

**BEFORE THE ENVIRONMENTAL PROTECTION AUTHORITY AT
WELLINGTON**

IN THE MATTER of the Exclusive Economic Zone and Continental Shelf
(Environmental Effects) Act 2012 (“the Act”)

AND

IN THE MATTER of the applications by Trans-Tasman Resources Limited (TTR) for
marine and discharge consents to mine iron sand under sections 20
and 87B of the Act and

BETWEEN **Trans- Tasman Resources Limited**
Applicant

AND **The Environmental Protection Authority**
EPA

AND **Kiwis Against Seabed Mining Incorporated (KASM)**
Submitter

**SUPPORTNG MEMORANDUM OF EVIDENCE FILED OUT OF TIME ON
BEHALF OF KASM AND GREENPEACE**

Dated 22 May

Duncan Currie/Ruby Haazen
8 Mt Eden Road
Eden Terrace
AUCKLAND
rghaazen@gmail.com
Ph: 021-144-3457

MAY IT PLEASE THE DECISION-MAKING COMMITTEE

1. This memorandum seeks leave to file evidence out of time. Professor Elisabeth Slooten has provided evidence this morning reviewing the further evidence of Simon Childerhouse and Appendices relating to marine mammals and effects on marine mammals from noise.
2. Ms Slooten has been at the International Whaling Commission Scientific Committee. Professor Slooten attempted to get evidence completed by close of business on Friday 19 May but this was too difficult with multiple commitments. This was flagged to the DMC in our Memorandum of 16 May.
3. The evidence of Professor Slooten pertains to a topic which has been the subject of extension debate in this hearing and multiple further documents have been produced. Professor Slooten's evidence largely supports that of Mr Van Heldon, expert for Forest and Bird, but also provides a strong secondary opinion on some of the inaccuracies that has surfaced in the further evidence provided. In our submission this evidence should be given leave due to its relevance to the marine mammal topic.

Respectfully submitted.

DEJ Currie/Ruby Haazen

22/05/2017