidence of Dr Alison MacDiarmid (Marine Ecology) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025 – Reliance on modelled information to assess environmental impact	As per the evidence prepared by A MacDiarmid (2025), the modelling undertaken by Macdonald & Hadfield (2017) incorporated a "worst case scenario" and sediment related effects have been assessed on that basis. As per the assessment in section 5, despite the uncertainty, given worst-case scenario modelling has been undertaken, in no instances are the effects predicted to be significant or to a level that cannot be addressed through adequate monitoring and management negating the uncertainty, as is included in the proposed marine consent conditions.

Comments from South Taranaki District Council

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
1	STDC echoes the concern of TRC outlining the information gaps. The technical assessment by PDP highlights that further information is required to accurately assess the impacts of the activity in regard to marine mammals, birds, and the effects of the sediment plume. STDC comments	Ecology, Sedimentation and Coastal Processes, Marine Mammals and Seabirds.	**Attachment 1: Proposed Marine Consent Conditions:** 47-48	With regard to the effects of the sediment plume, refer to 'Evidence of Dr Alison MacDiarmid (Marine Ecology) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025' With regards to the knowledge base on Seabirds, the two-year, pre-commencement environmental monitoring plan (see conditions 47-48) will include a systematic and structured seabird survey covering

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	are provided in this context pertinent to the adverse effects being out of proportion to regional benefits.			the proposed project area (PPA) and beyond. The survey will be temporally resolved enabling seabird abundance within the PPA to be determined on a seasonal basis. This survey will address existing knowledge gaps around the utilisation of the PPA by seabirds.
2	STDC would like to emphasize the comments made by TRC on economic significance (as the most directly affected community). STDC in being the most directly affected community should receive the greatest share of economic benefits that is proportional to the impacts of the activity. The activity lacks a comprehensive assessment of net economic benefits including full social and economic costs needs to be considered along gross economic benefits.	Economics	**Response Evidence:** Leung, C. and Huang, T. (2025). Joint Statement of Evidence of Christina Leung and Ting Huang (Economics) on behalf of Trans Tasman Resources Limited in Response to Comments Received, 13 October 2025, 14-22 p.	Refer to Appendix J - NZIER's Statement of Evidence on the scope and approach of NZIER's EIA. Also refer to paras 35 to 53 of the evidence statement on how NZIER has addressed issues raised around the net economic benefits of the project, including additional analysis.
3	Consideration of recommendations within the Social Impact Assessment should be given to redistribute economic and social benefits within South Taranaki District. This includes consideration of local based employment policies and training. The Social Impact Assessment uses out of date population data (and provides a dataset STDC uses for its planning purposes) showing the deprivation in Pātea (which is currently to receive no direct benefit). STDC request further assessment of economic and social impact on most affected communities and seeks redistribution of economic benefits to ensure they are directly targeted. The Social Impact Assessment also suggests Recreation and Tourism effects are minor but due to the incomplete nature of marine environment impacts this cannot be made with confidence.	Legal	N/A	Neither the FTAA nor the EEZ Act refer to matters of social well-being as a relevant consideration for the application. To the extent that social well-being is related to economic well-being, an updated economic impact assessment is provided.
4	Offshore renewable wind energy sector has advised the seabed mining are incompatible with future wind energy developments in the STB where TTR have states both activities can co-exist. STDC request the Panel give careful consideration in their decision-making.	Legal	N/A	There is no legal basis under the FTAA to consider hypothetical future projects. There is likewise no requirement to consider the Offshore Renewable Energy Bill.
5	Condition 83 Community Fund: 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 (i.e. $200k per annum).	TTR	**Attachment 1: Proposed Marine Consent Conditions:** Condition 83	This recommendation is not agreed. Via the Charitable Trust that TTR proposes to establish, the $50K/year amount proposed is $1.75 million (inflation adjusted) over the 35-year term of the consent. This is considered a fair and reasonable long-term contribution to assist in the establishment of projects for the benefit of the South Taranaki community.
6	Condition 84: Training Facility: 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 (i.e.: inclusion of a percentage). -Further clarity on the location and size of the facility. STDC support its location in the South Taranaki District.	TTR	**Substantive FTA Application:** Section 5.2.3.5 **Attachment 1: Proposed Marine Consent Conditions:** Condition 84	This recommendation is not agreed as it is considered that condition 84 (which is an Augier condition) provides appropriate details confirming that it is intended to base the facility in Hāwera in order to train people from South Taranaki (to the extent that demand from residents is present) in relevant technical and marine skills. TTR's intent to train South Taranaki residents is made apparent through the Advice Note to condition 84. However, mandating a percentage composition of trainees from South Taranaki is inappropriate, as the availability of local staff to train relies on demand, which is a matter beyond TTR's ability to control.

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
	-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.			
7	New Condition (Scholarships): 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.	TTR	**Substantive FTA Application:** Executive Summary and Section 7.2.11 **Attachment 1: Proposed Marine Consent Conditions:** Condition 83	This recommendation is not agreed because TTR anticipates (as noted in the Executive Summary of the Substantive Application report) that the funding provided to the South Taranaki District Council in accordance with condition 83 can be directed towards scholarships, or any other projects that benefit the social and economic wellbeing of the community.
8	New Condition (Information Centre): 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… 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.	TTR	**Substantive FTA Application:** Executive Summary and Section 1.4 **Attachment 1: Proposed Marine Consent Conditions:** Condition 81 - 85	The recommendation for an information centre in Pātea is not agreed for the reasons given in response to similar recommendations by the Taranaki Regional Council and the New Plymouth District Council. Proposed conditions 81 to 85 adequately provide for community stakeholder relationship matters. > TTR will provide a training facility and helicopter logistics base (for personnel and supplies transfers to the offshore vessels) in Hāwera. Condition 84 is amended to refer to establishing the helicopter logistics base in Hāwera. > TTR intends to base its head office in New Plymouth, subject to business decisions and staff availability. Therefore, TTR does not agree to a consent condition mandating the head office location. > The project's geotechnical and environmental monitoring facility will be based in the Port of Whanganui (condition 85). > The project website (condition 81) will be an accessible information resource supplemented by the bi-annual community meetings required by condition 82. These project elements will provide conduits for transparent and real time data and information on the project and monitoring outcomes.
9	New Condition (Main head office): STDC supports the request from TRC section 4.2 (paragraph 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.	TTR	**Substantive FTA Application:** Executive Summary and Section 1.4 **Attachment 1: Proposed Marine Consent Conditions:** Condition 81 - 85	This recommendation is not agreed for the reasons given in response to similar recommendations by the Taranaki Regional Council and New Plymouth District Council and in relation to South Taranaki district's request for an information centre in Pātea, in the row above. > TTR will base its head office in New Plymouth (i.e. in the Taranaki region), but subject to business decisions and staff availability. Therefore, TTR does not agree to a consent condition mandating the head office location. > TTR will provide a training facility and helicopter logistics base (for personnel and supplies transfers to the offshore vessels) in Hāwera i.e., in the Taranaki region. Condition 84 is amended to refer to the helicopter base.

