Before the Taranaki VTM Expert Panel

under:	the Fast-track Approvals Act 2024 and Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012
in the matter of:	an application by Trans-Tasman Resources Limited for marine consents to support a seabed mining operation in the South Taranaki Bight

Statement of evidence of **James Philip Perry** (Impacts on Offshore Wind Development) on behalf of Taranaki Offshore Partnership

Dated: 3 October 2025

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STATEMENT OF EVIDENCE OF JAMES PHILIP PERRY ON BEHALF OF TARANAKI OFFSHORE PARTNERSHIP

INTRODUCTION

1 My name is James Philip Perry.

2 I am a Wind Turbine Package Director for Copenhagen Offshore Partners. In this capacity I currently have senior management roles in relation to two offshore wind projects being developed off the coast of Gippsland in Victoria, Australia. More specifically, I am the Project Director for Southerly Ten offshore wind project, Kut-Wut Brataualung and the Technical Development Director for Southerly Ten offshore wind project, Star of the South.

3 I was previously the Project Director for Siemens Gamesa Renewable Energy for the Hornsea Two offshore wind project in the United Kingdom.

4 I hold a Bachelor of Environmental Engineering from the University of NSW. I am a Chartered member of Engineers Australia and a Chartered Project Professional with the Association for Project Management. I have worked in the offshore wind sector since 2008 in both development and execution phases of projects.

5 My current role within Southerly Ten focuses on derisking the development pathways for the Star of the South and Kut-Wut Brataualung offshore wind projects. As the Project Director / Technical Development Director I am responsible for overseeing the different environmental, technical and commercial considerations associated with the development pathways for these projects.

CODE OF CONDUCT

6 Although this matter is not before the Environment Court, I confirm that I have read the Code of Conduct for expert witnesses as contained in section 9 of the Environment Court Practice Note 2023. As I am employed by Copenhagen Infrastructure Partners, I acknowledge I am not independent. However, I have sought to comply with the Code of Conduct insofar as this statement of evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions I express.

SCOPE OF EVIDENCE

7 I am authorised to make this statement on behalf of Taranaki Offshore Partnership (*TOP*) in relation to the application lodged by Trans-Tasman Resources Limited (*TTRL*) for marine consents under the Fast-track Approvals Act 2024 (*FTAA*) and Economic Zone and Continental Shelf (Environmental Effects) Act 2012 (*EEZ Act*).

8 TTRL seeks marine consents to extract 50 million tonnes of seabed material per year, over 20 years, mechanically recover 5 million tonnes of heavy mineral sands concentrates containing iron ore, vanadium and titanium, and return the de-ored material to the seabed (*Proposal*).

9 My evidence will address:

9.1 The key features of an offshore wind farm;

9.2 Impacts of the Proposal on the ability to plan, construct and operate offshore wind development in South Taranaki and the feasibility of offshore wind development in New Zealand;

9.3 My comments on conditions to manage adverse impacts on offshore wind development; and

9.4 My overall conclusions regarding the impacts of the Proposal on offshore winder development in the South Taranaki Bight.

10 As part of the above, my evidence addresses potential effects on windfarm construction and operation resulting from changes to the seabed. My evidence relies on:

10.1 Mr Regan King's statement of evidence, which addresses the impacts of the Proposal on the geotechnical characteristics of the seabed; and

10.2 Mr Peter McComb's statement of evidence, which addresses the impacts of the Proposal on seabed morphology and ocean dynamics, and timeframes for remediation of those impacts.

11 I have also reviewed Mr Fraser Colegrave's statement of evidence.

SUMMARY OF EVIDENCE

Planning implications

12 When investigating or developing offshore windfarms, a detailed understanding of seabed conditions is required to progress design refinement of foundations, cables and supporting installation infrastructure.

13 Both within and beyond the mining area, the Proposal will have impacts that introduce high levels of uncertainty around the seabed condition, as explained in the evidence of Mr King and Mr McComb. These impacts will substantially increase the costs of investigating and developing an offshore windfarm, increase technical design risk and create high levels of uncertainty around financial investment.

14 In my opinion, this increased uncertainty and the impact on commercial feasibility and planning is likely to prevent an offshore

wind project from proceeding in an area where direct impacts on the environment occur from seabed mining. This includes the proposed approximate 66km^2 mining area, the mooring buffer area and the safety exclusion zone.

