The Consents Department
West Coast Regional Council
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Via email: info@wcrc.govt.nz

## RE: SUBMISSION IN OPPOSITION TO THE TIGA MINING PROPOSAL AT BARRYTOWN

My name is Diana Rossiter and I hold a Bachelor of Science and a Master of Science, with first class honours, from the University of Canterbury. I have lived in the Westport area since 2006 and have 25 years professional experience in the fields of environmental management, research science, community engagement and strategic community development.

I hold community governance positions on the:

- West Coast Tai Poutini Conservation Board (Board member),
- Kawatiri Nature, Environment and Communities Trust (Deputy Chair), and
- Westport South School Board (Co-Chair).

I represent the Buller District Council on the Kotahitanga mō te Taiao Alliance, through which I have been exposed to Te Ao Māori wisdom, and lead the Buller district's climate adaptation project for Buller Kawatiri communities. Although I have these connections and affiliations in the district, this submission represents my individual views only, but have provided evidence of my experience and associations to support my submission.

My submission is in full opposition to the proposal and application for resource consent from the Grey District Council and West Coast Regional Council from TIGA for the mining of mineral sands at Barrytown, for three reasons:

## 1. Adverse Effects on the Regional Economy

An economic impact report was provided with the application to demonstrate positive economic effects and benefits associated with the proposal. I note that the author is a highly qualified economist and I am not questioning his analysis or assessment. However, I do question the overall conclusion drawn from the analysis that the proposal will have positive economic effects on the regional economy. I disagree that the effects will be positive, enduring, and/or felt regionally and locally and provide the following argument to support my position.

Since post-European times, the West Coast's economy has been founded in an extractives approach – most well-known extractives examples are gold, coal, timber, and now mineral sands. The extractive sector takes an exploitative approach to produce goods which are sold at a profit, and there is a school of thought that the West Coast's extractives approach provides for local economic and community prosperity. However, I would like to challenge this perspective, for two reasons:

i. The extractives approach extracts wealth (in the form of profit, finite natural resources, and local labour) from local communities to the benefit of shareholders often outside of the region, and in this instance, outside of the country. When company head-offices are not established locally, opportunity is lost for local people to grow into leadership roles and develop leadership skills that are vital for the wellbeing and prosperity of isolated, rural communities. In fact, the extractives approach (in the absence of genuine community development strategies and investment) takes away opportunity from local communities to invest in their long-term development, by keeping the local workforce employed in lower value roles with less decision-making responsibility and opportunity.

ii. Secondly, the boom-and-bust cycle, which is inherent to an extractives approach, has created local and regional economic instability and driven significant poverty and socio-economic deprivation challenges in our local communities. If the extractives approach is so positive for regional economies, why does the West Coast (and the Buller district in particular) have the highest level of relative socio-economic deprivation in the South Island? To illustrate this point, in 2013 when international coal prices 'went bust' Stockton Coalmine haemorrhaged hundreds of jobs and the consequences for the Buller district saw it move from a socio-economic deprivation index of 5 (aligned with the average for Aotearoa) to 9 (with 10 being the most deprived) (Figure 1).

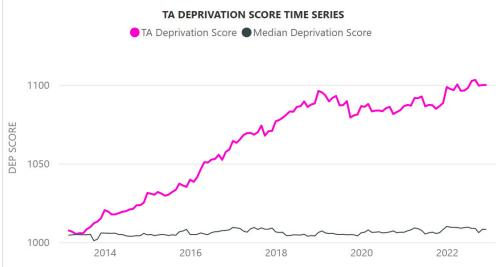


Figure 1: Buller district relative socio-economic deprivation change 2013 to 2022 (in pink) against the national average (black)<sup>1</sup>.

If TIGA gains consent, when its operation concludes following 12 years of operation, the West Coast's local economy will again be destabilised as we (the West Coast) will need to adjust to another 'bust' cycle. In the interim we will have, yet again, postponed the development of more enduring local and regional economic prosperity, our resources will be more depleted, our natural environment will have been adversely impacted, and our Wild West Coast image will have been significantly compromised.

The economic assessment asserts that international tourism has declined post-Covid, and that the TIGA proposal will help fill the gap whilst the international tourism market recovers. I am involved in a project, supported by funding from MBIE's Tourism Innovation Fund and involving Development West Coast, The Mokihinui-Lyell Backcountry Trust (responsible for The Old Ghost Road), the Charleston to Westport Coastal Trail Trust (responsible for the Kawatiri Coastal Trail), and KNECT,

<sup>&</sup>lt;sup>1</sup> DOT Loves Data

looking into the feasibility and strategic development of regenerative tourism in the Buller district. I am concerned that the significant increase in heavy truck movements up and down the coast road (which is an internationally recognised wild West Coast experience in itself) will adversely impact the future of tourism in the Buller district, and potentially the rest of the West Coast.

I therefore believe that any temporary economic benefit associated with the proposal will be transient at best, and not of sufficient quality to contribute to meaningful and enduring regional economic wellbeing. I also believe continuing with an extractives approach will in fact worsen the West Coast's economic position in the longer term.

To conclude, I disagree with the conclusion within the economic analysis that "the proposed mining operation will deliver significant regional economic benefits to the Grey District and wider West Coast region, and the project meets the regional benefit criteria in Regulation 45D of the NESFW."

I therefore disagree that consent for a discretionary activity under the NESFW can be granted.

## 2. Adverse Effects on Climate Change, Biodiversity, and the Natural Environment

Reducing our carbon emissions through rigorous and committed strategies, policies and practices is a national imperative – as shown by New Zealand's commitment to the Paris Agreement, along with 195 other countries, in 2015. The Agreement requires economic and social transformation, based on the best available science, and the pursuit of efforts "to limit the temperature increase to 1.5°C above pre-industrial levels."

The additional operation and truck movements along the coast road over the life of the activity will contribute significantly to the wrong side of the carbon ledger. I am concerned that there is no carbon mitigation and offset plan contained within the proposal. Specifically, I question the fairness of asking our West Coast farming communities and individual farmers to reduce their on-farm emissions, whilst permitting international companies to operate within New Zealand and thereby contribute to our carbon emissions profile without a comprehensive carbon mitigation and off-set plan.

I also have concerns regarding the proposal's potential adverse effects on biodiversity, wetlands, and the natural environment. New Zealand is a signatory to the Kunming-Montreal Global Biodiversity Framework (GBF) which aims to halt and reverse nature loss. The framework consists of global targets to be achieved by 2030. Among the twenty-three targets to be achieved by 2030 include 30 per cent conservation of land, sea, and inland waters, 30 per cent restoration of degraded ecosystems, halving the introduction of invasive species, and \$500 billion/year reduction in harmful subsidies.

Taking an extractives approach contributes to biodiversity decline. I would like to understand how TIGA views the alignment between its proposal, its approach to biodiversity loss mitigation and the GBF, and if it believes its approach upholds New Zealand's commitment to the Framework.

## 3. Adverse Effects on Local Community Wellbeing

I am aware of considerable local community opposition to TIGA's mining proposal at Barrytown. I believe that an international mining company's profit imperative should not take precedence above the wants and needs of local communities, regardless of royalties paid to central government nor temporary local wage-earning jobs created.

I would appreciate the chance to speak to my submission, should a hearing be convened. Thank you for taking the time to consider this submission.

Ngā mihi nui,

**Di Rossiter**