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				> The project's geotechnical and environmental monitoring facility will be at the Port of Whanganui (condition 85). > The project website (condition 81) will be an accessible information resource supplemented by the bi-annual community meetings required by condition 82.
10	New Condition (Main head office): 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.	TTR	**Attachment 1: Proposed Marine Consent Conditions:** Condition 84	This condition is accepted. TTR will provide a training facility and helicopter logistics base (for personnel and supplies transfers to the offshore vessels) in Hāwera. Condition 84 has been amended to refer specifically to establishing the helicopter logistics base in Hāwera.

Comments from Rangitikei District Council

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
1	Rangitikei District Council note the potential gross economic benefits for the region, but the net benefit after accounting for environmental, social and cultural costs remains unclear – and this is viewed as a key test for the Expert Panel.	Economics	**Response Evidence:** Leung, C. and Huang, T. (2025). Joint Statement of Evidence of Christina Leung and Ting Huang (Economics) on behalf of Trans Tasman Resources Limited in Response to Comments Received, 13 October 2025, 14-22 p.	Refer to Appendix J - NZIER's Statement of Evidence on the scope and approach of NZIER's EIA. Also refer to paras 35 to 53 of the evidence statement on how NZIER has addressed issues raised around the net economic benefits of the project, including additional analysis.

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
2	The application lacks sufficient detail to understand potential impacts on seabirds, marine mammals and effects of sediment plumes on sensitive reef ecosystems. with the Council specifically concerned about the extent and speed of sediment transport and its downstream impacts on ecosystems.	Ecology, Sedimentation and Coastal Processes	**Footnote Index:** FN107, FN37, FN 108, FN116, FN153 **Attachment 1: Proposed Marine Consent Conditions:** 4 – 5 **Additional Reference:** Cahoon L (2016) Expert evidence of Dr. Lawrence Cahoon on behalf of Trans-Tasman Resources Limited, 9 December 2016.	Environmental risks of sediment discharge were assessed in a number of reports. Aquatic Environmental Sciences Ltd (2016) provided TTR a report titled "Trans-Tasman Resources Ltd consent application: Ecological assessments" that compiled information from several other reports to assess the potential effects of mining operations on the ecological values of the STB. MacDiarmid et al. (2015) in a report titled "Assessment of the scale of marine ecological effects of seabed mining in the South Taranaki Bight, NIWA Client Report WLG20015-13, 105 p." assessed impacts on zooplankton, fish, kai moana, sea birds and marine mammals. Pinkerton and Gall (2015) in their report titled "Optical effects of proposed iron sand mining in the South Taranaki Bight region. NIWA Client Report No: WLG2015-26, prepared for Trans-Tasman Resources Ltd, 79 p." described the impact of the mining sediment plume on the underwater light environment while Cahoon et al. (2015) in a report titled "Effects on primary production of proposed iron sand-mining in the South Taranaki Bight" detailed the impact on primary production. The effects of the discharge of sediment on primary production were further elaborated by Dr Cahoon in his evidence of 2016 (Expert evidence of Dr. Lawrence Cahoon on behalf of Trans-Tasman Resources Limited, 9 December 2016). Dr MacDiarmid In her 2023 evidence (Expert evidence of Dr Alison MacDiarmid on behalf of Trans Tasman Resources Limited, 19 May 2023) updated the information about the ecological consequential concentrations of suspended sediments on benthic invertebrate fauna. Further, conditions 4 and 5 that will limit mining when pockets of fine sediment are encountered will minimise impacts to the marine environment.
3	Concern about the precedent the Project may establish and future project expansion.	Legal	N/A	*TTR's application is a specific and unique application. Any future applications must be assessed on their merits, and the present application will not set a precedent.*

Comments from Whanganui District Council

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
1a	Evidence of NZIER (as tabled within the Sanofex Limited Statement of Evidence) cannot be relied on.	Legal / Economics	**Response Evidence**: Leung, C. and Huang, T. (2025). Joint Statement of Evidence of Christina Leung and Ting Huang (Economics) on behalf of Trans Tasman Resources Limited in Response to Comments Received, 13 October 2025, 35-53 p.	No weight can be placed on the Sanofex report at this time, as it contains inconsistent claims of authorship (on the one hand stating its author is Dr Loftus, and on the other hand stating the author is the organisation, leaving it unclear who, other than Dr Loftus, may have contributed) and fails to state what qualifications Dr Loftus (or any other contributor) has that are relevant to the subject matter. Additional considerations are addessed in the Statement of Evidence of Shawn Thompson. TTR relies on the updated economic impact assessment.
1b	Independence of pre-feasibility studies by Siecap.	Operations and Process	**Attachment 3:** *Siecap - Taranaki VTM Project Pre-Feasibility Study Offshore Iron Sands Project, March 2025, Section 5.14.* Manuka Resources Limited ASX Announcement 1 March 2023. ***Supplementary Technical Report 42*** *- Ministry of*	TTR and Siecap NZ clarifies that independence is not a requirement for preparing the Pre-Feasibility Study (PFS), and that the PFS was prepared under industry standards governed by the AusIMM (Australasian Institute of Mining and Metallurgy). Both Siecap and TTR personnel are members of the AusIMM and have the qualifications and experience required to undertake such assessments as Competent Persons. TTR's PFS was reported (in March 2023) in accordance with "ASX Interim Guidance: Reporting scoping studies" November 2016 and the JORC Code 2012: Siecap NZ's involvement in the project stems from our long-standing professional relationship with TTR, established through our prior senior roles within the organization. Drawing on this history and detailed understanding of the project's technical, operational, and regulatory background, we have continued to support TTR in a professional capacity. Our ongoing engagement is delivered through Siecap NZ as an

