

BEFORE THE EXPERT PANEL UNDER THE FAST-TRACK APPROVALS ACT 2024

IN THE MATTER of a substantive application by Port of Tauranga Limited for resource consents and a wildlife approval for the Stella Passage Development project, being a listed project in Schedule 2 of the Fast-track Approvals Act 2024

STATEMENT OF EVIDENCE OF DANIEL ALEXANDER KNEEBONE

DATED 16 APRIL 2026



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Introduction

1. My full name is Daniel Alexander Kneebone. I am the General Manager, Property and Infrastructure for Port of Tauranga Limited (**POTL**) and have been in this role since January 2013.
2. In my role I have overall responsibility for the property, engineering, and environmental interests of the Port of Tauranga (**Port**). My role is to ensure developments at the Port meet the needs of existing customers and future demand. This involves the planning and construction of new projects and maintaining the existing assets of the Port.
3. I have a Bachelor of Commerce Degree, majoring in Valuation and Property Management.
4. I previously prepared four Statements of Evidence in relation to the Stella Passage Direct Referral Environment Court proceedings. These were:
 - (a) A Statement of Evidence dated 19 April 2022;
 - (b) A Reply Statement of Evidence dated 30 June 2022;
 - (c) A Supplementary Statement of Evidence dated 30 September 2022; and
 - (d) A Further Reply Statement of Evidence dated 10 February 2023.
5. I also prepared an initial affidavit in relation to the High Court judicial review proceedings regarding POTL's first fast-track substantive application for Stella Passage Development project dated 11 July 2025, and a second affidavit dated 5 August 2025.

Scope of Evidence

6. This evidence is provided in response to the request for information contained within the Panel's Minute 3 dated 31 March 2026 and in particular the clarification sought by the Panel as to whether there are other benefits of the Stella Passage Development (**Project**) that POTL wishes the Panel to have regard to.

7. I understand the NZIER report (provided as Appendix 1 to the Substantive **Application** for the Project, lodged 22 January 2026) to be focused strictly on the Project's economic benefits. My evidence seeks to highlight some of the other indirect economic and non-economic benefits that will result from the Project, which are touched on in the Application. My evidence will cover the following topics:
 - (a) Statistics and graphs to provide context as to POTL's significance to the New Zealand supply chain;
 - (b) POTL's carbon footprint;
 - (c) Infrastructure resilience;
 - (d) Fuel supply resilience;
 - (e) Ships at anchor;
 - (f) Rail optimisation;
 - (g) Space efficiency;
 - (h) Reputation; and
 - (i) Customer specific benefits.

The Port's Significance

8. The Port is New Zealand's largest port, with 33% of New Zealand's total trade by tonnes, and 35% of New Zealand's total trade by value going through it in the year ending June 2025. I have included a series of graphics to illustrate the national significance of the Port, and its operations, at Figures 1 and 2.

