

**BEFORE THE ENVIRONMENTAL PROTECTION AUTHORITY
AT WELLINGTON**

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

AND

IN THE MATTER of an application for marine consent under section 38 of the EEZ Act by Trans-Tasman Resources Limited to undertake iron ore and processing operations offshore in the South Taranaki Bight

BETWEEN **Trans-Tasman Resources Limited**
Applicant

AND **Environmental Protection Authority**
EPA

AND **Fisheries Inshore New Zealand Limited, New Zealand Federation of Commercial Fishermen Inc, Talley's Group Limited, Southern Inshore Fisheries Management Company Limited and Cloudy Bay Clams Limited**
Fisheries Submitters

MEMORANDUM ON BEHALF OF FISHERIES SUBMITTERS

Dated: 9th May 2017

Regarding further evidence for the Fisheries Submitters

Counsel Acting
ROBERT MAKGILL
BARRISTER

Instructing Solicitor
PETER DAWSON
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MAY IT PLEASE THE DECISION-MAKING COMMITTEE:

1. Counsel acts for the Fisheries Submitters.
2. Counsel refers to the Fisheries Submitters memorandum of counsel dated 5 May 2017 (**memorandum**).
3. That memorandum states at paragraph [11] that the Fisheries Submitters would advise on how they propose to address Trans-Tasman Resources' (**TTR**) new evidence by Tuesday 9 May 2017.
4. Counsel confirms the advice at paragraphs [8] and [9] of the memorandum that the Fisheries Submitters do not have the budget to instruct independent experts to participate in further expert caucusing.
5. However, counsel is instructed by the Fisheries Submitters that:
 - (a) Dr Jeremy Helson, an employee of Fisheries Inshore New Zealand Limited, is available for further expert conferencing within his areas expertise areas; and
 - (b) The Fisheries Submitters independent experts (Jacobs) have been instructed to prepare concise statements of evidence in reply to the information supplied by TTR, and within their areas of expertise, including:
 - i. Dr Greg Barbara;
 - ii. Mr Joris Jorissen;
 - iii. Mr Bruce Clarke; and
 - iv. Ms Helen Anderson.

Dated this 9th day of May 2017

A handwritten signature in blue ink, appearing to read 'R Makgill', is positioned above a horizontal line.

**Robert Makgill / Peter Dawson
Fisheries Inshore New Zealand
Limited, New Zealand Federation
of Commercial Fishermen Inc,
Talley's Group Limited, Southern
Inshore Fisheries Management
Company Limited and Cloudy
Bay Clams Limited**