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
			Business, Innovation & Employment - Briefing for the Incoming Minister for Resources – 27 November 2023.	independent advisory and engineering services firm, providing specialist input consistent with our obligations, qualifications and certifications as registered and chartered professionals within the mining, engineering, and environmental sectors. In contrast, the author(s) of the Sanofex report state that they do not hold equivalent professional accreditation or recognised competency under AusIMM standards.
1c	Vanadium Recover CAPEX and OPEX.	Operations and Process	**TTR FTA Attachment 3:** Siecap - Taranaki VTM Project Pre-Feasibility Study Offshore Iron Sands Project, March 2025, Section 7.4. **TTR FTA: Attachment 4:** *Siecap – recovery of vanadium.*	Vanadium processing and recovery are outside the scope of the current application. There is no intention to process the titanomagnetite concentrate for vanadium in New Zealand. The value associated with vanadium is based on third-party processing arrangements, under which the concentrate would be processed outside of NZ and TTR would receive payment for vanadium credits discounted for metallurgical recoveries (est 77% refer Attachment 4: Siecap – recovery of vanadium) and (offshore) processing costs. As such, no CAPEX for mineral processing plant costs are attributed to vanadium processing within the current model.
1d	Overstated Iron Ore Revenue	Operations and Process	**Response Evidence:** Brown, M. (2025). Expert Evidence of Matthew Brown on Behalf of Trans Tasman Resources Limited in Response to Comments Received, 13 October 2025, 16 p.	Several of the issues raised by Sanofex result from incorrect alterations to model inputs and the use of alternative assumptions not aligned with the validated project inputs. These changes have led to misinterpretation of model outputs and a misleading view of project economics. In March 2025 with US$:NZ$ exchange rate of 1.73 when TTR has used a conservative consensus 62% Fe fines input price of US$90/t and a discount of 13.7% for 57% Fe grades as produced in TTR's concentrates. This resulted in a price received for TTR's iron ore of US$77.67/t in the PFS discounted cash flow model (DCF). Capesize shipping was US$10/t that resulted NPV10 of US$1.263 billion or NZ$2.185 billion. This DCF resulted in annual royalties to the government of NZ$54 million, corporate taxes of NZ$136 million and export foreign earnings of US$494m or NZ$854m. Now in October 2025 with US$:NZ$ exchange rate of 1.75 and the 62% Fe fines input price is US$104.50/t with a discount of 9.7% for 57% Fe grades as produced in TTR's concentrates. This resulted in a price received for TTR's iron ore of US$94.36/t in the PFS discounted cash flow model. Capesize shipping is US$9.50/t that delivers an NPV10 of US$1.685 billion or NZ$2.945 billion. The current DCF results in annual royalties to the government of NZ$70 million, corporate taxes of NZ$176 million and export foreign earnings of US$576m or NZ$1,006m. This is around 25% to 30% increase in revenues and government income streams on the DCF model used in the FTAA.
1e	Titanium & Impurity Penalties	Operations and Process	**Response Evidence:** Brown, M. (2025). Expert Evidence of Matthew Brown on Behalf of Trans Tasman Resources Limited in Response to Comments Received, 13 October 2025, 16 p. **Attachment 3:** Siecap - *Taranaki VTM Project Pre-Feasibility Study Offshore Iron Sands Project, Section 12.4.3, 12.6.2.1.*	The 62% Iron (Fe) fines discount applied to the titanomagnetite pricing is used to a typical market range, and as quoted daily by independent industry experts, not a fixed or exaggerated value, as stated by Sanofex. Any reasonable variation within this range would impact on the DCF and IRR outcomes, but not to the extent suggested by the Sanofex review. This range in within the tolerances of Attachment 3: Siecap – Taranaki VTM Project Pre-Feasibility Study. Refer above DCF current metal prices and outputs.

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
1f	TTR model uses wet tonnes (includes ~10% moisture) to calculate revenue, inflating income.	Operations and Process	**TTR FTA Attachment 3:** Siecap - *Taranaki VTM Project Pre-Feasibility Study Offshore Iron Sands Project,* Sections 7.2.3 15.2.1.4 and Table 16.	Sanofex states that the DCF model should be changed to reflect wet tonnes. This is incorrect revenue is based on Dry Weight Tonnage (as it is standard industry practice), as well as freight, processing and the Titanomagnetite ore.
1g	Incorrect Freight Pricing	Operations and Process	**TTR FTA Attachment 3:** Siecap - *Taranaki VTM Project Pre-Feasibility Study Offshore Iron Sands Project,* Section 9.5.	Sanofex incorrectly states that the extra distance TTR will need to ship equates to an additional 1.6 times of cost. Shipping rates do vary and are subject to variability due to availability season etc. The average cost per tonne of US$10 is considered appropriate based on the market for 1 year charter rates of US$23,000 per day.
1h	Limited confidence in the mineral resource	Operations and Process	**Attachment 3:** Siecap - Taranaki VTM Project Pre-Feasibility Study Offshore Iron Sands Project, Sections 18.1 and Appendix 19.12.	The mineral resource has been reported as a JORC Mineral Resource Estimate by a Competent Person in accordance with the Australasian Code for Reporting Exploration Results, Mineral Resources and Ore Reserves ("JORC Code 2012 Edition"). The Taranaki VTM Project Mineral Resource Statement was released to the Australian Securities Exchange (ASX) on 1 March 2023. There is a high level of confidence in the mineral resource reported for the Cook South VTM mineral resource (the proposed mine area under the FTAA) with 864.9Mt (95%) in the Indicated and 49.6Mt (5%) in the Inferred mineral resource categories under JORC Code 2012. The level of mineral resource evaluation and reporting is appropriate for the PFS study, has been independently peer reviewed and subject to compliance with the ASX Chapter 5 Listing Rules. Sanofex ignores that TTR have reported a mining reserve which considers all other mining modifying factors, which provided a high-level mining schedule. Attachment 3 – Siecap – Taranaki VTM Project Pre-Feasibility Study Offshore Iron Sands Project identifies that the BFS will require additional drilling and geotechnical investigations
2	WDC notes the significant information deficiencies for adverse effects on marine mammals, seabirds and the effects of the sediment plume as identified by the Supreme Court in 2016 and have not been adequately remedied.	Planning	**Substantive FTA Application:** Sections 1.5.4, 8.3.13-8.3.14 and 8.2.5 **Response Legal Submission:** Legal submissions on behalf of Trans-Tasman Resources Limited in response to comments received. 13 October 2025	As per section 1.5.4 of the application and addressed in the legal submission on behalf of Trans-Tasman Resources (2025), the relevance of the Supreme Court's 2021 decision is affected by the statutory framework for the present application which is set by the FTA *and not the EEZ Act* under which the previous decision was made. The evidence submitted with the application has been revised and supplemented since the information submitted in 2016, on which the Supreme Court 2021 decision was based. TTR considers that the information submitted in the application and accompanying materials constitutes the best available information, being the information that, in the particular circumstances, is available without unreasonable cost, effort, or time. The necessity of reliance on modelling for certain aspects means the assessments include some uncertainty, but this is to be expected for a project of this scale and location, and does not reduce the reliability of the information. Extensive studies and research have been undertaken at the site identifying the potential adverse effects as described in the substantive application, and the effects of uncertainty have guided TTR's approach to monitoring and management.