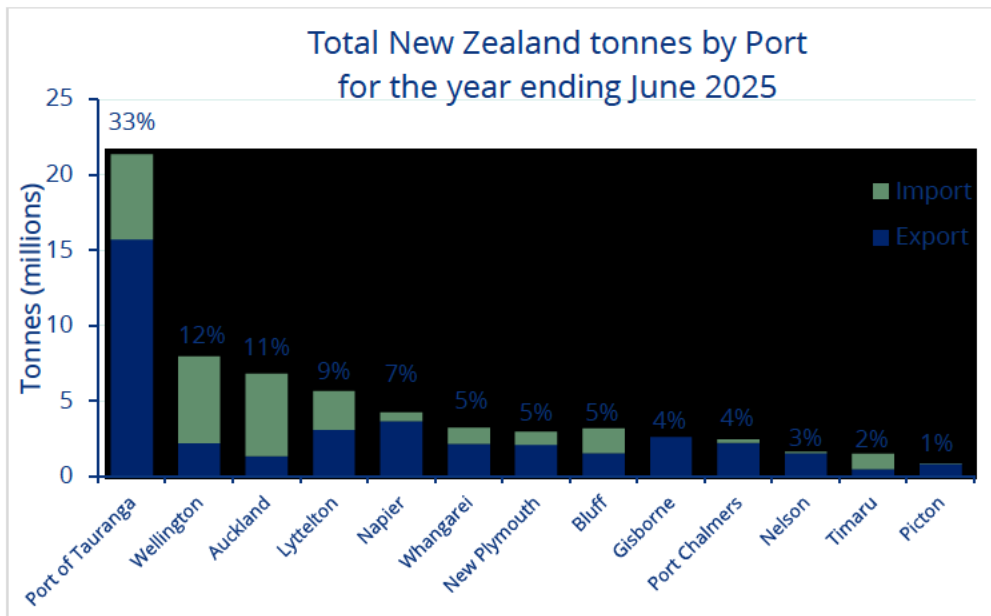


Figure 1

Source Data: Statistics New Zealand

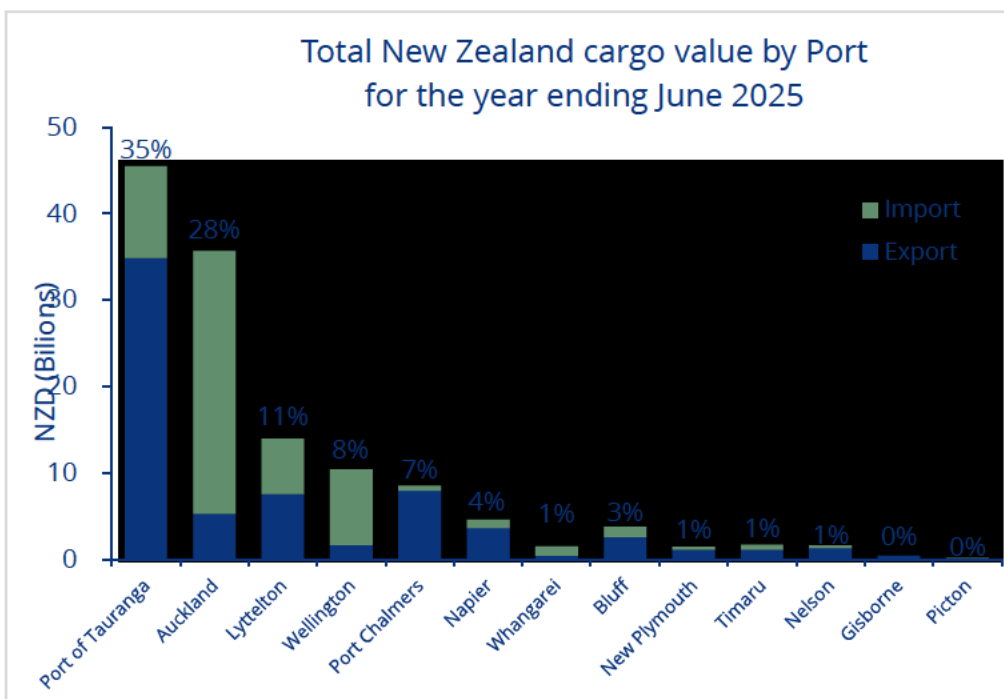


Figure 2

Source Data: Statistics New Zealand

9. POTL operates New Zealand’s largest container terminal, handling 40% of New Zealand’s total container trade, and 48% of New Zealand’s containerised exports measured in twenty-foot equivalent units (TEU) as set out in Figures 3 and 4.

NZ Ports Overall TEU - Year End June 2024 (exclude Tranship/Restow)						
	Export	%	Import	%	Total FY25	%
Port of Tauranga	528,037	48%	360,201	32%	888,238	40%
Ports of Auckland	167,159	15%	416,667	38%	583,826	26%
Lyttelton	137,571	12%	116,231	10%	253,802	11%
Napier Port	96,488	9%	64,085	6%	160,573	7%
Port Otago	98,327	9%	46,905	4%	145,232	7%
Centreport	28,540	3%	31,856	3%	60,396	3%
South Port	22,456	2%	18,687	2%	41,143	2%
Port Nelson	19,229	2%	28,367	3%	47,596	2%
Timaru	11,438	1%	23,653	2%	35,091	2%
Total (TEU)	1,109,245		1,106,652		2,215,897	