15 In my opinion, supported by the evidence from Mr King and Dr McComb, there also remains high uncertainty as to the environmental impacts that would occur to the wider area outside of the directly impacted area. This area is likely to be impacted by changes in seabed morphology. However these are complex broader changes that are not addressed within TTRL's application. The high level of uncertainty around these impacts is therefore also likely to either prevent an offshore windfarm from proceeding, or substantially increase the timeline required to undertake planning for a future windfarm. This is due to the need for extensive and long term understanding of any changed conditions that occur due to the Proposal.

Construction implications

16 Construction of an offshore windfarm on a previously mined area is not feasible due to the high uncertainties as to the state of the seabed post-mining, as explained in the evidence of Mr King and Dr McComb.

17 Accommodating mining activities concurrent to the offshore wind construction phase, in a coexistence arrangement where seabed mining occurs in an adjacent area to offshore wind construction, would have considerable navigation safety risk levels, would require high levels of coordination and would breach existing safety zone distances that underpin the chartering of specialised vessels. The extent of this disruption may create management requirements that are not feasible to implement, preventing projects from having financial certainty.

Operational implications

18 The coexistence of seabed mining during the operational phase of an offshore windfarm would significantly increase the risk of damage to offshore wind infrastructure. Ultimately, it would introduce sufficient uncertainty that financing of such a windfarm project would be significantly undermined or made impossible.

Environmental monitoring

19 Further, the marine consent conditions that would be anticipated to be imposed on an offshore windfarm would require the monitoring of possible environment effects of the windfarm. It is difficult to identify an approach where offshore wind could successfully implement consent conditions to monitor effects from the windfarm and isolate and exclude those that would occur as a result of mining operations. This would create not only compliance and monitoring issues but would also be a consideration in financing an offshore windfarm.

Conditions

20 TTRL's proposed conditions associated with the existing Kupe Petroleum Mining Licence #38146 operator (*Kupe Operator*) could be amended to apply to any holder of Offshore Renewable Energy feasibility and commercial permits in the vicinity of the Proposal. However, the Kupe operations are limited to a small amount of seabed infrastructure and a small amount of vessel operations, compared to offshore wind. The potential location of offshore wind assets on three boundaries of the Proposal area also introduces significantly different navigation and safety risk considerations compared to the Kupe assets. As such, conditions required to mitigate impacts of the Proposal offshore wind would be considerably more onerous than those proposed for the Kupe Operator.

Conclusion

21 For the above reasons, my opinion is that the coexistence of an offshore wind farm and seabed mining in the same broad area of seabed would present considerable challenges to the ability to successfully develop, fund, finance, construct and operate a commercially feasible offshore windfarm. Those challenges are so significant that I expect that it is unlikely that a developer would pursue or be able to secure finance for an offshore windfarm impacted by seabed mining.

OFFSHORE WIND DEVELOPMENT IN SOUTH TARANAKI

Typical components of an offshore wind farm

22 A typical offshore wind farm consists of a number of wind turbines installed out at sea, where the wind is stronger and more consistent than on land. The turbines are connected to each other by electrical subsea Array Cables, which converge to a central platform called an Offshore Substation.

23 As shown in **Figure 1**, the electricity from all turbines is collected by the Array Cables and then sent to shore via Export Cables laid on the seabed. After passing through an Onshore Substation, the electricity is delivered to the Transmission grid and then to all users in the country.

