

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 SEEKING LEAVE TO FILE ADDITIONAL EVIDENCE**

12 DECEMBER 2025




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MAY IT PLEASE THE PANEL

1. This memorandum on behalf of Trans-Tasman Resources Limited (**TTR**) seeks leave to file a further supplementary statement of evidence by Shawn Thompson.
2. TTR has become aware that in places the joint witness statements suggest that the processing of extracted seabed sediment aboard the IMV will create additional fines, and as a consequence the discharged tailings will contain more fines than the extracted sediments.¹ This is incorrect.
3. Mr Thompson's supplementary statement seeks to provide additional information about the comminution² processes, to correct any misunderstanding on this topic.

DATE: 12 December 2025



Morgan Slyfield / Nicole Buxeda

Counsel for Trans-Tasman Resources

¹ For example, the Fate of Tailings Backfill JWS at [14] describes the tailings as having "an indeterminant amount of fines added", and the Primary Productivity JWS at [57](a) records uncertainty about the "source" of ultra fines.

² See footnote 12 of TTR's VTM Application, 15 April 2025.