Figure 3 Source data: Ministry of Transport

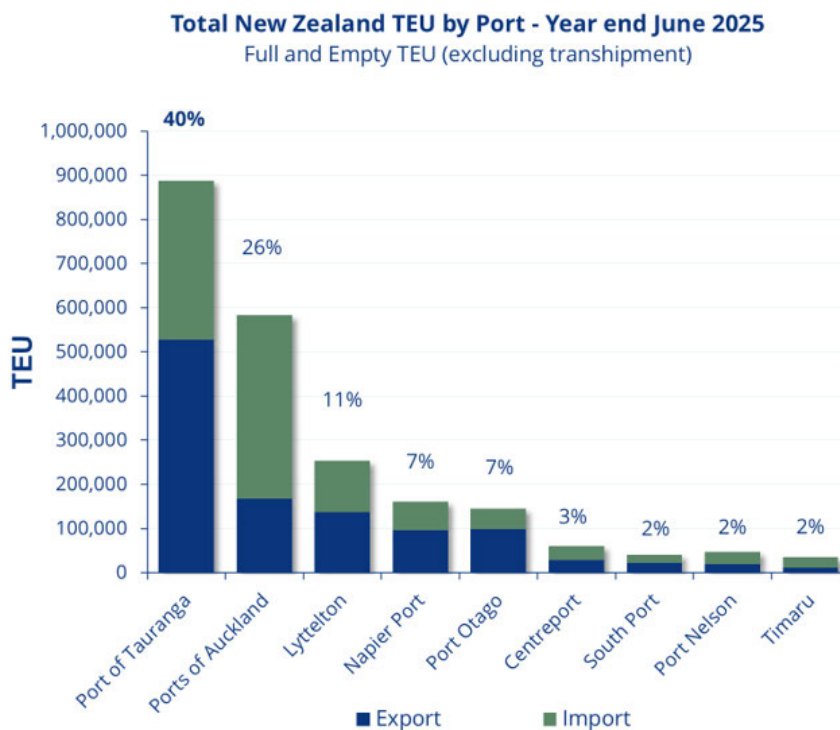


Figure 4 Source data: Ministry of Transport

10. Figure 5 illustrates the significant growth that has occurred at the Tauranga Container Terminal over the last ten years, and that growth is now constrained. The Container

Terminal is now at capacity due to the limitations with quay length which prevent POTL from accommodating extra vessel service calls. In the last three years, POTL has turned down three new services due to the lack of berth availability. Recently, POTL turned away a new service to and from North America because of a lack of berth availability. The new entrant to this trade lane offered importers and exporters a 30% to 40% discount on ocean freight rates. Based on current freight rates, this equates to \$67 to \$89 million per annum in cost savings to New Zealand importers and exporters for this trade lane. Proceeding with the southern berth extension at the Container Terminal as part of the Project creates a significant financial benefit for New Zealand's exporters and importers. The Project's economic benefits are addressed by the NZIER report, but I refer to these forgone opportunities as real-world examples of the benefits to New Zealand that stand to be gained from the Project.

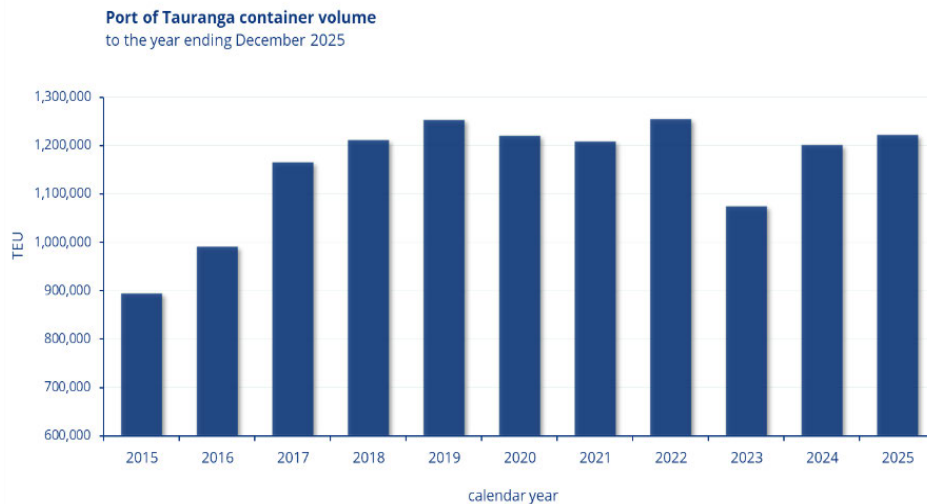


Figure 5 *Source data: POTL*

11. The Port facilitates many of New Zealand's key exports, including 71% of New Zealand's dairy trade, 75% of New Zealand's red meat exports, 31% of New Zealand's export logs and 95% of New Zealand's kiwifruit. As shown in Figures 6 to 9, all of these industries continue to grow (with the exception of log exports which are relatively constant). The Port needs further capacity to ensure that this is able to continue, rather than Port berth availability becoming a constraint to the future cargo volume growth that will be needed to service New Zealand's primary industries.