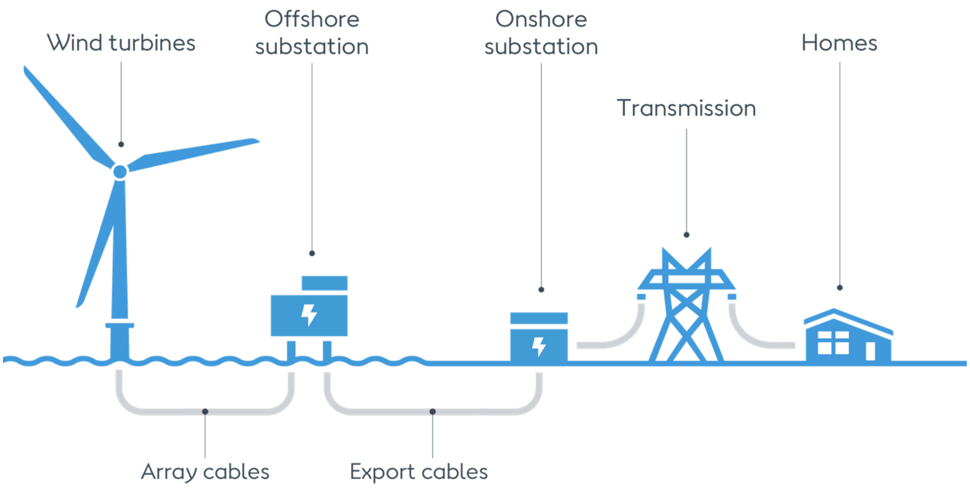

Figure 1 – Typical components of an offshore wind farm

IMPACTS OF THE PROPOSAL ON FEASIBILITY OF OFFSHORE WIND DEVELOPMENT

Implications of the Proposal for planning an offshore windfarm

24 The design of an offshore windfarm is refined as site information is collected, environmental approval conditions are understood, and procurement activities are undertaken.

25 To reach a point where financial investment can be made, a developer is required to refine the design elements of the windfarm to a detailed level that allows for both the windfarm infrastructure (foundations, cables, turbines, etc) and the installation infrastructure (foundation installation vessels, ports, cable lay vessels, etc) to have signed supply contracts in place.

26 The timeline for development of an offshore windfarm from initial concept through to construction completion exceeds ten years on average. The planning phase of the project, prior to a project reaching financial investment decision, generally requires six to seven years within which the project will obtain all necessary environmental approvals, achieve a grid connection agreement, secure a bankable revenue and debit structure and complete all procurement works. This timeline can extend further in regions without strong government policy and support for initial development.

27 This timeline creates a challenge for developing an offshore windfarm in the vicinity of the TTRL Proposal, particularly given the

potential for seabed mining to occur in the area prior to offshore wind infrastructure being installed.

28 Developing a windfarm in or adjacent to an area that has been or may be mined presents significant challenges to the design and selection of windfarm components and infrastructure, as well as planning the installation infrastructure elements.

29 Undertaking baseline environmental assessments and surveys to inform consent applications (as well as monitoring environmental conditions during operations) will be challenging under any scenario where seabed mining has occurred in the area proposed for a windfarm, or is occurring in an area adjacent to a proposed windfarm. This is due to the high level of change to the environment anticipated to be caused by an operation as intrusive as the Proposal.

Foundation design

30 Progressing foundation design where seabed mining has already occurred will be particularly challenging.

31 Identification of suitable foundation types requires certainty around seabed geomorphology including the bathymetry, geophysical and geotechnical properties of the site. The mining process TTRL proposes introduces uncertainty for these three considerations and in particular the characteristics and condition of the deposited de-ored sediment that will form the post-mining upper seabed, as is set out in the evidence of Mr King and Dr McComb.

32 The impacts of the Proposal on the bathymetry, geophysical and geotechnical properties of the seabed addressed in the evidence of Dr McComb and Mr King will challenge the ability to select which foundation type is most appropriate for the site. Initial foundation type selection is a fundamental design driver associated with the cost of energy for an offshore windfarm project.

33 Certain foundation types, such as a gravity bases or suction bucket solutions, are solely reliant on the upper meters of the seabed surface. Having a lack of certainty around the properties of the seabed surface would eliminate this foundation type from consideration.

34 Alternate foundation types, such as monopiles or piled jackets are reliant on achieving stability through embedment of a pile. The length of embedment is dependent on the properties of the soil through which they are installed in. Piles may be installed 30 to 50m into the seabed for example, however if there can be no certainty as to the properties or level of support that the upper 11m of seabed will provide, this may require the pile length (and associated embedment length) to be increased by the same distance.

35 The upper 11m of seabed therefore has a significant impact as to which foundation type may be feasible for a site, and also influence the size and associated cost of any concept. Following preliminary concept selection, the foundation design is then refined as further information from the site is obtained.