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				Despite the uncertainty, in no instances are the effects predicted to be significant or to a level that cannot be addressed through adequate monitoring and management negating the uncertainty, as is included in the proposed marine consent conditions. The Supreme Court's 2021 decision is therefore of limited relevance to the application as per section 8.2.5 of the application.
4	Strongly recommend if the application is approved, the Panel should require a significant bond and trailing liability to offset the uncertain environmental effects, ensure compliance and manage the risk of financial insolvency.	Legal	**Attachment 1: Proposed Marine Consent Conditions:** Conditions 107 and 108 **Substantive FTA Application:** Section 8.3.19	Proposed consent conditions 107 and 108 will require the Consent Holder to maintain public liability insurance for a sum not less than NZ$500,000,000.00. As per section 8.3.19 , a bond is not considered to be necessary in relation to the performance of any conditions during the operational period of extraction, as during that period the EPA has the ability to take compliance action in respect of any performance failure, including the ability to require extraction to cease. Further, if any unforeseen risks were to arise during the operational period of extraction, then these would constitute unplanned events, which would be covered by TTR's proposed insurance.
5	WDC recommends that caucusing occur between economic and mining industry experts to reassess economic benefits based on fair market pricing. It is stated that this project would disadvantage Whanganui by way of precluding a more significant and enduring economic opportunity that they are pursuing (offshore wind farming – s22(6) 'other current or likely uses of the space' and consider the strategic fit.	Economics / Legal	**Response Evidence:** Leung, C. and Huang, T. (2025). Joint Statement of Evidence of Christina Leung and Ting Huang (Economics) on behalf of Trans Tasman Resources Limited in Response to Comments Received, 13 October 2025, 35-53 p.	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. There is no legal basis to assess effects on the alleged loss of opportunity for future wind energy generation activities which at this stage are not even the subject of a legislated approvals process, let alone consented. There is no legal basis to undertake a comparison of the type sought. Section 22(6) applies to Ministerial consideration of referral applications. As a listed project under the FTAA, TTR is beyond any consideration of that sort. TTR relies on the updated economic impact assessment. Refer to Appendix J – NZIER Joint Witness Statement for addressing issues raised around the net economic benefits of the project, including additional analysis.
6	It is also sought that economic opportunity cost is factored when weighting any economic project benefits.	Legal	N/A	There is no legal basis to assess effects on the alleged loss of opportunity for future wind energy generation activities which at this stage are not even the subject of a legislated approvals process, let alone consented.

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7	Gaps and deficiencies in the sediment plume modelling: > The current application does not consider the latest worst-case scenario testing for optical and primary production effects. > The calibration of the sediment plume model across different years and timeframes introduces uncertainty to the modelling. > The size and extent of the depositional area are not fully defined, limiting the ability to accurately assess the magnitude of sedimentation effects on the environment. > There is no updated assessment of localized impacts on reef habitats and associated species.	Ecology, Sedimentation and Coastal Processes	**Footnote Index:** 102, 103 **Response Evidence:** Evidence of Dr Charine Collins on Behalf of Trans Tasman Resources Limited in Response to Comments Received, 13 October 2025. Evidence of Dr Alison MacDiarmid (Marine Ecology) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025	> See Charine Collins Expert Evidence 2025 > See Charine Collins Expert Evidence 2025 > The size and spatial extent of the depositional area were assessed and presented in the application. Spatial plots of predicted seabed deposition thickness are provided in Section 5.1.4 and 5.2.3 of Hadfield and Macdonald (2015) and in Macdonald and Hadfield (2017), Figures 3.20-3.22 and Figures 3-28 to 3-30. These plots illustrate the modelled footprint of deposition over periods of 5 days, 365 days and 2-years. Hadfield and Macdonald (2015) states that the patch source forms a "deposition footprint (>0.01mm) that extends up to 10 km from the patch boundary after 2 years". Estimating the size of the depositional area is subject to change depending on the threshold thickness value used to define the boundary of the depositional area i.e. a higher threshold value will result in a smaller footprint whereas a lower threshold will result in a larger footprint consisting of isolated patches. > See MacDiarmid Expert Evidence 2025 – Impacts on rocky reefs
9	WDC recommends the Panel note the omissions and inaccuracies of the Social Impact Assessment particularly regarding recreational fishing, diving and boat use. It is also suggested that the lack of bespoke sediment plume assessment of significant areas for recreational fishers, divers and boaters launching from Whanganui. It is again asserted that the Panel should consider the impact of the worst-case sediment plume scenario on social and recreational values of the area using updated information provided by the Manawatu/Wanganui Sea Fishing Club.	Recreational Users	**Substantive FTA Application:** Section 5.13.5	As per Section 5.13.5 of the substantive application, it is considered the effects on recreational users will be minor due to the distance of the project area from the majority of recreational users, and minor effects on marine ecology and coastal processes.
10	Whanganui District Council supports the Condition recommendation from Taranaki Regional Council for the Panel to review the certainty, integrity and geographic coverage and term of current assurances and consent conditions and the capacity of the applicant to ensure post-extraction recovery of the wider marine environment. WDC support the progressive payments into a trust fund, public liability insurance with the EPA as the co-beneficiary, public liability cover for the full five year period following cessation of extraction and a bond. With relevance to the imposition of a bond, it is strongly recommended given the environmental risk and uncertainty, need to take a precautionary approach, financial insolvency risk, precedent in the RMA under the FTAA, accountability and incentivised compliance.	Post-Mining Rehabilitation	**Attachment 1: Proposed Marine Consent Conditions:** Conditions 107 and 108	Proposed consent conditions 107 and 108 will address this by requiring the Consent Holder to maintain public liability insurance for a sum not less than NZ$500,000,000.00. The public liability insurance of not less that NZ$500M, that includes environmental restoration and damage to existing assets, and any subsequent environmental effect.
11	WDC strongly recommend a trailing liability to ensure the current owner of the project is financially responsible for clean-up and closure costs even after sale or transfer of the project.	Post-Mining Rehabilitation	**Attachment 1: Proposed Marine Consent Conditions:** Conditions 107 and 108 **Substantive FTA Application:** Section 8.3.19	This recommendation is not agreed. A bond is not necessary in relation to the performance of any conditions during the operational period of extraction, because during that period the EPA can take compliance action in respect of any performance failure, including the ability to require extraction to cease. That is a far more effective form of protection than any bond. Further, if unforeseen risks arose during the operational period of extraction, they would constitute unplanned events, which would be covered by TTR's proposed insurance. Please refer to TTR's responses

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				to similar recommendations by Seafood New Zealand, Beach Energy and the Department of Conservation about insurance. After mining ceases, the only remaining activities would be de-commissioning and post-extraction monitoring. The de-commissioning for this activity is not complex or costly, as the activity relies on structures and vessels which are affixed (if at all) by anchoring. The benthic environment is expected to recover naturally within 5 years, and the proposed conditions require this to be actively monitored and reported to the EPA, including a requirement to identify any potential measures to assist recovery if necessary. Further, the proposed conditions require benthic recovery monitoring during the extraction activity (to take place in the initial area of extraction once mining in that area has been completed), to supplement the current assessments of recovery time. On this basis, the only post-extraction risk that requires to be managed is the risk that natural recovery processes require enhancement. This would constitute an unplanned event during the exercise of consent and would therefore be covered by TTR's proposed insurance.

