

**Before the Decision-Making Committee of the Environmental Protection Authority
At Wellington**

Application for Marine Consent by Trans-Tasman Resources Ltd

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

AND

IN THE An application by Trans-
MATTER OF Tasman Resources Ltd for a
 marine consent application
 made to excavate iron sand
 from the seabed of the
 exclusive economic zone in
 the South Taranaki Bight,
 process that sand to remove
 iron particles and return the
 remaining sand to the
 seabed.

Kiwis Against Seabed
Mining Incorporated
(KASM)

Submitter

Further Evidence of Leigh Torres

On Behalf of Kiwis Against Seabed Mining Incorporated

Dated 15 March 2017

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Introduction

1. My name is Leigh Torres.
2. I prepared evidence dated 24 January 2017 (my “First Statement”) and rebuttal evidence dated 15 February 2017 and further information dated 6 March in these proceedings on behalf of KASM. The purpose of this evidence is to answer questions from the Decision-Making Committee raised in Minute 33 of 13 March 2017.
3. I have read the Code of Conduct for Expert Witnesses Environment Court’s Consolidated Practice Note (2014). In so far as I express expert opinions, I agree to comply with that Code. In particular, except where I state that I am relying upon the specified evidence of another person as the basis for any expert opinion I have formed, my evidence is within my sphere of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions which I express.

Sightings

4. Please find below my response to the DMC's following requests:

1) How many identifiable individual blue whales were sighted in the 9 survey days referred to in the transcript excerpt above:

i. within the 50 km radius of the proposed mining area?

Seven sightings of 12 individuals, including 1 calf.

ii. within the 60 km radius of the proposed mining area?

Nine sightings of 15 individuals, including 1 calf

(One other sighting was made of three individual blue whales at 61.1 km from the TTR site).

2) Please provide a map (similar to Figure 5 in your original written evidence) showing all the identifiable individual blue whales sighted over the 9 survey days referred to in the transcript excerpt above, and the relevant survey effort.

Please see the map provided below (Figure 1) that includes the locations of our blue whale sightings during the 2017 survey in the STB, and the location of the proposed mining site with a 50 km and a 60 km buffer around the site indicated. I am not able to display our survey effort as these data have not yet been processed. In order to provide our survey effort without also indicating where the vessel was when we were not on survey, we have to subset our vessel trackline data. This process takes a bit of time, which we are currently in the process of doing. In lieu of our survey effort trackline, I have plotted the locations where we conducted oceanographic sampling using a Conductivity, Temperature and Salinity (CTD) sensor. We conducted a CTD cast approximately every hour while on survey so these locations provide an approximation of where we surveyed. I can provide an update map with our survey trackline data in approximately one week.

Further Evidence of Leigh Torres

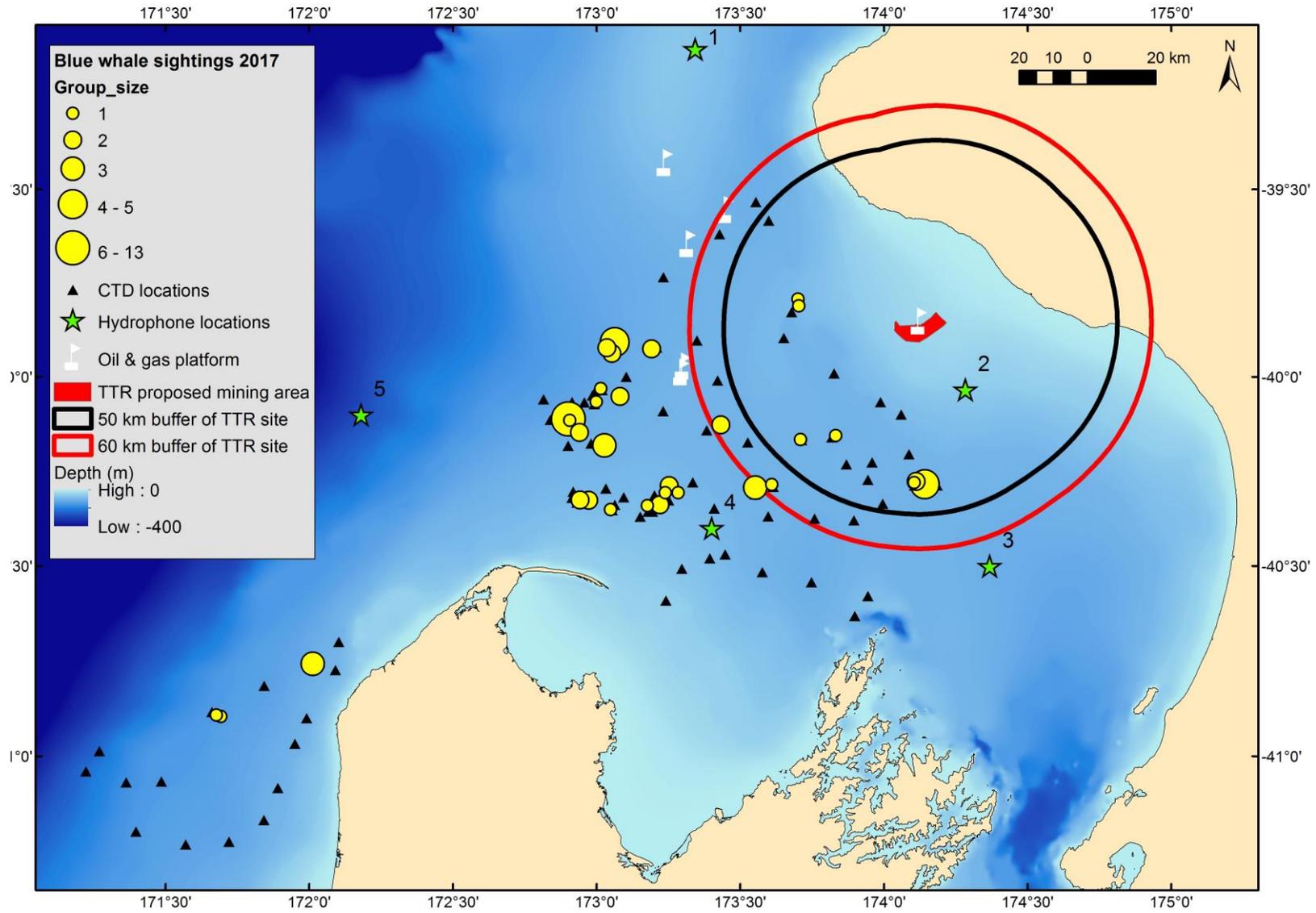


Figure 1.

Further Evidence of Leigh Torres

Leigh Torres

15 March 2017