

**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

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	Tammy Ward			
Postal address	[REDACTED]			
I am the owner of the following property:	[REDACTED]			
Primary contact person/s	Tammy Ward			
Email address	[REDACTED]			
Phone number/s	Home:	N/A	Business:	N/A
	Mobile:	[REDACTED]	Fax:	N/A

Signature:		Date:	13 October 2023
Name (BLOCK CAPITALS):	TAMMY WARD		

*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/
- I **oppose** the application
- I/we **neither support nor oppose** the application

(tick one)

(tick one)

I **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

Have you not heard of Dropbox, Sharepoint, We transfer! Lots of better options than printing!!

Why is this the only electronic option?? Most computers don't even have CD drives!

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

 Yes

My/our submission is that: (state in summary the nature of your submission. Clearly indicate whether you support or oppose the specific proposal, or wish to have amendments made, giving reasons)

I strongly OPPOSE the application and my reasoning is attached in a separate document.

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

That the application be DECLINED in its entirety.

**Important information – please read carefully**

**Public information**

The information you provide is public information. It is used to help process a resource consent application and assess the impact of an activity on the environment and other people.

Your information is held and administered by the West Coast Regional Council in accordance with the Local Government Official Information and Meetings Act 1987 and the Privacy Act 1993. This means that your information may be disclosed to other people who request it in accordance with the terms of these Acts. It is therefore important you let us know if your form includes any information you consider should not be disclosed.



**THE WEST COAST**  
REGIONAL COUNCIL

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**SUBMISSION AGAINST - TiGA Minerals and Metals Ltd - WCRC: RC-2023-0046,  
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I Tammy Ward, make the following submission against the above resource consent application.

**I oppose the application due to adverse effects on amenity values and on community wellbeing.**

I came to live in Barrytown because of the aesthetic values of the area. There is a real visual connectivity between the beautiful bush-clad hillside that is the backdrop of the township, to looking out over the pastures and forest remnants out to the sea. The views here are expansive, the night skies are dark, and star filled and we have long periods of quiet. All of this provides for a calming effect which in today's world is often hard to find.

The social, economic and cultural well-being of this community is now under threat from an industrial activity that wants to set up shop on our doorstep. This is a rural area, not industrial and many residents here don't seek highly paid jobs but prefer to work in low-impact enterprises. Many here, including myself, value the natural environment we have. I value the rural lifestyle this area provides, the peace and quiet and relative isolation. Creating a large-scale industrial activity here will destroy all of that. Degrading the amenity and wellbeing values will likely degrade the property values as well. I also note that TiGA have submitted on the proposed Tai Poutini plan to make this entire area a Mineral Extraction Zone. This shows little care or concern for the people who live here.

The amenity values are a big part of why I live here. Having to listen to heavy trucks rumbling along the highway every 15 minutes 7 days a week and the constant background drone of machinery and equipment would seriously impact on my mental wellbeing.

**I oppose the application due to adverse effects on the area's hydrology, waterways, ecology and ecosystem impacts**

I am concerned that the proposal will result in the leaching of contaminants and heavy metals back into the coastal lagoons and freshwater sources due to the close proximity of the mine activities. This is a fragile environment and even a small amount of contamination could adversely affect the flora and fauna that currently cling to the life-giving waters.

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Local residents use this water as well and I am to understand that there are natural springs which could be severely affected by TiGA taking too much water from the streams or digging too deeply into the water table. Each year I see residents have to truck water in to fill their rain tanks, so it leads me to ask, how can this proposal be seen as a proper use of the freshwater sources that are here? We do have drought times here, yet instead of locals being able to use the creeks to collect water, TiGA will be allowed to pump it into a mine pit, then try to treat it with chemicals before reintroducing it back to the creek and lagoons.

I am uncertain that the measures they propose will result in 'clean' water discharges. I have concerns over the settlement ponds and how they will be designed so that no leaching of heavy minerals or other contaminants are able to enter the groundwater or freshwater streams & lagoon. The Western Mineral Sands mine newly established north of Charleston, has recently had an issue with just that. The settlement ponds discharged contamination because they apparently did not perform the way the company thought they would. With this mines close proximity to the streams, lagoon and coastal marine area, a discharge here could be devastating.