Comments from New Plymouth District Council

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
1	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.	Social	**Attachment 1: Proposed Marine Consent Conditions:** Conditions81-85 **Substantive FTA Application:** Executive Summary and Section 1.4	This recommendation is not agreed for the reasons given in response to similar recommendations by the Taranaki Regional Council and the South Taranaki District Council. Proposed conditions 81 - 85 provide for these matters, just not in the locations requested. > TTR intends to base its head office in New Plymouth, subject to business decisions and staff availability. Therefore, TTR does not agree to a consent condition mandating the head office location. > TTR will provide a training facility and helicopter logistics base (for personnel and supplies transfers to the offshore vessels) in Hāwera. Condition 84 is amended to refer to establishing the helicopter logistics base in Hāwera. > The project's geotechnical and environmental monitoring facility will be based in the Port of Whanganui (condition 85).
1	NPDC note no new studies of modelling and impact of the plume, effects on marine mammals and seabirds and the effects of rocky reef ecosystems since the Supreme Court Decision – and does not consider the application should be approved in its current form as information to date does not sufficiently address potential significant adverse effects.	Ecology, Sedimentation and Coastal Processes	TTR Memorandum of Counsel in Response to Panel Convener Directions August 4th 2025 **Substantive FTA Application:** Sections 8.3.13-8.3.14	As detailed in TTR's August 4th 2025 Memorandum to the Panel Convener, TTR has commissioned substantial updates to the suite of information and evidence considered by the 2021 Supreme Court decision. This updated information has been lodged with the FTA application and includes updated information relating to the sedimentation plume, effects on marine mammals and seabirds, and the effects on rocky reef ecosystems. TTR considers the Supreme Court's findings only remain relevant to the extent that they align with the FTA framework. The necessity of reliance on modelling for certain aspects means the assessments include some uncertainty, but this is to be expected for a project of this scale and location and does not reduce the reliability of the information.

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				Extensive studies and research have been undertaken at the site identifying the potential adverse effects as described in the substantive application, and the effects of uncertainty have guided TTR's approach to monitoring and management. Despite the uncertainty, in no instances are the effects predicted to be significant or to a level that cannot be addressed through adequate monitoring and management negating the uncertainty, as is included in the proposed marine consent conditions.
2a	NPDC agree with TRC urging the Panel to take a conservative approach to uncertain environmental effect and assume a plausible worst case to base its assessment on. Caution and Environmental Protection should be favoured through the precautionary principle to ensure social, environmental, economic and cultural wellbeing of the Taranaki Region.	Ecology, Sedimentation and Coastal Processes	**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' - Reliance on modelled information to assess environmental impact
3	The proposed seabed mining operation poses significant environmental risk to marine biodiversity and culturally significant areas.	Ecology, Sedimentation and Coastal Processes	**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	The economic benefits of the project are questionable (gross benefits have been outlined not net benefits) – NPDC consider the focus should be on regional benefits given the risk and location of potential impacts and given the economic conditions of the region following changes to oil and gas industry.	Economics	**Substantive FTA Application:** Section 5	Refer to Appendix J – NZIER Joint Evidence Statement.
5	The negative economic effects are significant and will limit offshore wind development and the Panel should consider the opportunity costs when considering the scale of economic benefits claimed by the applicant. NPDC urges the Panel to consider the opposition (iwi, environmental groups, divers, recreational fishers and commercial operators) and consider the potential impacts on existing recreational and commercial activities within the STB. NPDC urges the Panel to quantify the opportunity costs in the proposal being detrimental to the region's tourism brand. NPDC supports the TRC comments regarding insurance and post-extraction responsibilities and wish potential costs associated with clean-up to be considered in terms of the net-economic benefits.	Economics	**Response Evidence:** Leung, C. and Huang, T. (2025). Joint Statement of Evidence of Christina Leung and Ting Huang (Economics) on behalf of Trans Tasman Resources Limited in Response to Comments Received, 13 October 2025, 35-53	Refer to Appendix J – NZIER Joint Evidence Statement has addressed issues raised around the net economic benefits of the project, including additional analysis.
6	There is a lack of understanding around the receiving environments values and the vulnerabilities of species present – and therefore considerable uncertainty around the adverse effects of the proposal. NPDC in hearing a deputation from Karen Pratt (for TRC) highlights the gaps in assessment regarding known reef locations and associated biota, uncertainty regarding other potential reef locations and uncertainty regarding the sediment plume modelling approach. This is echoed by the PDP peer review, and the	Ecology, Sedimentation and Coastal Processes	**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'

