

**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	Fiona McDonald		
Postal address	[REDACTED]		
I am the owner/occupier (delete one) of the following property:	Owner		
Primary contact person/s	Fiona		
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:
Fiona McDonald	[REDACTED]
Name (BLOCK CAPITALS):	
Fiona McDonald	

*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

 I will as soon as possible after submitting this to council

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


Transport, wildlife, waterways, public health,
environment concerns and more.

See attached.

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).*
oppose

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

The application be declined in its entirety


I  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  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.

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 and Grey District 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.

I DO NOT WANT Any of my personal or contact information to be disclosed to anyone

West Coast Regional Council 388 Main South Road, Paroa, Greymouth 7805 PO Box 66, Greymouth 7840 Telephone (03) 768 0466 Toll Free 0508 800 118 Facsimile (03) 768 7133 Email info@wcrc.govt.nz Website www.wcrc.govt.nz	Grey District Council 105 Tainui Street PO Box 382 Greymouth, 7840 planning@greydc.govt.nz 03 769 8600
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Note to submitter

If you are making a submission to the Environmental Protection Authority, you should use form 16B.

The closing date for serving submissions on the consent authority is the 20th working day after the date on which public or limited notification is given. If the application is subject to limited notification, the consent authority may adopt an earlier closing date for submissions once the consent authority receives responses from all affected persons.

You must serve a copy of your submission on the applicant as soon as is reasonably practicable after you have served your submission on the consent authority.

If you are a trade competitor, your right to make a submission may be limited by the trade competition provisions in Part 11A of the Resource Management Act 1991.

If you make a request under section 100A of the Resource Management Act 1991, you must do so in writing no later than 5 working days after the close of submissions and you may be liable to meet or contribute to the costs of the hearings commissioner or commissioners. You may not make a request under section 100A of the Resource Management Act 1991 in relation to an application for a coastal permit to carry out an activity that a regional coastal plan describes as a restricted coastal activity.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious;
- it discloses no reasonable or relevant case;
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further;
- it contains offensive language;
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

The Coast Road is home is a resilient and diverse community, many of which have chosen to live here because of its wild and beautiful environment.

I will cover

- This one road
- The Taiko
- The Korora
- Noise
- Radioactivity concerns
- Road accidents
- Tourism
- Wetlands- Tuna population
- Lowering of land
- Summary

ONE ROAD

I have no doubt this operation will have negative effects on the mental health and wellbeing of members of this community, many of whose homes lie within a stones throw of this fragile and vulnerable highway. Who's entire lives and lives and wellbeing of their children rely on this single solitary road in and out of our region.

This is not like your regular community with other points of access and different routes to get to and from the activities of their daily lives. There is one road only, and it is vulnerable to slips, washouts, coastal erosion, accidents and many other risks already.

This one road services not only all our people, but all of the visitors to this region.

This one road also already poses significant risk to wildlife in this region with the existing traffic flow, and the risk should not be increased.

The traffic report does not even touch on the effects of the traffic flow on local wildlife other than the Taiko, I would like you to consider this.

TAIKO

The likelihood of adverse affects on the Taiko is well documented, and I put it to you that the extra death of even one bird of this precious species, one Taonga, due to this activity being permitted, is one death too many.

There is only one known colony, IN THE WORLD of this species. How could a mine be allowed to operate right in its flight path?

Who are we or you to decide it is okay to increase the potential mortality and disruption to this naturally uncommon species by allowing a major industrial site within a stones throw of their only prehistoric nesting environment?

In the case of the Taiko, how on earth can we rely on the open and honest reporting of the mine management to bring us the full truth on what they are experiencing in this mine site. It would be in their interests to keep this information to themselves! How could we expect and know we are getting open and honest continual reporting?

KORORA ROAD FATALITIES OVERLOOKED IN THE AVIAN REPORT

I would like to raise awareness about the Korora and the timing of the proposed trucking.

I have read the Avian Management Plan and the Mine transport assessment, and although the Avian Management plan mentions the possible presence of Korora in and further out than the tested area, it neglects to mention the increased risk of death by vehicle, to the Korora up and down the Coastal highway.

It is inconsistent with the requirements of Policy 11(a) of the New Zealand Coastal Policy Statement (NZCPS)

I spent the best part of ten years between 2000 and 2010, recording the deaths of Korora in my vicinity and found around about 100 Korora over this ten year period deceased on the highway after vehicle collisions. The avian report has not even touched on this.

