

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

PART A: DESCRIPTION OF APPLICATION

CONSENT NUMBER: WCRC: RC-2023-0046, GDC: LUN3154/23

APPLICANT: 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: [REDACTED]

Postal address: [REDACTED]

I am the owner of the following property: [REDACTED]

Primary contact person: Anne Inwood

Email address: [REDACTED]

Phone numbers:

Home:

Mobile: [REDACTED]

Business:

Signature of the submitter (or person authorised to sign on behalf of the submitter):

Anne Inwood

Date: 12 October 2023

Name (BLOCK CAPITALS): ANNE INWOOD

[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; just type your name/s]

I oppose the application

I wish to be heard in support of my submission.

If you wish to be heard, and others make a similar submission would you consider making a joint case with them at any hearing. **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: **Hard (paper) copy**

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

I am not a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

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.

Submission

General Comments

I oppose the resource consent application by TiGa Minerals and Metals Ltd to establish and operate a mineral sands mine, including construction of associated infrastructure, at the Barrytown Flats site as identified in their application.

I came to live on the West Coast in 2017 to study and decided to stay on as it is one of the most beautiful areas in New Zealand. I have travelled extensively throughout New Zealand and travelled to more than 25 countries around the world, including living and working in a number of them. The scenic and natural values of the West Coast with its ocean, lakes, rivers, mountains and forest environs are unparalleled and these contribute to the very enjoyable, quiet life I have here. The prospect of a mine on the coastline of Barrytown in the midst of this wild and breathtaking beauty is of huge concern and in complete opposition to everything that the Coast represents for me. There is no way that a mine of this scale and its associated activities cannot have an adverse effect on the local people, the wider community and the environment.

Traffic and Road Management Adverse Effects

1. State Highway 6 is a narrow, winding road with many hairpin bends and climbing corners. It is located in a fragile and highly changeable environment which makes it vulnerable to many natural hazards, including slips, rockfalls, debris flows and constant coastal erosion. The proposed 50 truck movements hauling on the outward journey up to 30 tonnes every day, (as per the Novo Group Integrated Transport Assessment page 3) poses a significant threat to this essential transport route and community connection for West Coasters. The additional movements of 140 workforce vehicles every day just adds to this. Road users already face many challenges on this road and Waka Kotahi has its work cut out for it just keeping the road open from damage due to natural causes. The additional wear and tear on the road from these trucks will exacerbate these conditions and create more road closures and greater costs on roading which the taxpayer will have to pay for.
2. The increased risk to other road users will become worse also. Those road users include school children being transported on the three school bus routes which cover the coast road, tourists, cyclists, pedestrians and hikers, motorcyclists, local residents and workers. As someone who travels along the coast road most days of the week, I know how fragile and dangerous this road is, how often there are full or partial closures on it. This situation will only become worse if these 50 30 tonne trucks movements are allowed to take place on it every day, regardless of whether it is north or southbound.
3. The risks already faced by every person travelling on State Highway 6 is a well-known and widely documented fact as illustrated in this 2021 article published on Stuff on 1 May - <https://www.stuff.co.nz/national/124767209/the-west-coasts-deadly-roads-onelane-bridges-narrow-roads-inexperienced-drivers>

4. TiGa argues that this is a State Highway but anyone who frequently uses this road knows that it is already dangerous, the landscape in which it is located is very fragile and the risks are already high for all road users. The mine trucking will only make these factors worse and create significant adverse effects.