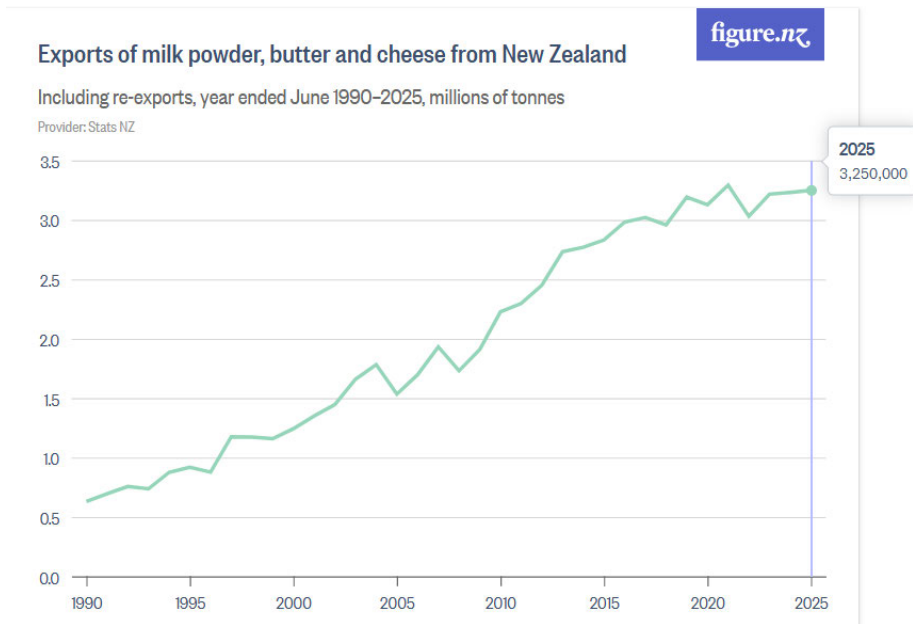


Figure 6

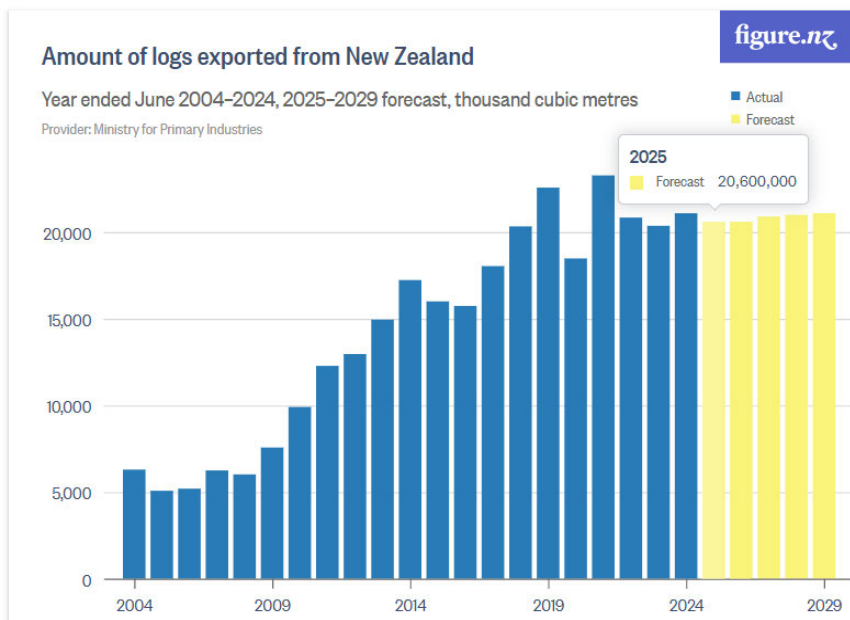


Figure 7

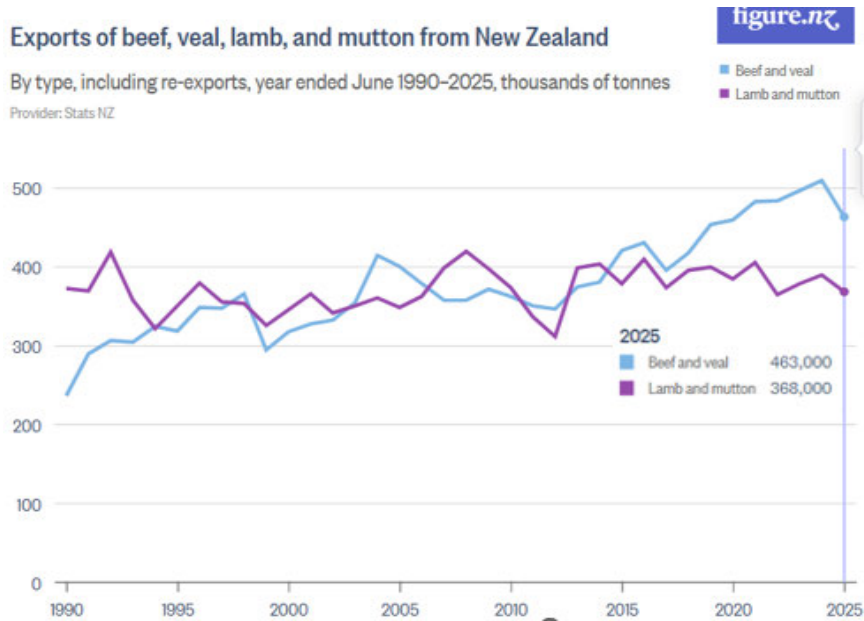


Figure 8

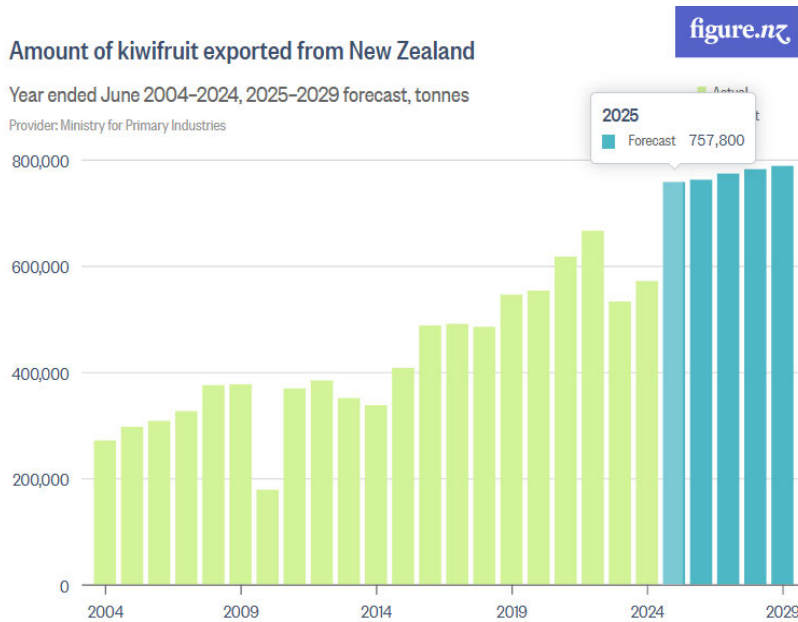


Figure 9

- The Port’s total bulk cargo volumes have increased by 4.8 percent in the last year, underscoring the need for the extensions proposed on the Mount Maunganui wharves. As set out in Figure 10 below, many of the bulk cargo products handled through the Mount Maunganui wharves are critical to the New Zealand economy, including logs, fuel, cement and fertiliser.

