

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 ON DERIVATION OF BACKGROUND SSC
(IN RESPONSE TO PART OF MINUTE 13)**

9 November 2025



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MAY IT PLEASE THE PANEL

1. This memorandum responds on behalf of Trans-Tasman Resources Limited (**TTR**) to the 3rd requested item of information in Minute 13 issued by the Expert Panel.

Derivation of background suspended sediment concentrations in Schedule 2 of the proposed conditions

2. As requested, Mr Govier's statement of evidence (dated 15 December 2016) is filed with this memorandum. This includes Appendix 10 referred to in Schedule 2 of the proposed conditions, which is replicated below for ease of reference.

STB Sites	Background percentiles (SSC mg/L)			
	Surface		Bottom	
	80 th percentile - Response Limit	95 th percentile - Compliance Limit	80 th percentile - Response Limit	95 th percentile - Compliance Limit
Rolling Grounds	0.3	1.1	3.5	15.3
Graham Bank	1.7	4.5	32.8	84.0
Source A to Whanganui 1 km	1.1	2.7	16.9	44.2
Source A to Whanganui 20 km	2.3	5.9	29.0	76.6
South Traps	6.3	11.1	37.7	97.4
North Traps	7.2	12.4	46.5	115.0
Tuteremoana	8.5	13.6	23.7	62.5

3. As stated in Schedule 2 of TTR's proposed conditions, Mr Govier's Appendix 10 is the source of the numerical values of the levels of "naturally occurring" 80th and 95th percentile background limits contained in the table in Schedule 2.
4. Mr Govier's evidence references a number of documents which are already before the Expert Panel, each of which contributed some of the information that enabled the calculation of the values:
 - (a) The Oceanographics Measurements Report (**Supplementary Technical Package Report 12**);
 - (b) The Nearshore Measurements Report (**Supplementary Technical Report 13**);

- (c) The Remote Sensing Report (**Footnote Document FN36**); and
 - (d) The 2015 Sediment Plume Modelling (**Footnote Document FN102**).
5. Pertinent to the present inquiry, the measurement reports describe a range of measurements relevant to background SSC levels. For example, Report 12 describes:
- (a) methods for obtaining SSC measurements (instrumentation at 2.1.4, and deployment considerations at 2.2.3);
 - (b) locations (Table 3-2 and Figure 3-1);
 - (c) additional deployment information (Table A-4); and
 - (d) measurement results (at 3.6).
6. The data obtained from the various measurement reports was utilised to evaluate the sediment model, which is described in section 4 of the modelling report (**Footnote Document FN102**).
7. Following that evaluation, data was extracted from the model for each of the sites listed in Mr Govier's Appendix 10, and 80th and 95th percentiles were calculated from that data. (In section 5.5.3 the 2016 Impact Assessment, which set out an earlier version of the table, explained "these data were extracted from the predictive sediment plume models".)

DATE: 9 November 2025



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