In three high risk areas, we now have a penguin proof fence prevent accidental casualties on the highway. This has proved invaluable in saving these local populations, and seems the only way to stop these fatalities. However with the continual erosion of the Coastline up to the highway, the problem is fast becoming how to get the Korora across the road into safe nesting territory further inland.

The timing of the proposed trucking is-

- Three movements per hour between 5am and 7 am North or South
- Movements between 5 am and 10pm to the South
- 30 minutes before and after sunset to the north.

- This clearly runs into the timing in which the Korora leave their burrows and cross the highway up and down the Coastal highway to go out to sea. Also when they return home from sea to return to their burrows.
- This occurs later in the morning and earlier in the evening during the winter months with shorter daylight hours and is clearly during the hours of trucking operations at all times of the year.
- This activity generally happens just before sunrise and just after sunset. IE when trucks will be travelling this coastal route. If there is a Korora crossing the road in a trucks path, there is nothing they can do to prevent hitting it. This species has suffered so much damage already on this Coast road, we would be remiss to allow it to suffer further. I have scraped up countless Korora or little blue penguins from this coastal highway and watching what we have done is heartbreaking over and over again.
- The Korora has been drastically overlooked in this report yet they are one of our most affected species on this coastal route, they literally must cross the road to rest, and as coastal erosion eliminates old habitat, the Korora need to cross the highway more and more frequently to find somewhere to establish new breeding grounds.

I put it to you, that this entire issue has not even been touched on in any of these reports. The awareness is not there. The risk to the remaining Coast road population of this species is two great. This is not a minor detail. There is a responsibility to preserve another already at risk species from local extinction.

Life on this highway is a fraught existence for so many species on this Coast, we have a duty to protect this wildlife. Mitigation on the site has been discussed, but what about the unseen casualties? What about all the other birdlife that gets killed on the highway and how much this will increase. There is no way of measuring this, but it is a given, it will happen, and we will never know the true cost. But if this goes ahead there will be blood on the hands of the people responsible. Blood of lost wildlife and possibly even blood of humans who have lost their lives as a result of industrial trucking on the fragile and dangerous Coast road. This highway is not the place for a major industrial trucking operation.

I put it to you that if this does go ahead, the mine is required to make ongoing substantial financial commitment to the rehabilitation and survival of the Korora on this Coastal route. The risk to this species exists whether the route were to go north or south.

-NOISE

The constant noise and vibration will have a serious impact on the mental health of those living along the trucking route. Look at the recent example of what happened in Westport. With the Westport bar being closed, trucks containing the mineral sands were trucked through Westport and up to Nelson. I have personal experience with a person living along this trucking route, who was exhausted at the relentless noise and vibration of the trucks going past her house every 20 minutes, without pause. She eventually had to leave her home and go elsewhere to have a break as she could get no break in her own home! HOW IS THIS FAIR?

-RADIOACTIVE HEALTH CONCERNS

There is inadequate research done on the potential for serious health problems due to exposure to concentrated radioactive minerals. The spreading of potentially concentrated radioactive mineral sands through airborne dust up and down the length of the mining area and the proposed trucking route is a huge risk to the health and wellbeing of this community. Why should the members of this community be subjected to such potentially toxic dust in their homes, gardens and natural environment? A price for a whole community to line the pockets of a few.

It seems that water as a dust suppressant may not work-

Please look at information quoted by John Hill in a recent article (RNZ 30 March 2022)

<https://www.rnz.co.nz/news/ldr/464291/mucky-sand-mining-project-in-buller-worries-councillor>

It pertains to the mineral sands mining in the Cape Foulwind area, where he explains that

“Westland Minerals Sands plan to use water as a dust suppressant at the site was problematic unless chemical enhancers were used to permeate the dust, he said. Water alone was “useless” Which then introduces the issue of chemical enhancers being introduced into this fragile coastal environment.”

Has this been researched for this site? Is it also the situation here that water alone is not enough to suppress the dust? If so does it need chemical enhancers? The then introduction of chemicals into this fragile ecosystem?

Has the actual cumulative effects of concentrated potentially radioactive dust on the local population been thoroughly investigated and proven to be safe for people who live in this community? Especially people living in the immediate vicinity of the mine, who’s lives will be altered irrevocably by this activity.

