

BEFORE THE ENVIRONMENTAL PROTECTION AUTHORITY

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

AND

IN THE MATTER of an Application under Section 38 of the Act for
Marine Consent by Trans-Tasman Resources Limited (TTRL)
in relation to the iron sand extraction and processing
application (the Application)

**JOINT STATEMENT OF EXPERTS IN THE FIELD OF
COASTAL STABILITY / PROCESSES**

Dated Wednesday, 15th February, 2017

INTRODUCTION

1. Expert conferencing of the Coastal Stability / Processes experts took place in person and by telephone on Wednesday, 15th February, 2017.
2. The conference was attended by
 - a) Dr Terry Hume
 - b) Mr Derek Todd
 - c) Dr Iain MacDonald
 - d) Bill Rainey (facilitator)

CODE OF CONDUCT

3. We confirm that we have read the Environment Court's Code of Conduct 2014 and agree to comply with it. We confirm that the issues addressed in this Joint Statement are within our area of expertise.

SCOPE OF STATEMENT

4. In our conference we discussed the issues relevant to the Application which arise within our field of expertise. Prior to attending the conference we each read the relevant parts of the Application, the evidence and independent reports prepared by the other expert(s) and circulated.
5. The issues are:
 - a) The need to update the beach profile record.
 - b) Impact of climate change on waves and currents.
6. In relation to each issue we discussed points of agreement and disagreement as follows:
 - a) While it was accepted by all that the impact of the sand mining operation will be extremely difficult to detect in the beach profile data (because of the large variability in beach profiles due to natural processes and the predicted small effect of sand mining at the shore), we agreed that beach profile monitoring be continued to extend the record of shoreline change and document variability during the mining operation. We agreed the monitoring of beach profiles be

added to the BEMP (Baseline Environmental Monitoring Plan) under proposed Consent Condition 14, and to the EMMP (Environmental Monitoring Management Plan) under proposed Consent Condition 20 with the methodology and frequency of monitoring being as described in para [13] of the rebuttal statement of Dr Hume.

- b) We agreed that climate change will not have a significant impact on the wave climate and currents in the South Taranaki Bight, particularly over the 20-35 year term sought for the consent.
7. In this Joint Statement we report the outcome of our discussions in relation to each issue by reference to points of agreement and disagreement relating to facts, assumptions, uncertainties and expert opinions / conclusions. We have noted where each of us is relying on the opinion or advice of other experts. Where we are not agreed in relation to any issue, we have set out the nature and basis of that disagreement.
8. We have also considered the draft consent conditions relating to our area of expertise proposed by the Applicant and have considered whether they are appropriate having regard to our opinions, should the Environmental Protection Authority grant the consents sought by the Applicant.

UNCERTAINTIES

9. We agree that the following mining operation matter requires clarification.
- a. The height of the mounds above the existing seabed at the start of the mining lanes - There seems to be confusing/conflicting statements in this regard from various witnesses in their rebuttal evidence with heights varying between 9m and less than 5m on average.
10. We agree that addressing the above matter would assist in improving the certainty of the mining operation.

MATTERS FOR THE DMC'S CONSIDERATION

- a. Environmental triggers and monitoring locations (if applicable)

Not applicable

QUESTIONS

There are none

CONDITIONS

11. We agree that the following conditions within our area of expertise would likely be both practicable and cost effective:
 - a. Note our statement concerning adding to the monitoring conditions referred to in para. #6 above.

References

12. We have referred to the following documents in our discussions:

Hume, T., Gorman, R., Green, M., MacDonald, I. (2015) Coastal stability of the South Taranaki Bight – Phase 2 Potential effects of offshore sand extraction on physical drivers and coastal stability. NIWA Client Report HAM2012-083: 135.

Signed:

Dr. Terry Hume: 

Mr. Derek Todd: 

Dr. Iain MacDonald: 

16 February 2017