36 The Proposal presents a significant challenge for this refinement process, reducing the ability of a project to optimise the foundation design, as site information would only become available following the completion of seabed mining. Planning foundations in an area that may be mined would result in a highly conservative, and potentially unviable, design.

Foundation and turbine installation vessels

37 The installation of modern offshore wind foundations and turbines requires the use of specialised vessels, with many vessels now being constructed specifically for this industry. The availability of vessels that are suitable for the specific designed foundation and turbine is fundamental to achieving the financial close of a project, as vessel charter parties are one of the contracts that must be in place before financial close.

38 In order to progress the procurement of a vessel the project must have certainty over the time period when it is required, the work it must complete and the site conditions for which it will operate in. Current lead times for vessels capable of undertaking foundation installation are between three and four years before the vessel must be mobilised.

39 In selecting a vessel, several studies will be undertaken for the purposes of providing certainty to financial institutions backing the project. These studies must demonstrate that the site is suitable for the selected vessel. Turbine installation traditionally requires a jack-up vessel to provide a stable platform. A jack-up vessel has legs that apply pressure to the seabed to establish a stable platform that is raised above the sea height. To establish this stability, the legs must penetrate the seabed to a depth at which the weight of the vessel, including all components, can be maintained.

40 The technical considerations associated with the geotechnical and geophysical studies necessary to determine this penetration depth into the seabed is considered further in evidence provided by Mr King.[1] The possibility of prior completion of seabed mining will create uncertainty as to the seabed conditions that are taken into account for these studies, which in turn creates challenges for the selection of vessels, increasing uncertainty around the financial investment decision from developers' financial institutions.

[1] Evidence of Mr Regan King (dated 3 October 2025), paragraphs 21 - 32.

Supporting structure design

41 Even if a primary foundation design and its supporting installation infrastructure can be identified, a challenge remains as to the design of the supporting structures and through-life considerations.

42 One such supporting structure needed for the turbines is the scour protection for the foundation, which protects the foundations from scour occurring around it throughout its life to protect the integrity of the turbine. If there is uncertainty as to the ground conditions, the design for this scour protection will also require considerable conservatism and/or introduce further conservatism into the primary structure consideration.

43 Another supporting structure is needed to ensure the array and export cables that transition between the seabed and the structures are protected from excessive movement. These secondary structures are normally steel J-tubes or I-tubes that are attached to the main foundation and support the cable running down the side of the foundation to a point above the seabed, which prevents long spans of cable being exposed to the movement of the water currents, which can cause cable damage or breakage. Designing these structures will be highly challenging if there is a large amount of uncertainty about the true seabed level.

44 **Figure 2** below shows a diagram of the external J tubes on the left hand side of the foundation structure.

