

**FORM 13: SUBMISSION
ON AN APPLICATION FOR RESOURCE CONSENT
UNDER SECTION 96
OF THE RESOURCE MANAGEMENT ACT 1991**

Office
Use Only



PART A: DESCRIPTION OF APPLICATION

CONSENT NUMBER:

APPLICANT:

WCRC: RC-2023-0046 GDC: LUN3154/23	TIGA MINERALS AND METALS LTD
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DESCRIPTION OF PROPOSED ACTIVITY:

Establish and operate a mineral sands mine, including construction of associated infrastructure.

LOCATION:

Barrytown Flats, west of State Highway 6 (Coast Road), 9km south of Punakaiki township and 36km north of Greymouth.

PART B: SUBMITTER DETAILS

Full name/s	Clare Ann Backes and Keith David Morfett		
Postal address	[REDACTED]		
I am the owner/occupier (delete one) of the following property:	[REDACTED]		
Primary contact person/s	Clare Backes		
Email address	[REDACTED]		
Phone number/s	Home:	[REDACTED]	Business:
	Mobile:	[REDACTED]	Fax:

Signature of the submitter (or person authorised to sign on behalf of the submitter):	Date:
[REDACTED]	11/10/2023
Name (BLOCK CAPITALS):	
CLARE BACKES, KEITH MORFETT	

If this is a joint submission by 2 or more individuals, each individual's signature is required. A signature is not required if you make your submission by electronic means.

- I/we **support** the application numbers indicated by a tick on the back of this form
- I/we **oppose** the application
- I/we **neither support nor oppose** the application

(tick one)

(tick one)

I/we **wish to be heard** in support of my/our submission.



I/we **DO NOT wish to be heard** and hereby make my/our submission in writing only.



If you wish to be heard, and others make a similar submission would you consider making a joint case with them at any hearing

Yes

No

If you indicated you wish to be heard, you will be sent a copy of the S.42A Officer's Report and a copy of the Decision once it is released. Please indicate below which format you would like to receive these documents in:

Electronic (CD) copy

Hard (paper) copy

I/we **have** served a copy of my/our submission on the Applicant as per Section 96(6)(b) of the RMA

Yes

The specific parts of the application that my submission relates to are: *(give details)*

all of the application

See submission below

My/our submission is that: *(include whether you support or oppose the application or specific parts of it; whether you are neutral regarding the application or specific parts of it; and the reasons for your views).*
see below

I/we seek the following decision from the Local Authority:(give precise details)

Decline the application in its entirety

I am/am not* a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

*Select one.

* ----

*Delete this paragraph if you are not a trade competitor.

†Select one.

I request/do not request*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

*select one.

Important information – Please read carefully.

Submission

We oppose this application for a number of reasons, including the following:

1. Detrimental Effect on community well-being and amenity values.

The stretch of SH6 between Westport and Greymouth is a superb landscape – a connected landscape with views to the bush, the sea, rural pasture and hills which transition into mountains. Indeed, many parts of it are identified in the Grey District Planning documents as having Outstanding Natural Features and Landscapes which can be adversely affected by development pressures. The traffic pressure on the road will destroy the appreciation of the landscape both north and south of the proposed mine.

There will be affects due to noise, lighting, dust, vibration and processing plant movements. If you live in the vicinity of the processing plant which is in operation 24/7, even if it keeps to the standard noise level limits, it will mean that you are subject to a continual drone in the background, and that can be very bad for mental health.

People have moved to Barrytown and surrounds due to the peaceful non-industrial nature of the place; the mine will destroy the ambience of the area. Already the very idea of this mine has caused great stress for many of the local residents, as they look forward to a possible future where mining and trucking dominate their outlook on life. This will also depress house prices which means that people get stuck in their current homes as they cannot afford to buy anywhere else. And so amenity and well-being both suffer.

2. Increase in effects on climate change, and area made more vulnerable to effects of climate change

There would be a huge increase in emissions, from both the trucks on the road and heavy equipment on site, as well as the actual mining and processing areas. 2 dozers, 1 grader, 3 front end loaders, 4 integrated tool carriers, 3 artic trucks, 2 excavators and other mining equipment and vehicles are proposed to be used – these are all emissions intensive. This at a time when the world is on a path to catastrophe from ever increasing temperatures: *This was the hottest September on record, following the hottest August and the hottest July. It beat the previous September record by 0.5C, the largest jump in temperature ever seen. (Guardian.com Oct 5th 2023)* This kind of enterprise should not be allowed, we must cut our emissions, not increase them.

