

BEFORE AN EXPERT PANEL

FTAA-2504-1048

UNDER the Fast Track Approvals Act 2024

IN THE MATTER of a substantive application for marine
consents that would otherwise be
applied for under the Exclusive Economic
Zone and Continental Shelf
(Environmental Effects) Act 2012

BY Trans-Tasman Resources Limited

**MEMORANDUM OF COUNSEL FOR TRANS-TASMAN RESOURCES
LIMITED**

3 DECEMBER 2025



HOLM | MAJUREY

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1. Counsel seek leave of the Expert Hearing Panel to file a brief of evidence from Dr Alison MacDiarmid dated 3 December 2025.
2. This brief is limited to providing a clarification of one of the statements recorded in the Joint Statement of Expert Witnesses: Benthic Habitats and Species (17 November 2025).

DATE: 3 December 2025



Mike Holm / Nicole Buxeda / Morgan Slyfield

Counsel for Trans-Tasman Resources