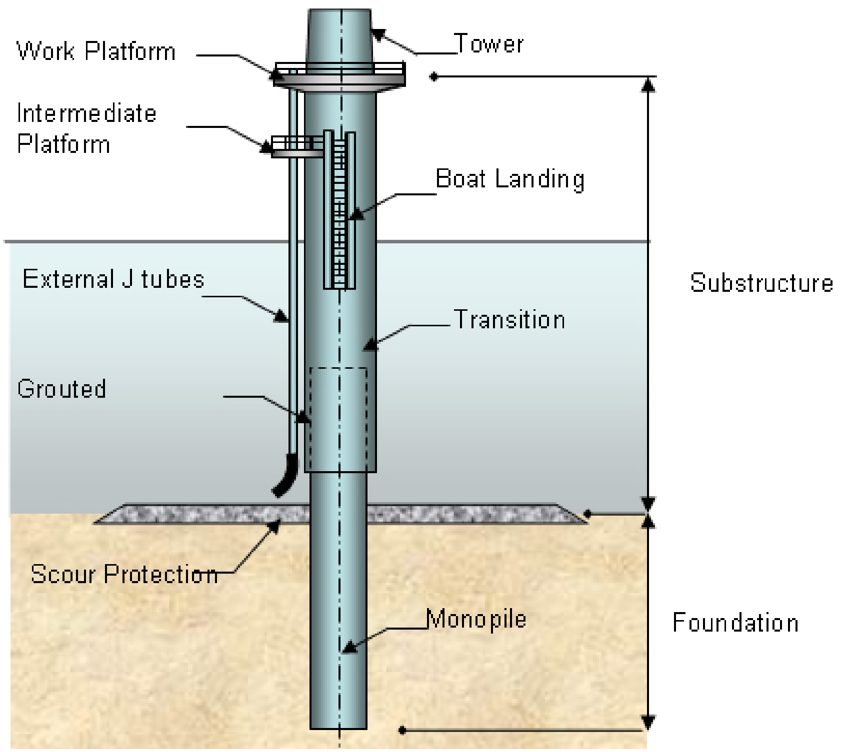

Figure 2 – External J tubes

Export and array cables

45 The array cables that transmit the power between turbines and the export cable that ultimately transmits the power to shore also require protection. Generally, for export cables this protection is achieved by burial of the cables, which protects these cables from anchor damage, fishing damage, or damage caused by natural movement. In planning a windfarm, having an understanding of how cables can be buried and how they will stay buried for the lifetime of the windfarm is a key consideration affecting the cable type and route selection, as well as cable installation methodology.

46 These considerations affect the technical viability (how long cables will last) which in turn affects commercial viability (how much electricity can be produced), and therefore financial viability (how the project can be funded). If seabed mining has impacted the upper seabed (and particularly if it has impacted the top 11m of the seabed, as is expected based on the evidence of Mr King and Dr McComb),[2] then it would create a high level of uncertainty as to how cable burial can be achieved and maintained.

Cable installation vessels

47 As for foundation and turbine installation vessels, vessels capable of carrying and installing the cable types and lengths required for offshore wind are specialist vessels. This means the number of vessels available in the global market is considerably limited. Cable installation vessels are supported through the use of cable burial equipment that will plough, jet or trench the cable into the seabed. This burial of the cable will be done to a depth where the cable is then expected to be protected and to stay buried for the duration of the windfarm's lifetime. If there is uncertainty over the state of the seabed or the future state of the seabed then the requirements for selection of cable vessel and associated installation technique will also be unclear.

Implications of the Proposal for construction of an offshore wind farm

48 Following the six to seven year planning phase discussed above, construction of an offshore wind project commences and typical takes three to four years to complete for a 1GW windfarm of the scale contemplated by TOP.

49 During the construction phase, multiple scopes of work are conducted in parallel to reduce the total duration of offshore construction. This concurrent construction approach results in a high number of vessels being present in the offshore windfarm area at any one time. Under normal conditions where a windfarm

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[2] Evidence of Mr Regan King (dated 3 October 2025), paragraphs 30 – 34. Evidence of Mr Peter McComb (dated 3 October 2025), paragraphs 28 - 30.

construction area is being used for a single purpose, these vessel movements are controlled via a single maritime coordination centre.

50 The coordination centre is typically funded by the developer and has the power to dictate which scopes of work have the priority at any point of time. This priority could be due to safety considerations, technical considerations or contractual considerations.

51 The significance of this prioritisation is important due to the high commercial exposure that is present during the construction of an offshore windfarm. At the point where offshore construction commences, offshore wind projects are exposed to very high capital expenditure with no return until electricity generation commences. Turbine commissioning and power generation requires all previous steps of the construction chain to be complete, so a delay in any of the stages can have significant impact on the overall business case for the project.

Vessel coordination

52 If a wind farm was being constructed at the same time as seabed mining was occurring in a similar area, it would be necessary to carefully coordinate the vessel movements in order to ensure all operations could continue efficiently without impacting either operation.

53 In my opinion, it would be challenging to establish a joint industry coordination function for both mining and windfarm construction vessels in a way that would be acceptable to the financers of an offshore wind project. This is because each operator would be seeking assurance that their operations would have priority and not be at risk of delay due to other operations outside of their control, which is an assurance that would not be possible to give and therefore could not be relied upon by financial institutes.

Navigation safety risks

54 Even if vessels were coordinated, spatial co-existence of mining and construction activities would present a navigation challenge and increased navigation risks, which would increase based on the number and type of operations occurring. It is not uncommon to see in excess of 15 vessels supporting construction of an offshore wind project and being in operation at a single time. The safety standards, communication procedures, and movement plans for these vessels are all centrally planned and coordinated.