Total bulk cargo volumes increased by 4.8%

For the year ended June 2025

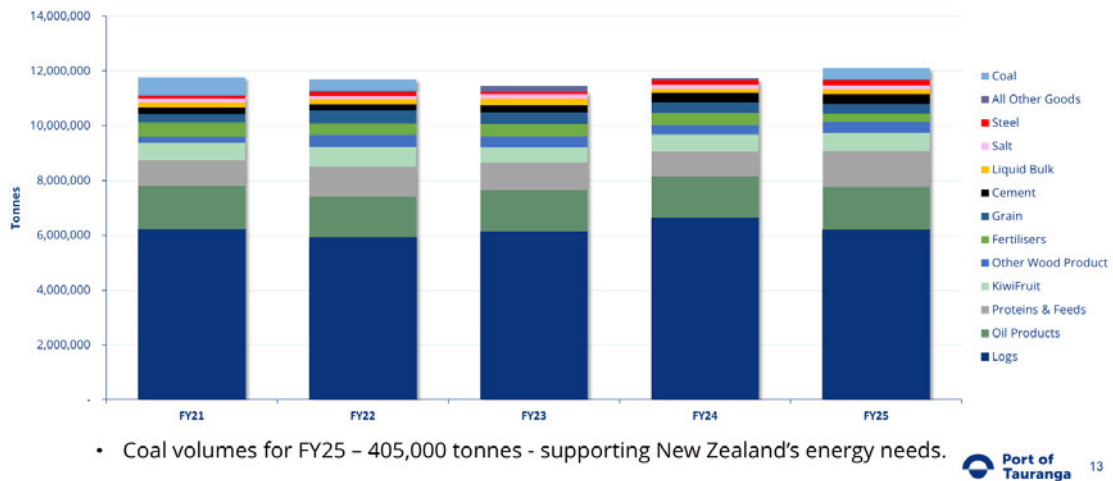


Figure 10

Source data: POTL

Carbon Footprint

13. POTL has a carbon reduction plan and has set an initial short-term target of a 5% reduction in greenhouse gas emissions per cargo tonne per annum and is targeting net zero emissions by 2050. The key ways POTL seeks to reduce emissions is:

- (a) Facilitating bigger ships, which can produce fewer emissions per cargo tonne. For example, an 8000+ TEU vessel would have carbon emissions of 0.013 kilograms per tonne-kilometre (**tkm**). By comparison, a 3000-4999 TEU vessel would have carbon emissions of 0.017 kilograms tkm, and a 2000-2999 TEU vessel would have carbon emissions of 0.020 kilograms tkm. I understand that the size of vessels that most commonly visit other New Zealand ports are 3000-4999 TEU and 2000-2999 TEU vessels;
- (b) Use of coastal shipping which has a lower carbon emission profile when compared to road transport – between 0.017 and 0.020 kilograms of carbon tkm for coastal shipping versus 0.123 kilograms of carbon tkm for road transport; and

- (c) Installation of electric automated stacking cranes, which produce approximately 75% fewer carbon emissions than an equivalent manual straddle operation.
14. The Project will also enable increased transshipment, where larger vessels will arrive and load or unload at the Port, and smaller vessels will ship the cargo to and from smaller ports around New Zealand. This type of hub-and-spoke network model for New Zealand ports is supported by major international shipping lines and exporters. Transshipment already represents one third of POTL's container volume, and has grown 50% in the last 10 years. Few ports in New Zealand have the capability to accommodate the larger vessels now calling at Tauranga. Enabling the Port to continue to grow in this role is therefore critical to maintaining an efficient and competitive national shipping network.
15. The hub-and-spoke model also delivers environmental benefits due to the lower emission profiles of larger vessels as set out above. In a hub-and-spoke scenario, a TEU moving from a South Island port to Shanghai via the Port of Tauranga could achieve approximately a 17% reduction in CO₂ emissions.
16. The Project's increase in berth capacity will result in additional yard storage being required at the Container Terminal. Part of the additional requirement will be catered for through storage intensification within the current footprint, and this will be achieved through the use of electric automated stacking cranes. Automated stacking cranes will reduce the distance travelled by straddle carriers to and from the ship, resulting in lower diesel use.
17. A significant benefit of the Project will be the carbon emission reductions that it will enable as outlined above.

Infrastructure Resilience

18. POTL will be designing new structures associated with the Project to the highest design classification under the international design standards ASCE 61-14, “Seismic Design of Piers and Wharves”, resulting in the proposed wharves being designed to meet the seismic hazard and performance requirements set out in Figure 11.

	Seismic Hazard Level	Performance Level
Operating Level Earthquake	100 year return period	Minimal Damage
Contingency Level Earthquake	500 year return period	Controlled and Repairable Damage
Design Earthquake	2500 year return period	Life safety protection

Figure 11

19. Designing its structures to meet the latest and highest design classification ensures that POTL has the most seismically robust structures. This means that in the event of a natural hazard emergency, POTL’s infrastructure will continue to be usable to the fullest extent possible, and where damage may occur it is readily accessible and repairable.
20. The existing structures were designed to the relevant codes, standards and seismic data available at the time. In 2022 the National Seismic Hazard Model was updated to modernise the model by incorporating contemporary scientific insights and modelling techniques, alongside utilising a significant amount of recent data. The new proposed structures will be incorporating these advancements in seismic understanding and therefore be providing a higher level of resilience to such events than the stock of older wharves currently present. The Project will create a benefit of increased resilience of the supply chain, and connectivity for the Bay of Plenty region in the event that there is such a natural hazard emergency.
21. Another benefit of the Project is that it will enable continued operation of the Mount Maunganui wharves while staged upgrades of the existing Mount Maunganui wharves

are undertaken. By constructing the additional wharves and associated reclamation at Mount Maunganui, the oldest wharves can be progressively taken out of service for repair or replacement without disrupting overall Port operations. While these older wharves are not as heavily utilised as other berths, they still record utilisation of around 40% during peak months. Over the same period, berth utilisation across the southern break-bulk berths typically ranges from 85% to 95%, indicating a system already operating at capacity. Without the proposed extension, removing existing wharf capacity for rebuilding would place significant pressure on berth capacity. This would result in increased vessel waiting times, higher costs for bulk importers, and potentially an inability to meet market demand – i.e. similar issues to those accruing from the current berthing capacity shortfall.

