

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

Office Use Only



11.45am

PART A: DESCRIPTION OF APPLICATION

CONSENT NUMBER:

APPLICANT:

2023-0046

TIGA Minerals and Metals Ltd

DESCRIPTION OF PROPOSED ACTIVITY:

Mining of Mineral Sands

LOCATION:

Barrytown Flats, SH6

PART B: SUBMITTER DETAILS

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

Signature:	Date:
	12-10-23
Name (BLOCK CAPITALS):	
NICOLA MARGARET CALCOTT	

*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)

Oppose the Land Use Consent - within a Coastal environment
Oppose the Discharge Permit - water to land
Oppose the Discharge Permit - dust to air
Oppose the Water Take Permit - to take and use ground and surface water for mining and associated activities.
Oppose the Land Use Consent - to breach District Plan rules.

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

I would like the WCRC and the GDC to deny the Resource Consents for Tika Minerals application to mine on the Barrytown Flats.
I would like the Councils to consider very carefully the impacts on the wetlands, lagoons and waters, the impacts on the community, the impacts on the avifauna and the aqua-life and the impacts of Mineral Sands mining's expansionism

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

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@wcr.govt.nz
Website www.wcrc.govt.nz

3. The Proposal

3.1

TIGA seeks all resource consents necessary to construct, operate and maintain a mineral sand mine, including associated infrastructure over an area of approximately 63ha (covered by mining permit 60785) and Nikau Deer Farm Ltd owned land on the Barrytown Flats.

My submission is against this proposal.

4. Assessment of Water Quality Effects

4.1

It is not possible to reliably predict the turbidity of the treated water, and it is possible that the turbidity could be significantly elevated above the low levels of background turbidity in Canoe Creek Lagoon, Collins Creek, and to a lesser extent the Northern Boundary Drain during some periods of the mining operation.

Response: Oppose

Any increased turbidity could have a more than minor effect on the waters in the lagoon.

4.21

Discharge of influent groundwater from the mine pit to surface water has the potential to result in concentrations of aluminium, arsenic, chromium, copper, nickel and zinc to exceed the ANZA 95% Species Protection.

Bramley (2023) provides a detailed assessment of the potential for adverse effects associated with this proposed discharge.

Response: Oppose

Any possibility of these metals and minerals exceeding the ANZA 95% will impact ultimately on the avifauna and aquatic species in the lagoon. More than minor.

4.14

This plan considers only the point source discharge of contaminants into land and water within the Coastal Marine Area.

Other plans that deal with point source and non-point source discharges outside the Coastal Marine Area must consider the downstream effects on water quality in the Coastal Marine Area.

This is because land-based activities affect surface run-off which enters the Coastal Marine Area.

Response: Oppose

“Land-based activities affect surface run-off which enters the Coastal Marine Area”

Regardless of whether they are point source or non-point source, or within or outside of the Coastal Marine Area – downstream effects on water quality must be considered. More than Minor.

4.16

The Land and Water Plan deals with point source and non-point source discharges on land or into fresh water above the Coastal Marine Area, which can have downstream effects on coastal water quality.

Response: Oppose

At the very least degradation of the water quality will most likely happen. Effects more than minor.

5.45

The effects associated with the through-flow of mine-influenced groundwater in the receiving environment are therefore considered to be less than minor.

Response: Oppose

Mine-influenced groundwater is more than minor.

5.46

In addition to groundwater flows, the proposal has the potential to affect surface water quality as a result of treated mine water discharging to land, which will ultimately discharge to water.

Response: Oppose

Any discharge to water will be more than minor.

5.5

West Coast Regional Land and Water Plan

5.1 Diversion of natural run-off – contaminated and uncontaminated.

5.2 Diversion of storm water run-off

5.3 Diversion of both contaminated and uncontaminated stormwater run-off will occur during the activity.

Response: Oppose

Diversion and dilution will not be enough to decontaminate these waters – that will ultimately end up in the lagoon. More than minor.

5.7

The proposed Te Tai O Poutini Plan provides for mineral extraction as a controlled activity within the Mineral Extraction Zone.

Response: Oppose

More than minor.

The only reason that this proposed mine is possible is because the area was made a mineral extraction zone. The lagoons are a SNA and with all the mitigation proposed with unknown outcomes the applicant cannot guarantee it will be no more than minor.

5.10

The consenting of this operation may also contribute to the viability of a regional processing facility to enable the further processing of the heavy mineral concentrate into its constituent parts, improving the value of the extracted minerals. This will only occur if there are a sufficient number of local mineral extraction activities to justify the expenditure on the plant.

Response: Oppose

The mining (mineral sands) fraternity is pushing expansionism so a regional processing facility can improve the value of the extracted minerals. This would involve multiple prospective mines, which is clearly the intent of this prospective miner.

5.51 Ecology

5.52

Effects associated with vegetation clearance
Effects on avifauna
Effects on Wetlands
Effects on stream ecology, water quality, and quantity

Response:

Effects on avifauna – more than minor
Effects on wetlands – more than minor
Effects on stream ecology, water quality and quantity – more than minor

5.54

Ten species of conservation interest have been identified as using the site or potentially at risk of adverse effects.

These species are:

- Koau (black shag – at risk)
- Tarapunga (black-billed gull – at risk, declining)
- Tara-nui (caspiian tern – threatened nationally, vulnerable)
- Parera (grey duck – threatened, nationally vulnerable)
- Tarapunga (red billed gull – at risk, declining)
- Torea (pied oyster catcher – at risk, declining)
- Tara (white-fronted tern – at risk, declining)
- Matuku Moana (pacific reef heron – threatened, nationally endangered)
- Torea (variable oystercatcher – at risk, recovering)
- Taiko (black petrel – at risk, naturally uncommon)
- Korora (little blue penguin – not listed, I have added it)

Response: Oppose

All of these birds are either at risk, threatened, or declining.
With the added risk of noise, vibration, dust, interference, and the possibility of contamination of

the waters is likely – more than minor.