55 The main windfarm construction vessels will utilise jack-up vessels, dynamically positioned vessels and potentially anchor moored vessels. It is common for these major vessels to request a 500m safety distance around them as they are conducting operations. This allows vessels to maintain a safe distance if a dynamically positioned vessel loses position or an approaching vessel loses control. It also allows for the safe lifting areas to be maintained

when equipment over 100m in length is being positioned either in the water (as the case for a monopile) or in the air (as the case for a turbine blade).

Safety zone distances

56 The current minimum distance between offshore turbines is just over one kilometre, as determined by the radius of the turbine generator. Wind turbines in the South Taranaki Bight are likely to be spaced out at distances between 1.5-2km. The proposed mining block sizes without anchor movement from TTRL are 900m by 600m[3], with an additional anchor mooring radius of 1 nautical mile (1.85km)[4] plus requested anchor buffer zone around the mining vessel both of which will extend beyond the boundary of the mining permit area[5]. This scale of area required for seabed mining could not be accommodated between wind turbines when construction is occurring, as they would impede the safety zone for the construction vessels around the turbine locations. Further to the physical constraints of the space between the rows, any jack-up vessel would need to ensure that the structural integrity of the seabed where it is jacked up is not at risk. As such, I would expect that operators could request an increased safety distance be maintained, or assurances as to the state of the seabed be provided, from any area where a vessel is jacked up or proposed to jack up.

Implications of the Proposal for operation of an offshore wind farm

57 Similar considerations apply to co-locating mining activities during the operation phase for an offshore windfarm as for the construction period. The main differences are that the construction vessel safety zones are not relevant and the number of operating vessels is much lower.

Vessel coordination

58 In an operational windfarm context, there could be up to four crew transfer vessels (*CTV*) operating, or one Service Operation Vessel (*SOV*) operating with the support of one CTV. During periods of major maintenance, a jack up vessel may be on site, however this would be an event that would be specially coordinated. For planning purposes, a jack up vessel could be assumed to be on site once per annum. As for construction, coordinating these vessels and the associated safety zones with mining activities could be challenging.

59 As the Proposal area is surrounded on three sides by TOP's preferred offshore wind site, this configuration could create a narrow

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[3] Attachment 3a: Siecap - Pre-Feasibility Study part 1, section 10.1, Anchor Relocation.

[4] Attachment 3a: Siecap - Pre-Feasibility Study part 1, Appendix 19.6 RN Barlow Maritime Operations Review, Section 3.1, Marine Vessel Operations – The FPSO.

[5] Attachment 1: Proposed Restricted Activities and Consent Conditions, Schedule 5 – Plan of consented integrated mining vessel mooring area boundary

entry and exit transit point for all mining vessels to access the site. TTRL's application includes a buffer area outside of the Proposal area for the placement of anchors and moorings[5]. At times these anchors and mooring lines would be within the offshore wind area.

60 TTRL says that, following the mined ore being transferred to the FSO (floating storage and off-loading vessel) the FSO will sail to "a calm area off the South Island, approximately 70Nm from the mining location".[6] It is also noted that alternate locations for offloading are mentioned within the Application,[7] however these alternate discussions do not provide any location that allows further analysis. Considering the 70Nm location, if a windfarm was in operation, this navigation path would either require the FSO to exit the mining lease area in a northern direction and then circumnavigate the windfarm area to reach its offload area or would create a further impingement on the area in which a windfarm could be developed, constructed and operated. The FSO has capacity to carry 60,000 tonnes[8]. The exact dimension of the vessel is not clear within the application, however is expected to exceed 200m in length. Consequently, the area of such windfarm impingement could be significant.

61 Further, the repeated manoeuvring, docking and transferring operations of a vessel of this size, throughout a wide range of weather conditions and within a 3km wide area with windfarm infrastructure on either side would raise considerable concerns around safety risks in the event of loss of control or vessel failure. These considerations are likely to impact a windfarm project's risk profiles and therefore its insurance and financing.

Protecting windfarm infrastructure

62 During a windfarm's operational phase, all foundations and cables will be in place and there is a risk of asset damage due to the operation of or accidental damage from seabed mining activities.