Fuel supply chain resilience

22. The proposed Mount Maunganui wharf extension and mooring dolphins to the southern end of the Mount Maunganui wharves will enable POTL to provide a second modern tanker vessel berth. The mooring dolphins proposed for the existing Tanker Berth will enable larger, modern tanker vessels to berth at the existing Tanker Berth, resulting in a benefit of improved efficiency from fewer vessel calls.

23. Currently, long wait times for the existing singular tanker berth can arise, with waiting vessels being forced to idle at anchor. The berth is currently utilised by a vessel on average 47.4% of the time, which means that 47.4% of the time there is a chance of another vessel waiting to use the berth. Queueing performance can be assessed using United Nations Conference on Trade and Development guidance, which takes into account that vessels arrive randomly and independently, and service times are variable (i.e. some vessels will spend longer in the berth than others). With a utilisation similar to the Port's current scenario, the ratio of queuing time to service time can be estimated at approximately 0.667. This reduces significantly to around 0.19 when the same traffic is distributed across two berths, even where the utilisation of berths remains exactly the same. This illustrates the benefit to be gained by the

additional tanker berthing capacity in terms of waiting times for vessels, and the consequential reliability of the fuel supply chain.

24. There is also a risk of complete loss of service in the event of failure of the wharves, for example in the event of a natural disaster or through unintended damage that means the berth is no longer safe to receive a vessel. By having the infrastructure that allows more than one tanker to berth at once, there is a significant benefit in increasing the resilience of the tanker berth service and easing the congestion. Furthermore, with a newer more modern wharf structure and with the addition of the mooring dolphins to the existing tanker berth, bigger tankers will be able to be accommodated at the Port. POTL is regularly approached by fuel suppliers with requests to provide for bigger tanker vessels to berth at the Port. This is particularly relevant at present, when fuel supply to New Zealand is a risk for our country due to the ongoing conflict in the Middle East.

Ships at anchor

25. Global best practice dictates that Container Terminals should aim for 5% or fewer vessels to have a waiting time of 8 hours or more. Currently, an estimated 9% of vessels are waiting more than 8 hours to berth at the Port. Reputationally, this is something that POTL wants to change and ultimately affects the efficiency of exports from and imports to New Zealand. A key benefit of the Project will be reducing these wait times.

Rail optimisation

26. The Container Terminal currently has a total capacity of 1.3M TEU. To meet the rail demand associated with this volume there needs to be 10 main train services on peak days coming and going from the Container Terminal. Once the Project is operational, the Container Terminal will be able to handle up to an estimated 2.7M TEU. In the scenario where it is handling that volume of cargo, there will need to be an increase to 20 train services on peak days, utilising the existing rail infrastructure in place at the

Container Terminal. Doubling the use of the existing rail network is a significant benefit in terms of the optimisation and efficient use of the New Zealand's existing rail infrastructure.

Space efficiency

27. Use of the coastal marine area for Port activities should be efficient. The Port has a benefit compared to other major ports in that it is a highly efficient use of space due to the one continuous, long quay, with this Project seeking to extend that. By contrast, the Port of Auckland is not one continuous quay, using what is known as finger wharves, meaning that it uses a significantly higher proportion of the coastal marine area, to provide the same amount of wharf frontage. Practically, this means that Port of Auckland is only able to take three container ships at once, no matter what their length, while the Port's proposed continuous quay means the wharves could take three large ships, or a number of combinations of smaller ships. This continuous quay of the Port and the extension of it through the Project is a benefit in terms of the efficient use of a small amount of coastal marine area to achieve a significant gain in terms of wharf space and consequential shipping movements.

28. In the same vein, as well as being efficient from a space used perspective, the Port is highly efficient in the way it handles throughput. The largest container terminal in Sydney has annual volumes of 1.2M TEU/year, on 1400m of berth. Comparatively, Tauranga handles 1.25M TEU/year on just 770m of berth. Figures 12 and 13 illustrate that it is not inefficiency driving the Project, as POTL is very competitive with other ports in terms of the time it takes to load and unload vessels, and is ranked number one on the S&P Global Container Port Performance Index for Australasia and Oceania. This illustrates a benefit in terms of the extensions, once constructed, being utilised efficiently.