The lower final landform will be more subject to flooding by the sea, giving less protection to both the surrounding residents and SH6. The low-lying flats are already susceptible to sea inundation under rising sea levels brought about by climate change: we must not encourage flooding in the Barrytown Flats area by allowing this destruction of the land. This would also adversely affect the groundwater.

3. Decrease in Road Safety

This is a well-travelled but narrow and winding road, oftentimes with one-way areas due to slips on the road. Allowing 50 truck movements a day, either north or south will make it very unsafe for cyclists, tourists who are often not used to rural roads, and to locals who will have to negotiate the road at the same time as the trucks. Note also the 50 is an average, there may be days when there are many more truck movements than this. There will be more accidents with all these truck movements.

The days of the Coast Road being an amazing drive will be over, instead many will choose to go inland and miss the stunning coastal views. This will damage the local tourism industry and all the local people who make their livelihood from it.

4. Adverse effects on Local Ecology

Although the coastal lowlands are somewhat degraded, there is an opportunity to restore them into a functioning ecosystem. This mining project will further destroy the ecosystem which will not be able to heal. Restoring the land to poor quality pasture, at a lower landform level is not a progressive outcome.

The noise, lighting, dust and vibration could adversely affect birds such as bittern (threatened, vulnerable).

There will be increased sedimentation in any streams which will alter the hydrology and ecology of the streams, and this will also adversely affect any fish that live there.

The Westland Petrel (vulnerable) or Taiko will be adversely affected by the number of truck movements. Trucks will have their lights on as this is a narrow winding road, at times very dark in the shade – with more traffic on the road it is more sensible for drivers to drive with headlights on. The headlights will attract the taiko which crash on the road, and die. This is a petrel species only found on the West Coast, we must not threaten its survival anymore.

5. The adverse social and environmental costs outweigh any economic gain.

This is a majority foreign—owned company and so any profits will go offshore. But the adverse effects on both the social fabric and the environmental costs will be significant, and so there will be no economic gain for the local area, just a few jobs for some, whilst others will lose their livelihood in tourism and their piece of mind due to living in an active mining zone.

Even the increased traffic on the road will have detrimental effects on the local economy, not least because the road will need many more repairs which will be a cost to New Zealand through the NZTA/Waka Kotahi.

It cannot be argued that this a strategic resource –titanium dioxide is used as a pigment for paint and paper, garnets are for industrial abrasion and zircon for ceramics. These minerals are produced in other places, we do not have to destroy part of the West Coast to satisfy this demand, at the expense of the local economy in favour of a foreign owned company.

6. Adverse effects on the water courses

The Toxicant Management Plan is inadequate. There is no certainty on what will be leached from the area during the mining process, it is highly likely there be heavy metal contamination of the nearby water bodies. Any excess water will enter the creeks and likely cause contamination.

7. Contamination by radioactive elements.

The radiation assessment seems to depend on one sample from 2002, and a later undated one. This is totally unacceptable. The average grade assay returned a concentration of 2ppm for Uranium yet the more concentrated high grade assay shows 0ppm Uranium. Both the paucity of samples and the anomalous Uranium result strongly suggest that the radiation assessment is woefully inadequate.

8. The proposed TTPP plan cannot be used to justify the mining in this area.

The Mineral Extraction Zone proposed under the TTPP plan for this area cannot be used as a reason for allowing the mining to take place, as this plan has not been approved and will be subject to much litigation through the submission process before the plan comes into effect, and it will likely be an amended plan that does come into effect.

9. It is contrary to the RMA

RMA section 7 instructs that particular regard should be paid to

- Kaitiakitanga;
- the ethic of stewardship;
- the efficient use and development of natural and physical resources:
- the efficiency of the end use of energy:
- the maintenance and enhancement of amenity values:
- intrinsic values of ecosystems
- maintenance and enhancement of the quality of the environment:
- any finite characteristics of natural and physical resources:
- the protection of the habitat of trout and salmon:
- the effects of climate change.

Clearly the proposed activity contravenes many of these regards in relation to the use, development and protection of natural and physical resources.

We ask that this application be declined in full.

Clare Backes and Keith Morfett