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	deputation from the Ngā Motu Marine Reserve Society questioning the reliability of environmental data in relation to kororā | little blue penguin.			
7	Emissions and discharges need to be understood and carefully managed regarding sulphuric dioxide, nitrogen oxides, carbon dioxide and metals and urges the Panel to seek fully to understand potential for acidification. If approved conditions should be in place to ensure robust thresholds, monitoring, reporting and accountability for the health of receptors.	Air Discharge	**Substantive FTA Application:** Section 8.3.6.5 **Attachment 1:** Proposed Marine Consent Conditions Final Conditions 47-48 and 51.	This is not agreed with. i) The Applicant will comply with the latest IMO (**MARPOL**), Maritime NZ and ABS Class society requirements. Since 1 Jan 2020, MARPOL Annex VI caps fuel sulphur at 0.50% mass by mass globally (and 0.10% inside SOx Emission Control Areas i.e. ECAs). There are no designated Emission Control Areas (ECAs) in New Zealand at present. New Zealand has implemented Annex VI via Marine Protection Rules Part 199, which mirrors those limits and enforcement. https://www.maritimenz.govt.nz/media/spohmhjo/part199-marine-protection-rule.pdf ABS recognises two lawful pathways: (a) use compliant low-sulphur fuel; or (b) install/operate an Exhaust Gas Cleaning System, commonly called a "SO_2 scrubber" as approved/verified to IMO guidelines ii) The use of 0.50% sulphur Very Low Sulphur Fuel Oil (**VLSFO**) already fully satisfies the IMO 2020 and Maritime NZ emission requirements. Mandating diesel (**MGO/MDO**) would therefore exceed the regulatory standard and function primarily as a commercially punitive condition, rather than an environmental compliance necessity, although it could marginally simplify operational oversight and slightly reduce particulate emissions. iii) The request for 'Imposing an annual SO_2 mass-emission cap and let the Applicant manage fuel use' will not be sufficient on its own to meet the law. A stand-alone SO_2 cap cannot substitute for Annex VI/Part 199 compliance. iv) Require installation of approved SO_2 scrubbers on engine exhausts See point (i) above v) Require continual ocean neutralisation dosing equivalent to acid gas emissions is not an IMO-recognised compliance method. There is no provision for "neutralising" SOx by adding alkalinity directly to the sea as a substitute. Imposing such dosing would conflict with the Annex VI framework and could raise separate discharge/pollution issues. Workplace/worker health and safety matters are subject to separate regulation and are not matters to be addressed in the EEZ Act approval.
8	If approved, we (NPDC) support conditions to ensure a significant kaitiaki role for mana whenua.	Cultural	**Attachment 1:** Proposed Marine Consent Conditions 72-80	The support for a kaitiaki role is acknowledged. The proposed conditions require the consent holder to promote the establishment of a Kaitiakitanga Reference Group (conditions 72 - 76, 79, 80) and Kaimoana Monitoring Programme (conditions 77 and 78).
9	NPDC considers the potential adverse impacts are sufficiently out of proportion to the project's benefits, even after taking into account potential conditions and modifications to the consent sought. NPDC requests the Expert Panel decline the approval	Legal	N/A	TTR relies on the evidence of its expert, including an updated economic impact assessment, that support a conclusion that the adverse impacts are not significant, and certainly not out of proportion to the project's benefits, taking into account the comprehensive suite of conditions to monitor and manage the activity.

Comments from Horizons Regional Council

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
1	TTR's information gathering processes for previous applications were based off oceanographic data collected within TRC's CMA rather than Horizons – PDP consider that the figures presented in the application regarding background suspended sediment concentrations are difficult to interpret at a scale relevant to Horizons CMA.	Ecology, Sedimentation and Coastal Processes	N/A	The biological and oceanographic sampling occurred in both the TRC CMA and the Horizons CMA, and the plume modelling tracks sediment transported through both CMAs
2	The One Plan includes visual clarity target for the SMA as well as a euphotic target in the Estuarine Water Management Area. While this target is not applicable in the SMA, it provides a reasonable guideline. PDP consider a 10% reduction in the euphotic zone would represent a considerable change in water quality.	Ecology, Sedimentation and Coastal Processes	**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'
3	PDP consider that there is anecdotal evidence that the benthic habitats in the Taranaki CMA are similar to those that exist in the Horizons CMA. To understand effects of the proposed activity, Horizons CMA will require an assessment of localised impact on species present in the Horizons CMA>	Ecology, Sedimentation and Coastal Processes	**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	HRC comment that the sediment plume modelling considered the high sediment load from the Whanganui River and concluded the sediment concentration from mining in comparison is insignificant. PDP acknowledge the high riverine sediment load but notes that offshore benthic habitats are likely to exist between the mining site and the near-shore environment but offshore habitats are less likely to have been influenced by sediment loads.	Ecology, Sedimentation and Coastal Processes	**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'
5	The size of the depositional area is not provided in the application and is considered to be a key information gap in determining potential impacts and extent of mining operation.	Ecology, Sedimentation and Coastal Processes	**Footnote Index:** FN102, FN103	The size and spatial extent of the depositional area were assessed and presented in the application. Spatial plots of predicted seabed deposition thickness are provided in Section 5.1.4 and 5.2.3 of Hadfield and Macdonald (2015) and in Macdonald and Hadfield (2017), Figures 3.20-3.22 and Figures 3-28 to 3-30. These plots illustrate the modelled footprint of deposition over periods of 5 days, 365 days and 2-years. Hadfield and Macdonald (2015) states that the patch source forms a "deposition footprint (>0.01mm) that extends up to 10 km from the patch boundary after 2 years Estimating the size of the depositional area is subject to change depending on the threshold thickness value used to define the boundary of the depositional area i.e. a higher threshold value will result in a smaller footprint whereas a lower threshold will result in a larger footprint consisting of isolated patches. References: Hadfield, M.G. and Macdonald, H. (2015). Sediment Plume Modelling. NIWA Client Report TTR16301, 117 p. Macdonald, H. and Hadfield M.G. (2017). South Taranaki Bight sediment plume modelling: Worst Case Scenario. NIWA Client Report TTR17301, 51 p
6	A number of information gaps exist with benthic ecology:	Ecology, Sedimentation and Coastal Processes	**Response Evidence:** Evidence of Dr Alison MacDiarmid (Marine Ecology)	Refer to 'Evidence of Dr Alison MacDiarmid (Marine Ecology) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025'

