

**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:

DESCRIPTION OF PROPOSED ACTIVITY:

LOCATION:

**PART B: SUBMITTER DETAILS**

Full name/s	Michael Frederick Spruce		
Postal address	[REDACTED]		
I am the owner/occupier (delete one) of the following property:	[REDACTED]		
Primary contact person/s	Self		
Email address	[REDACTED]		
Phone number/s	Home:	[REDACTED]	Business:
	Mobile:	[REDACTED]	Fax:

Signature:	Date:
<input type="text"/>	<input type="text" value="8 October 2023"/>
Name (BLOCK CAPITALS):	
<input type="text" value="M. F. Spruce"/>	

*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

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)

Reason for submission: Coming from a mining background, I am supportive of high-value, low-risk operations. This consent application, however, outlines a venture that poses a range of risks and threats that – in my view – cannot be effectively managed or mitigated and that will result in significant adverse effects and costs to both the community directly impacted and to the West Coast as a whole. I therefore oppose the TiGa applications and attach my reasons below (given difficulties with this form, I have also emailed this submission as a Word document).

#### SUBMISSION

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

I request the applications be DECLINED in their 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.



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FROM M.F. Spruce  
[REDACTED]  
Email [REDACTED]

DATE 8 October 2023

RE Submission opposing TiGa applications to mine the Barrytown Flats.

**Reason for submission:** Coming from a mining background, I am supportive of high-value, low-risk operations. This consent application, however, outlines a venture that poses a range of risks and threats that – in my view – cannot be effectively managed or mitigated and that will result in significant adverse effects and costs to both the community directly impacted and to the West Coast as a whole. I therefore **oppose the TiGa applications.**

**I request the applications be DECLINED in their entirety.**

**Hearings:**

- I DO wish to speak in support of my submission.
- I DO NOT wish to be part of a joint case.
- S.42A Report – I request a CD & hard copy.

**SUBMISSION**

**CONTEXT**

1. The area under consideration is unique in character and in access: there is only one way in and out – the road between Greymouth and Westport. As a narrow coastal strip flanked to the east by the Paparoa Ranges and to the west by the Tasman Sea, it is a strategic part of the key conduit linking Haast to Karamea – the “supply chain” for the current community and economy, including the leisure and tourism market on the West Coast.
2. The Coast Road has been identified as one of the world’s top 10 coastal drives. This branding reflects the intrinsic value of the area and is worth far more than any fixed-term project as it is both sustainable and increasingly rare (see <https://www.travelandleisure.com/trip-ideas/road-trips/great-coast-road-new-zealand>).
3. Regional and national stakeholders should take an interest in the risk to a unique piece of the overall NZ brand and should invest in supporting a meaningful and sustainable local economy.
4. A significant number of local people have built their income and lifestyles, however modest, around the natural values reflected in this positioning and branding. The local, sustainable tourist economy is gradually recovering from the impact of Covid, so those involved are

particularly vulnerable to stress generated by this protracted resource consent process that poses a threat to livelihoods, wellbeing, and future.

5. The lifestyle, recreational and amenity values of a quiet, rural, and isolated area of natural beauty and unique flora and fauna cannot realistically co-exist with industrial scale mining.
6. Consenting authorities need to make a conscious and informed choice between current positioning and the proposed option: transition this into a high-traffic, industrialized zone.
7. The commodities sought by the applicant are not scarce and unique – the area targeted is a comparative drop in the ocean of resources available globally.
8. A cost-benefit analysis assessing the potential value of minerals recovery should therefore:
  - a. have a high threshold for risk, and
  - b. offer value unobtainable in less vulnerable contexts.

This application fails on both criteria.