5.55

An Avian Managed Plan has been developed for the site.

- Commencement of mining at least 100m from the edge of the Coastal Lagoon and monitoring of birds during mining.
- Maintenance of a 20m buffer from the edge of mining to the lagoon area.
- Planting of a 5m wide buffer with flax and other native species so as to visually screen the mining activities from the lagoon and contribute to reducing noise levels.
- Avoidance of mining the parts of the strips closest to the highest quality habitats between the months of September and December in order to provide separation from activities.

Response: Oppose

100m from the lagoon is not enough distance to protect the birds from noise and interference and a 5m wide buffer with flax and other native species so as to visually screen the mining activities, will take at least five years until it achieves enough height for it to be effective. Playing 'roulette' with vulnerable bird species is a risk and by excavating in such a close proximity, it is too much of a risk. More than minor.

5.56

Protection of the Taiko.

Pointing lighting downwards.

Limiting trucking to daylight hours only on the northbound route.

While this is difficult operationally to achieve while managing to remove the required amount of HML from the site, the applicant has agreed.

Response:

5.57

Overall the ecological assessment concludes that with the avoidance and mitigation methods applied to the proposal the effects on avifauna including taiko, will be low or no more than minor, in nature, with adverse effects being avoided on threatened and at risk species.

Response: Oppose

It is all hypothetical, the protection policies, the wetlands will change with the interference of the waters and the receiving lagoon would be compromised. Any impacts would affect the avifauna and aquatic species. More than minor.

5.58

Response: Oppose

More than minor

5.59

Response: Oppose

The proposal has the potential to alter water quality (visual clarity, sedimentation and increased metal loads) in surrounding water bodies, namely Collins Creek, Northern Drain, Canoe Creek, and Canoe Creek Lagoon.

5.60

The addition of fine sediment to stream environments has the potential to alter water chemistry – increase turbidity – and decrease light penetration, which in turn affects primary production and feeding for some fish species. Increased metal loading could result in water in receiving environments becoming toxic to various aquatic species.

Response: Oppose

The Coastal Environments is comprised of sensitive ecosystems which are in danger of corruption by the addition of increased metal loading and fine sediments. More than minor.

5.62

The ecological assessment concludes that the proposed water management strategy which includes extensive settling infrastructure, a discharge hierarchy for Pond 4 excess water based on water quality at the discharge point, lime dosing or limestone rock check dams to alter water hardness (reducing metal toxicity) and an extensive monitoring regime, will ensure that the potential effects on water quality are avoided.

Response: Oppose

Raising the PH in the water by adding lime to change the receiving environment will be detrimental to the avifauna and aquatic species. Any change in the PH level in the waters will impact on the ecosystem that supports this wildlife. More than minor.

5.64

In summary the robust water management methods proposed ensure that effects on water quality can be avoided, therefore ensuring that effects on stream ecology are also avoided. Some changes in water chemistry will occur, however the effects of these changes with all mitigations outlined will result in no more than minor ecological effects on the surrounding receiving environments.

Response: Oppose

“Some changes in water chemistry will occur”

Any change in water chemistry has a major impact on water bodies, and aquatic species. All the mitigation is still hypothetical lip service is nothing compared to examples of previous mining operations in a similar environment. Where are the examples undertaken by this prospective miner?

5.89

Where mobilisation of metals cannot be avoided, the effects are minimalised by applying hardness adjustments and changing the discharge location to a receiving environment capable of assimilating the change in water chemistry.

Response: Oppose

Altering the water chemistry in any receiving environment will be detrimental to the avifauna and aquatic life.

6.3

Considerable thought has been given by the applicant and the technical assessments to the appropriate management to avoid adverse effects on, and to preserve the health of freshwater in, the receiving environment of the application site.

Response: Oppose

The health of freshwater is vulnerable because the site is a wetlands and in close proximity from the coast (70m). The lagoons are sensitive ecosystems and the prospective mine does not have enough distance from the buffer zone for it to be safe. More than minor.

Section 6 of the RMA

6.32

a) The preservation of the natural character of the coastal environment (including the coastal marine area), wetlands and lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use and development.

Response: Oppose

Mining is an inappropriate industry in an inappropriate place. Wetlands and S.N.As lose protection because of the total interference with the waters that feed into Canoe Lagoon. The waters would be contaminated and any amount of mitigation, diversion, dilution and settling ponds would not be enough. More than minor.

6.33

The proposed mineral sands activity has been assessed as having no more than minor effects on the Coastal Environment and imposes adequate setbacks from wetlands and rivers. As such, the natural character of the area is considered to be protected from inappropriate use and developments.

Response: Oppose

They would be on the top of the wetlands with an inadequate buffer zone from the Coastal Lagoons (20m). Mining is a destructive industry using large machinery, it's effects are more than, "not more than minor".

The effects of mining are major, and highly impactful, and wetlands and lagoons are not appropriate places for the "Use" of the land. There is no protection for S.N.As.

6.35

Section 7 of the RMA

(d) intrinsic value of ecosystems

(f) maintenance and enhancement of the quality of the environment

Response: Oppose

I believe the intrinsic value of the ecosystems is comprised by this prospective resource consent. Maintenance and enhancement of the quality of the environment is not respected by applying for resource consent in this environment, because the quality of the environment is not appreciated.