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
	> No assessment of horse mussels (which are sensitive to increasing sediment); > Absence of studies assessing SSC on sea pens present in the Horizons CMA; and > Species responses to sediment, where documented, are not consistent – without assessments of species within the Horizons CMA it is difficult to assess impacts from increased sediment.		on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025	
7	The Manawatū Estuary is an important migratory bird habitat and RAMSAR site – the South Taranaki Bight (STB) is located within the Cook Strait Important Bird and Biodiversity Area and is of international importance for seabird conservation. PDP note that no systematic seabird surveys have been carried out including effects on these species from displacement, effects on foraging from the sediment plume, noise, lighting, and potential oil/fuel spills.	Seabirds	**Attachment 1: Proposed Marine Consent Conditions:** 47 and 48	The two-year, pre-commencement environmental monitoring plan (see conditions 47-48) will include a systematic and structured seabird survey covering the proposed project area (PPA) and beyond. The survey will be temporally resolved enabling seabird abundance within the PPA to be determined on a seasonal basis. This survey will address existing knowledge gaps around the utilisation of the PPA by seabirds.
8	Horizons notes that careful consideration when determining the magnitude and scale of effects on species will be required, especially those close to extinction. Given the limited data, there is some uncertainty around effects on marine mammals.	Ecology/Marine Mammals	**Footnote Index:** FN44, FN50, FN156 **Attachment 1:** Proposed Marine Consent Conditions 11, 66 **Response Evidence:** Evidence of Dr Simon John Childerhouse (Marine Mammals) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025	TTR undertook dedicated aerial surveys for marine mammals inside and outside the mining area every 2-3 months for over two years covering over 8,400 km of transects (Cawthorn 2015) and have undertaken highly detailed risk assessment based on the best available data. Evidence by Dr Childerhouse (2023, 2024) and the Application (2025) summarised the significant amount of data available on marine mammals within the STB. Based on this data, Childerhouse (2024) concluded that the best available information presently before the decision makers is sufficient to form a reasonable conclusion about the likely impact of this project. Furthermore, TTR have proposed two years of detailed research on marine mammals prior to the start of any operations within the region. This information would complement the existing, available data and provide additional data useful in confirming the lack of impacts from the project. With respect to uncertainty with the available data, Dr Childerhouse notes (2024, para 10) that there is sufficient data upon which to make robust and accurate assessments with respect to marine mammals. Where the best available information includes gaps or uncertainty, it is still possible to proceed in making sensible judgements while accounting for uncertainty and implementing a precautionary approach if required. Finally, TTR have provided Consent Conditions to protect marine mammals, including killer whales, from any potential impacts of the activity. These include Condition 11 which sets a maximum allowable level of underwater noise from the operation and Condition 66 which is the development of a Marine Mammal Management Plan which will outline the mitigation requirements for the project.
9	TTR suite of reports and additional work is not relevant to the Horizons CMA, particularly on benthic habitats and in PDP's review – HRC adopts the position that the application lacks sufficient resolution or scale to enable a determination of the magnitude of effects in the Horizons CMA.	Ecology, Sedimentation and Coastal Processes / Seabirds	N/A	The biological and oceanographic sampling occurred in both the TRC CMA and the Horizons CMA, and the plume modelling tracks sediment transported through both CMAs.
10	Why is the worst case scenario (for an oil spill) only considered 100 metric tonnes of oil over a two hour period, when vessels have much larger capacities.	Oil Spill	**Substantive FTA Application:** Section 5.4.13.	A 100-tonne spill over two hours is an appropriate "credible worst-case discharge" (CWCD), i.e. the largest realistically credible event. IMO/MARPOL Annex I, ABS and Maritime NZ risk frameworks focus on the largest credible single failure (e.g., a service tank rupture or transfer-line failure with delayed isolation), not total loss of the vessel or multiple simultaneous breaches. Two hours bounds a conservative detection-to-isolation window that covers alarm recognition, muster, source identification and activation of quick-closing valves including degraded conditions (night operations, heavy weather) and potential concurrent DP/position-keeping tasks near fixed assets.

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
10a	Horizons recommends that the response capacity needed to respond to a large-scale incident should be considered, and ensure consent conditions provide for any capacity gaps to be addressed.		**Attachment 1: Proposed Marine Consent Conditions:** Conditions 33-34 **Substantive FTA Application:** Section 5.14.3	This recommendation is not agreed. As discussed in responses to similar comments from Taranaki Regional Council, the Environmental Protection Authority and Beach Energy, proposed conditions 33 and 34 appropriately address oil or fuel spills. TTR is not applying for consent to authorise any disposal, or discharges of harmful substances at sea. All hazardous and/or oily waste shall be stored on board each project vessel and transported to a shore side facility that is authorised to accept such material. Responses to unplanned oil or fuel discharges are regulated by the Maritime Transport Act 1994 and the likelihood of unplanned oil spills can be best minimised through effective management and operational controls. To that end, TTR will prepare a comprehensive Spill Contingency Plan as required by, and in consultation with, Maritime New Zealand. This represents industry best practice, will address the risks of unplanned oil spills and set out the measures to reduce the oil spill ecological risk levels to as low as reasonably practicable. Proposed condition 34 expressly requires the oil spill contingency plans prepared in accordance with Parts 130A and 131 of the Marine Protection Rules to be implemented if a spill occurs. In that event, the Consent Holder must implement all necessary operational responses to ensure adverse effects are remedied or mitigated. The Advice Note to condition 34 reiterates compliance requirements, stating "Parts 130A and 130 of the Marine Protection Rules require oil spill contingency plans to be approved by MNZ for ships and installations".
11	HRC recommends the Expert Panel use the mechanisms available to ensure that insufficient information and uncertainty is resolved to enable a decision based on comprehensive data and assessment given the sensitive nature of the receiving environment. Furthermore, where that uncertainty around adverse effects is present, a conservative view should be taken including the adoption of the plausible worst-case scenario and if the applicant is granted, environmental protection should be expressed through stringent consent conditions	Legal	N/A	TTR relies on the evidence of its experts, who consider the information is sufficient to enable the adverse impacts to be properly assessed, and to have confidence that the comprehensive suite of conditions to monitor and manage the activity, will be effective; ensuring the grant of approval will appropriately favour caution and environmental protection and ensure there is no material harm from the discharge.
12	Panel is recommended to reflect on the weighting of potential water quality targets in the One Plan in relation to euphotic zone and visual clarity changes. Currently, the data is unable to be interpreted at the scale its presented.	Ecology, Sedimentation and Coastal Processes	**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'
13	The development of the sediment plume model used data collected over different years and timeframes and has introduced potential uncertainty and recommend the Panel carefully weigh how this affects confidence in whether the model accurately reflects potential effects in the Horizons CMA.	Ecology, Sedimentation and Coastal Processes	**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'