63 During windfarm operation the main challenge to coexistence would be the offset distance between any offshore wind asset and the seabed mining activity. Turbine foundations rely on the underlying seabed for their stability, and turbine cabling relies on the overlying seabed for its protection. Therefore, any seabed mining activity that is to occur would not be able to risk a change in these conditions to the turbine or cable. It would be difficult to model these conditions with sufficient confidence to demonstrate how their coexistence could occur successfully, as described in the evidence by Mr King and Mr McComb regarding seabed mobility and hydrodynamics.

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6 Attachment 3a: Siecap - Pre-Feasibility Study part 1, section 9.3.1, FSO loading System.

7 Fast-track Act Application (April 2025), section 2.3.7.1.

8 Attachment 3a: Siecap - Pre-Feasibility Study part 1, section 9, FSO Offshore Operations.

Without high confidence that the risk could be managed, the financing of a windfarm coexisting with seabed mining is expected to be considerably challenging, if not impossible.

64 The risk of anchors damaging cables for an offshore windfarm is also a key design decision factor. Generally, for offshore windfarms global guidance is provided as to what activities can be conducted within the windfarm safely, and anchoring is discouraged via signage and markings on navigation charts. In certain jurisdictions, such as The Netherlands, vessel size limitations and restrictions on anchoring are provided by regulatory authorities.

65 If mining operations are to occur within close proximity of an offshore windfarm then the risk of anchor damage to cables would be considerably higher given the proposed anchor mooring approach associated with mining operations. TTRL propose that the IMV be moored on four anchors each extending up to 1 NM from the vessel,[9] which includes anchor spreads exceeding the mining area.

66 Vessel collision risk to turbines is another area where coexistence would change the risk profile for the windfarm project. The Proposal's offshore transfer of ore to bulk carriers[10] means a large number of international bulk carriers could be anchoring within close proximity to the windfarm,[11] although as identified above it is not clear where this may be and it could be as far as 70 NM from the Proposal site. During periods when there is adverse weather and these vessels are required to wait until offshore transfer can be completed, there would be an increased risk of a vessel drifting into the windfarm and damaging infrastructure. Similarly, emergency anchor deployment in a vessel drifting scenario could damage cable infrastructure.

Implications of a buffer zone for an offshore wind farm

67 Proposed Condition 37 (and the plan at Schedule 5 of the conditions) identifies a buffer area within which anchors and mooring lines for the IMV must remain. The condition at present creates an additional buffer zone around the proposed extraction area that will see infrastructure and vessel movements from the seabed mining activity extend further beyond the Proposal area and further impact use of the offshore wind resource.

68 As identified above, these buffer areas would exclude offshore wind projects from being able to install foundations or cables due to the risk of damage from anchors and the anchor handling vessels. With safety exclusion zones applied, a further 500m buffer on top of this

[9] Fast-track Act Application (April 2025), section 8.3.7.

[10] Attachment 3a: Siecap - Pre-Feasibility Study part 1, section 9.3.2, Cargo Vessel (Capesize) Loading system.

[11] Fast-track Act Application (April 2025), section 2.3.7.1.

buffer zone will further reduce the available site available for offshore wind.

Conditions

69 I note that TTRL's proposed conditions include a number of conditions to manage impacts on the existing Kupe Petroleum Mining Licence #38146 operator (*Kupe Operator*) (eg conditions 60, 67-68, 69, 87, 91, 93-95, 97-98, 101, 103-105). Amending those conditions so that they require engagement with or consideration of impacts on any offshore renewable energy feasibility or commercial permit holder would provide some (limited) mitigation of the impacts of the Proposal on offshore wind development.

70 However, compared to offshore wind, the Kupe operations are limited to a small amount of seabed infrastructure and a small amount of vessel operations. The potential location of offshore wind assets on three boundaries of the Proposal area also introduces significantly different navigation and safety risk considerations compared to the Kupe assets. As such, conditions required to fully mitigate the impacts of the Proposal on offshore wind development would be considerably more onerous than those proposed for the Kupe Operator.

CONCLUSION

71 For the reasons discussed above, my opinion is that the coexistence of an offshore wind farm and seabed mining on the same seabed is not feasible. Further, there is significant uncertainty in relation to whether activities could occur in adjacent areas. That uncertainty would present considerable challenges to the ability to successfully develop, fund, finance, construct and operate a commercially feasible offshore windfarm.

James Perry
3 October 2025