Surely these ponds will accumulate toxic sludge over time, so how will TiGA manage that and ensure the ponds don't leach. And if they dig out the sludge from the ponds to make them more efficient, what will they do with it? I questioned Mr Berry at a public meeting about my concern with the settlement ponds, he said there is nothing to leach, it's just water.

TiGA also states that they will monitor all of this themselves. I do not agree with this approach and believe that this level of water management should be monitored by a professional independent body.

The application also states that there will be a water take from Canoe Creek. I questioned this with Mr Berry and he told me they would not be taking water from the creek as there was enough ground water to work with. However, the Water Assessment Report clearly states they will be taking from Canoe Creek to start operations and may need a take to augment flows in Collins Creek. If this is the case, then any conditions of consent should include 'stop take' parameters.

The Erosion Sediment Control Plan states that "aquatic species present represent a reasonably intact freshwater fish fauna" (pg8 2.3) and the Ecology Assessment (pg46 6.7) agrees, and states Collins Creek and Canoe Creek are of high ecological value.

So even though this is a highly modified area with limited ecological values due to previous land uses, the land is recovering, and aquatic life are calling it home. Any

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discharges to these freshwater streams could adversely affect the fauna that now survives here.

**I oppose the application due to adverse effects on the Tāiko / Westland petrel**

The proposed southbound trucking hours of 5am to 10pm include hours of darkness for all months of the year, so they will not protect the petrels from road injuries and fatalities as a result of headlight distraction. Petrels do not always fly directly west out to sea, they are known to also follow the coastline, and the risk remains they could be confused by headlights especially along sections of the Coast Road close to shore. There is also the possibility of light distraction from the processing plant which will operate all night long. The lights of the buildings along with any vehicles moving around is an extra layer of risk.

These birds are a threatened species and have a very slow reproductive rate which means that losing even a few of them can greatly affect their breeding potential. They are already challenged by the effects of climate change which impacts on the abundance and distribution of food sources and may impact on breeding success.

This proposal has the potential for unacceptable cumulative effects on the Tāiko population and is inconsistent with the requirement of Policy 11 of the New Zealand Coastal Policy Statement to avoid adverse effects on threatened or at-risk indigenous species and their habitats. As this stretch of coast is the only place these birds live, the loss of even one bird is unacceptable. The mining activities should not occur during any hours of darkness.

**I oppose the application due to potential adverse effects of radiation.**

TiGA has submitted a radiation report, which essentially talks about 2 samples of ore, one being from over 20 years ago. The applicant has also provided a Dose Report, which contains 2 lines of information that make no sense as there is no background information as to what the references are measuring, or where the measurements have been taken from.

Essentially, they claim to have had radiation tests done yet there are literally no specifics at all in the reports to identify where the samples were actually taken from, other than to say it is 'ore from the Barrytown site'. This is an inadequate basis from which to make a decision on the radiation content of the heavy mineral concentrate (HMC) coming from the site.

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The Applicant points out in their proposed conditions of consent (ATT P 8.6) that New Zealand has no Code of Practice for handling these radioactive materials and thereby proposes to use an Australian Code of Practice. Australian standards are inappropriate for NZ environmental conditions. There is the potential for adverse effects of radiation on people and the environment and the level of risk is unknown due to inadequate information. I also note they have proposed conditions for constant radiation monitoring of the site and personnel. Therefore, they are acknowledging this as a significant risk to manage.

I believe there should be some solid, independent review information about the radioactive levels of the site and what radioactive levels will be created by the processing prior to the consent being granted. TiGA have indicated at a public meeting that they will be seeking to further process the HMC. This could increase the radiation risks, but where this processing might occur has not been determined.

I also have concerns about the 'Dry Mining' method they propose to use for panels 9, 10 and the stockpiled ore ( pg 16 of the AEE). If material is dry this would seem to pose a risk of radioactive dust being blown off the site. As the wind is always blowing here, and in multiple directions, this would need to be carefully controlled.

Overall, I don't believe the radiation reporting and mitigation measures provide enough detail to ensure proper process, and an independent review should be undertaken. I also feel that the monitoring of the site should be done by independent properly qualified experts, not left up to the mining company or Council officers.

The impacts this proposal will have on the environment, local businesses and the community are more than minor and I ask that serious consideration of these impacts be given

I ask that this application be heard and decided on by independent commissioners not the Council.

I seek that the application be **declined** in its entirety.