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14	There is uncertainty without assessment of impacts on likely reef habitats in the Horizons CMA – the Panel is recommended to consider this in evaluation of ecological effects.	Ecology, Sedimentation and Coastal Processes	**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'
15	Without an updated primary production assessment based on the worst-case optical effects modelling, there is not enough information to assess the magnitude of effects on kelp in the Horizons CMA.	Ecology, Sedimentation and Coastal Processes	**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'
16	Uncertainty regarding reef locations and the absence of updated primary production assessment impacts confidence in conclusions about potential effects on reef ecosystems.	Ecology, Sedimentation and Coastal Processes	**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'
17	Without knowing the size and extent of the depositional area, it is not possible to asses the magnitude of sedimentation effects on the receiving environment – recommending the Panel consider this necessary information is missing.	Ecology, Sedimentation and Coastal Processes	**Footnote Index:** FN102, FN103	The sediment plume model calculates and figures display (to the edge of the modelled area) depositional thickness to fractions of a mm which have no ecological impact and can be safely ignored. The size and spatial extent of the depositional area were assessed and presented in the application. Spatial plots of predicted seabed deposition thickness are provided in Section 5.1.4 and 5.2.3 of Hadfield and Macdonald (2015) and in Macdonald and Hadfield (2017), Figures 3.20-3.22 and Figures 3-28 to 3-30. These plots illustrate the modelled footprint of deposition over periods of 5 days, 365 days and 2-years. Hadfield and Macdonald (2015) states that the patch source forms a "deposition footprint (>0.01mm) that extends up to 10 km from the patch boundary after 2 years". Estimating the size of the depositional area is subject to change depending on the threshold thickness value used to define the boundary of the depositional area i.e. a higher threshold value will result in a smaller footprint whereas a lower threshold will result in a larger footprint consisting of isolated patches.
18	There does not appear to be adequate examples of species responses particularly filter feeders to the longevity of the proposed operations and recommends the Expert Panel consider the limitations of supplied information versus the proposed activity.	Ecology, Sedimentation and Coastal Processes	**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' - Impacts on benthic invertebrate filter feeders
19	Recommend the Expert Panel considers the lack of sufficient information to assess the impacts of mining activity on seabirds in the STB.	Seabirds	**Attachment 1: Proposed Marine Consent Conditions:** 47 and 48	With regards to seabirds, the two-year, pre-commencement environmental monitoring plan (see conditions 47-48) will include a systematic and structured seabird survey covering the proposed project area (PPA) and beyond. The survey will be temporally resolved enabling seabird abundance within the PPA to be determined on a seasonal basis. This survey will address existing knowledge gaps around the utilisation of the PPA by seabirds.

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
20	A lack of knowledge regarding seabird presence, foraging areas, behavioural presence has remained a knowledge gap.	Seabirds	**Attachment 1: Proposed Marine Consent Conditions**: 47 and 48	With regards to seabirds, the two-year, pre-commencement environmental monitoring plan (see conditions 47-48) will include a systematic and structured seabird survey covering the proposed project area (PPA) and beyond. The survey will be temporally resolved enabling seabird abundance within the PPA to be determined on a seasonal basis. This survey will address existing knowledge gaps around the utilisation of the PPA by seabirds.
21	Recommends the Panel considers whether the existing limited data on marine mammal populations is sufficient to evaluate the potential impacts of the proposed mining activities.	Planning	**Response Evidence:** Evidence of Dr Alison MacDiarmid (Marine Ecology) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025 Evidence of Dr Simon John Childerhouse (Marine Mammals) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025 Evidence of Darran Humpheson (Acoustics) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025	The necessity of reliance on modelling for certain aspects means the assessments include some uncertainty, but this is to be expected for a project of this scale and location, and does not reduce the reliability of the information. Extensive studies and research have been undertaken by TTR within the STB and at the proposed mining site, identifying the potential adverse effects as described in the substantive application, and the effects conclusions have guided TTR's approach to operations, monitoring and management. TTR's experts have reviewed the submissions and remain of the opinion that , with the inclusion of the marine consent conditions as proposed will avoid, mitigate or remedy any adverse effects so that, the proposal will not result in material harm on the marine environment, habitats and species.
22	Recommends the Panel take into account the noise related impacts on marine mammals, its uncertainty and lack of empirical data to support assessment of magnitude and significance of effects.	Planning	**Response Evidence:** Evidence of Dr Alison MacDiarmid (Marine Ecology) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025 Evidence of Dr Simon John Childerhouse (Marine Mammals) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025 Evidence of Darran Humpheson (Acoustics) on behalf of Trans-Tasman Resources Limited in response to comments received 13 October 2025	The necessity of reliance on modelling for certain aspects means the assessments include some uncertainty, but this is to be expected for a project of this scale and location, and does not reduce the reliability of the information. Extensive studies and research have been undertaken by TTR within the STB and at the proposed mining site, identifying the potential adverse effects as described in the substantive application, and the effects conclusions have guided TTR's approach to operations, monitoring and management. TTR's experts have reviewed the submissions and remain of the opinion that , with the inclusion of the marine consent conditions as proposed will avoid, mitigate or remedy any adverse effects so that, the proposal will not result in material harm on the marine environment, habitats and species.

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
23	Recommends Panel consider response capacity needed to respond to a large-scale incident and ensure consent conditions provide for capacity gaps to be addressed and cross over with MaritimeNZ deemed beneficial.	Oil Spill / Operations and Process	**Response Evidence:** *Thompson, S. (2025). Expert Evidence of Shawn Thompson on Behalf of Trans Tasman Resources Limited*	Two hours bounds a conservative detection-to-isolation window that covers alarm recognition, muster, source identification and activation of quick-closing valves including degraded conditions (night operations, heavy weather) and potential concurrent DP/position-keeping tasks near fixed assets. With the IMV, FSO, a Capesize export vessel, and support craft operating in proximity, TTR will be required to comply with the IMO, Maritime NZ and ABS (Class) regulations: i) IMO COLREGs govern close-quarters conduct, safe speed, risk of collision, lights/shapes, sound signals, and traffic-separation conduct. Any multi-ship operation must be organised to always maintain COLREG compliance. https://www.imo.org/en/ourwork/safety/pages/preventing-collisions.aspx ii) SOLAS Ch V – Safety of Navigation: obliges voyage planning, bridge organization, and use of services like VTS/routeing, critical when coordinating tandem/offloading or parallel operations. https://www.imo.org/en/about/conventions/pages/international-convention-for-the-safety-of-life-at-sea-(solas),-1974.aspx iii) ISM Code (SOLAS Ch IX): requires documented emergency preparedness (drills, scenarios, ship-specific procedures) for collisions, groundings, loss of control, and oil spills, across all participating vessels, not just the storage/offloading unit. iv) MARPOL Annex I (STS operations): if any ship-to-ship (STS) transfer of oil occurs, a Flag-approved STS Operations Plan and procedures are mandatory. v) Maritime Rules Part 22 (Collision Prevention) gives COLREGs legal force in NZ waters for NZ and foreign ships, so all the close-quarters and restricted-manoeuvrability situations around the IMV/FSO/Capesize are enforceable locally. vi) Marine Protection Rules Part 130A (shipboard oil-spill plans) and Part 131 (offshore installations OSCP) require MNZ-approved contingency plans, with notification, salvage/technical support arrangements, and practicable response capability for worst-case scenarios. https://www.maritimenz.govt.nz/rules/all-rules/marine-protection-rules-part-130a/ vii) ABS advisories for shuttle/offloading operations (tandem hawser, hose handling, telemetry/interlocks, comms) and Position Mooring Systems address the practical failure modes that lead to loss of station, contact, or hose parting. Class attendance on bollard-pull tests and system FMEAs is routine. https://ww2.eagle.org/content/dam/eagle/advisories-and-debriefs/marine-shuttle-tanker-advisory.pdf