-ROAD ACCIDENTS

Increased risk of serious and fatal accidents for both locals and tourists alike

I have a question, who will pay the price of the above? There is a social cost and a financial cost to permitting this activity in this region. It won’t be the owners of this proposed Mine sitting tight in their own homes and communities elsewhere. It will be the residents of this district, the flora and fauna whom call this place home

Will the mine owners feel a responsibility to the family of anyone who may lose their life as the result of all these heavy vehicle movements. Or will they remain unaffected?

The young people that grow up on this road and in this community and have to do their early years of gaining experience driving, are not able to drive elsewhere on the roads. No one can. This is our one and only route in and out of this district. It is dangerous, vulnerable, winding and completely unsuitable for this type of permitted activity.

-TOURISM

Why would we risk the reputation and beauty of a highway that has been named one of the ten most beautiful highways in the world. People travel from all over the world to experience the beauty and unique environment of this coastal route. We can gain revenue from it over and over again, without any need for destruction of it. How do you think this activity will affect the reputation of this coastal route, once it comes to light that it has become a heavily industrialised trucking route with dangerous radioactive mineral sands airborne along the route itself? Social Channels are used widely and heavily by travellers in this current world. It will not take long before it is common knowledge that the Coast road is not what it used to be, and is no longer a safe and stunning coastal drive, instead an industrialised heavy trucking route with dangerous radioactive airborne dust to be inhaled by those willing to travel it.

-WETLANDS - Birds, Tuna (eels) and other aquatic life

Mining is proposed to come within 20 mtrs of wetland habitat which are a crucial part of this fragile ecosystem. They are habitat to a huge amount of our avian population, and I myself have witnessed Kotuku, Spoonbill, Dotteral, Stilts, Torea, Herons, Gulls Terns, Ducks, Fernbird, just to name a few. There are many many more.

Nobody really has any idea how this activity will actually affect these wetlands in the long run. I do not believe monitoring and mitigation measures that this company is proposing to undertake will provide the required protection to these vulnerable and at risk species. Run off from mining activities and concentrated toxic materials will end up in this environment and we may well lose yet more precious wetland habitat in this country.

The affect of these activities on groundwater levels and hydrology is not known and can not be predicted.

Tuna (eel) have been rescued by us on this part of the Barrytown beach after changes in groundwater levels meaning they were left high and dry. Who is to say the proposed activity will not cause more of this type of outcome?

The tuna population and the effects on them have not even been discussed in the reports from my observation? I have seen no mention of them?

Now is the time for us to be preserving our coastal and marine environments, not allowing the actions of a few to potentially destroy crucial and critical habitat for the endangered wildlife that remains.

-Removal of material

The result of overall lowering of the land makes no sense in a world where climate change and sea level rise is real! We have already experienced an increase in severe weather patterns in the past decade and as we all know, the turbulent weather patterns are becoming more frequent. How will TIGA be able to control what happens with the material, equipment, and pollutants in the event of a major storm event like we have had on several occasions in the last few years.

(Citing Cyclones Ita, Fehi, and Gita)

Leaching and other hydrology concerns may well end up more than the company is capable of dealing with. Inundation of the lower lying land seems inevitable. Especially when the land elevation will be reduced by 1.2 metres. This will fundamentally change the nature of this part of the Barrytown flats.

Years of ongoing issues regarding concentrated radioactive mineral sands seems like it could be a real threat to the lifestyles and livelihood of those that live here, and I mean flora, fauna and human.

What will happen if there is a toxic dump site left that leaches into waterways exacerbated by earthquake and or rising sea inundation?

Our personal activities / buildings land use etc are heavily restricted in this area, to allow this activity would seem to be pandering to one part of society and not the other?

In summary-

To allow this mining activity to go ahead would be a great injustice to the people and the environment of this very precious coastal area.

The potential for damage to the fragile coastal environment and its people is too greater risk to bear.

There are many issues not even addressed adequately in the reports, such as

- The effects of trucking on Korora
- The effects on the tuna population
- The effects of radioactive material on the people
- The effects of noise pollution on the people both near the mine and on the trucking route
- The effects of overall lowering of the land level in the Coastal environment
- The potential for loss of human life due to increased large industrial vehicles on the road
- Actual and real effects on the rare and at risk wildlife of the region.

How can the any of the effects of this proposal be considered as less than minor?

Who is going to pay the actual cost on the environment, our roads, our people and our wildlife? It is the people that live here and the wildlife.

No destruction of our landscape can be considered minor this can not happen for short term profit of a few individuals