**RISKS:** My main concerns, covered in this submission, are significant risks involving:

**Business / investment**  
**Operator methodology & track-record**  
**Community costs**  
**Key species – Westland petrel**  
**Consents processing**  
**Monitoring of compliance and enforcement of conditions**

### **Business / investment**

The Sense Partners report fails to take into consideration several key variables:

9. **Timescale:** “5 to 7 years, with application for 12” gives little confidence in a business plan which takes a projected median of 6 years and simply adds 50% “wriggle room”.
10. **Project / profitability costs:** - *“The exact export route for the mined material has not yet been confirmed, and the trucks may travel either ... north of the Site or ... south of the Site”* - Novogroup report p2,8. How can the returns of a project be reliably estimated if such key elements have not been finalized and costed?
11. **Economic and opportunity costs:** The report states: *“26. ... the proposed mining activity on a very small parcel of the West Coast region’s massive land area is unlikely to have any material impact on the decisions of domestic and international tourists to visit.”*  
This ignores the fact access to this *“massive land area”* depends on a single narrow corridor, and it also underestimates the discernment of the visitors we wish to attract.

And the admission: *“even if tourism did decline, the mine will generate more export revenue than any potential losses from lower ... tourism”* dismisses the impact on present tourism-related livelihoods and ignores the opportunity cost to next generation Coasters.

### **Operator methodology & track-record**

12. This is a new-to-NZ mining activity and methodology, and furthermore the applicants appear to lack a proven track-record.

### **Community costs**

13. The venture risks eroding the economic, social, and psychological fabric and well-being of a community. It would have a direct negative impact on local community safety and wellbeing, and on the long-term economic functioning of the region.
14. There is no financial analysis, nor engineering assessment of risk to the all-important road infrastructure including potential damage to key “pinch-points” (e.g. 10 Mile bridge) of heavy trucking. Nevertheless, the application claims potential impact is “less than minor”.
15. Increased heavy-duty trucking volumes would pose a significant increase in risk to both local community members and visitors who – by other means – are being enticed to visit the “untamed natural wilderness” that is the West Coast.
16. The key applicants appear to be well-resourced offshore players with no “skin in the game” regarding long-term regional health and wellbeing.
17. I have no issue with those playing hardball in pursuit of profit, but do have an issue with
  - how and where they are allowed to do this
  - the cost of their activities to the area and those impacted, and
  - the quality of the process that must hold them accountable in deciding what is allowed and where, and under what conditions.
18. There is a community in opposition at risk here - people who have spent years committed to a way of life that is now threatened. This, as a classic “billionaire vs bake sale” one-sided contest, is fundamentally disrespectful and unfair. The criteria of credibility and trust required to earn social license to operate are clearly lacking in this proposal.

### **Key species - the Westland petrel**

19. The grounding of adults and fledglings around exposed lights is a significant cumulative issue to this threatened population.
20. The ecological assessment report – in mitigation – relies on posteriori analysis once mortalities have occurred. This risk is compounded by the unrealistic expectation that those with the most to lose in reporting downed birds will do so.

### **Consents Processing**

21. There is a cumulative risk if the applications, with a raft of purportedly “no more than minor” effects, are dealt with in isolation rather than with consideration of potential long-term impact compounded by further applications over time.

22. If cumulative effects of other consented / potential proposals are not factored into deliberations, this will allow a "foot in the door" for those hoping to industrialize the region.
23. The macroeconomics are simple - what is the comparative value of global "branding" of NZ and in particular the West Coast coastal drive between Greymouth and Westport as a well-known feature, vs a "sugar-hit" for a limited number of years that will undermine this positioning? You can't have both in this location.
24. The impact will be progressive erosion of the security, safety and appeal of leisure, lifestyle, and tourism-related activities. These are already well-established and cannot be summarily sacrificed to a risky venture promising a limited term "sugar hit" for specific stakeholders.

#### **Monitoring of compliance and enforcement of conditions**

25. Conditions are all too often used to rationalize acceptance of risk, without due diligence given to the capacity of local authorities to monitor and enforce compliance with such conditions.
26. This is a significant consideration, where the go-ahead might be given to a project that carries significant identified and potentially unidentified risks, in a context where local authorities tasked with monitoring and enforcing conditions are not positioned or resourced to do so.

#### **SUMMARY**

27. The risks of the proposed venture significantly outweigh any potential benefits. I therefore request the applications be DECLINED in their entirety.

M. F. Spruce