

**Before a Decision-Making Committee  
Of the Environmental Protection Authority**

**EEZ100015**

**Under** the Exclusive Economic Zone and  
Continental Shelf (Environmental  
Effects) Act 2012

**In the matter of** an application for a marine dumping  
consent to dump dredged material at a  
deep-sea site east of Great Barrier  
Island

**By** **Coastal Resources Ltd**  
  
Applicant

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**4<sup>TH</sup> MEMORANDUM OF COUNSEL FOR COASTAL RESOURCES LTD  
REQUESTING TO QUESTION WITNESSES  
7 November 2018**

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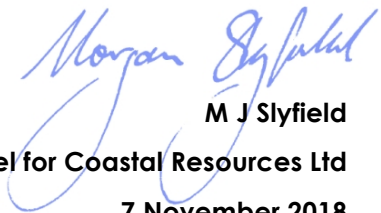
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**MAY IT PLEASE THE COMMITTEE**

1. In accordance with paragraph 66 of the Hearing Procedures, this memorandum requests the DMC to allow counsel for Coastal Resources Limited to question witnesses.
2. Such request is made on the basis of the evidence filed to date, which CRL's witnesses are reviewing. As CRL's witnesses continue with that review, these requests may be able to be refined. Refinement may also result from any witness conferencing that takes place. Estimates of time are tentative.
3. Against that background, CRL requests to question:
  - (a) Andrew Jeffs, in relation to effects on marine mammals and the suitability of the proposed conditions in relation to such effects, which is estimated to take 10 minutes;
  - (b) Clinton Duffy, in relation to potential conditions to address effects on ecology, particularly in relation to monitoring, which is estimated to take 15 minutes;
  - (c) Peter Longdill, in relation to his proposed additional conditions of consent addressing suspended sediment and other matters, which is estimated to take 20 minutes;
  - (d) John Riddell, in relation to his proposed amendments to potential conditions of consent, which is estimated to take 30 minutes.

  
**M J Slyfield**  
**Counsel for Coastal Resources Ltd**  
**7 November 2018**