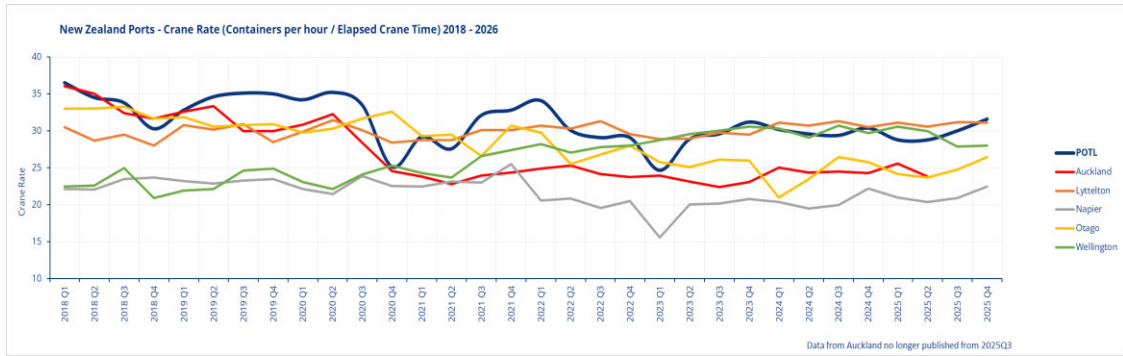


Figure 12 Source data: Ministry of Transport

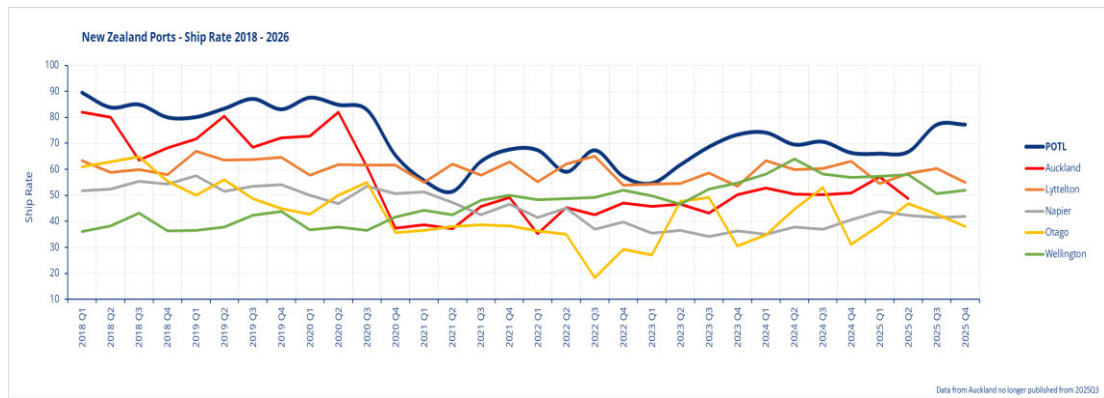


Figure 13 Source data: Ministry of Transport

Reputation

29. There is a significant benefit to POTL’s reputation, both nationally and internationally, to be gained from the Project. Being seen as a reliable port with short ship waiting times, efficient use of wharf space, and capacity to take on new services (all of which will result from the Project) is a significant benefit that should not be underestimated. By being an exemplar for New Zealand ports, POTL can help ensure shipping lines retain their current service levels, protecting importers and exporters from the risk of less competition and potentially having to ship their goods via Australia to maintain international connectivity. Having to tranship cargo through Australian ports would add time, cost and complexity to New Zealand supply chains. The Project is a means to minimise the risk of these outcomes.

Customer Specific Benefits

30. I expect that comments will be received by the Panel from a number of our customers and tenants who were invited to comment on the Application. These comments are likely to include examples of benefits which are aligned with those set out in this statement, such as those relating to efficiency and reputation. I expect that there will also be other benefits for groups that are specific to their industries and businesses, and they are better placed to comment on this. The broad range of industries and businesses who are able to attribute benefits, both financial and otherwise, from the Project is reflective of the unique role that ports and in particular, the Port, play in facilitating trade, development and growth for many different industries in the Bay of Plenty and more broadly, New Zealand.

Daniel Alexander Kneebone

16 April 2026