Radiation adverse effects

5. The proposed method of mining is unproven in New Zealand to the extent that there is not even a New Zealand standard protocol for dealing with heavy mineral concentrate (HMC) with a radiation content. TiGa says that the process will all be safe but if that is the case why does their application propose the use of the Australian Code of Practice and safety guide published by the Australian Radiation Protection and Nuclear Safety Agency. Clearly this activity poses a significant threat in terms of the management of the radiation risk and this would therefore represent a significant adverse effect.
6. Australia's mining areas are different from the New Zealand environment so there is no guarantee that those Australian practices would be suitable for the Barrytown Flats environment.
7. Beyond the radiation risk during the mining and processing, the applicant provides no details on how the community and wider population will be protected when the HMC is being moved around the coast to wherever it will be shipped from. The Greymouth port effectively sits in a wind tunnel with the Barber, a katabatic wind frequently roaring down from the Paparoa Ranges; as well as the marine westerlies coming in off the sea. The rail storage site at Rapahoe is also exposed to strong wind and bears the brunt of the Barber also. At the proposed mining site, the storage and loading of the HMC is planned to be done under cover in a building, but there is no indication on how the safe loading of the HMC will take place at its shipping location either at Rapahoe, Greymouth or at Westport which is also subject to strong winds. Whether transported off the Coast by train, barge or road, plans need to be provided about storage and loading after the HMC leaves the mine site. After all, it is in the HMC that the radiation risk occurs. In the Dust Management Plan, there is no word on managing the dust and minimising risk of radiation or other toxic dust particulate exposure once the trucks have left the site other than to say that they would be covered. This does not adequately address the offload from trucks onto whatever the next form of transport would be to get the HMC off the Coast. The effects of this would be adverse and it is likely to impact the wider community which is unacceptable.
8. In the absence of a New Zealand standard or code of practice for managing radiation risk, I believe there should be a requirement for an independent authority, for example, the Institute of Environmental Science and Research to have oversight on the mining process to ensure the safety of the local and wider community.
9. I do not believe that TiGa has demonstrated they would take full responsibility for the impacts of the proposed mining at all levels from the point at which the HMC is removed from the ground to when it is sent out of New Zealand and on to whatever industrial use it is put too. This mining proposal is a bigger issue than just the Barrytown Flats, the West Coast and New Zealand. It would have global impacts.

Plant Operations Adverse Effects

10. The proposal to run the processing plant 24 hours, seven days a week is unreasonable within a rural community setting. Many people within the Barrytown community and within wider Coast communities have chosen to live here for the quieter and slower pace of lifestyle

offered here. I believe that running this operation beyond daylight hours will have significant adverse effects on the local community, the farm stock on surrounding farms, the mine's employees and their families, the birdlife found all along the Barrytown Flats coastline, lagoons and wetlands. The noise, machinery vibrations, light and traffic effects will be detrimental to all of these.

Environment, Wildlife and Climate Adverse Effects

11. At a time when governments, businesses, communities and individuals all over world, not just in New Zealand, are making enormous efforts to reduce carbon emissions, live more locally, consume less and have less of an impact on our environment, this mining proposal does none of those things. It is proposed that 250,000 tonnes of HMC will be removed each year for up to 12 years, that the level of the land will be reduced by 1.2 metres, water will be diverted from creeks and later discharged again. The hydrology of the area will be changed and there is a serious risk of sedimentation and contaminants getting into the creeks, wetlands, lagoons and on into the ocean.
12. Coastal erosion and seawater incursion are very real, current and ongoing risks on the West Coast. The zoning for the Barrytown Flats in the proposed Te Tai o Poutini Plan is Coastal Setback, Coastal Tsunami Hazard and Coastal Alert (Map 39). As a frequent beach user around Barrytown, I have seen the coastal erosion taking place and the effects of storms and high tides on the shoreline. This area is highly fragile and vulnerable and should be protected, whereas the mining activities proposed will pose a definite threat to the way in which the land and the waterways respond to the elements, including the high rainfall in the area.
13. There is no discussion in the application documents about how the massive emissions from this mine would be mitigated. The machinery and trucks and plant operation will be significant carbon emitters, including diesel generators which may or may not be a permanent fixture based on paragraph 3.24 of the 'On-site processing, buildings and facilities' section in the main application document. Here it is stated that subject to when electricity can be put in with additional overhead power lines (another visual blight on the landscape), diesel generators will be used for the short term "or if electricity line capacity remains insufficient". This could have an immense impact on so many levels: noise, vibration, fumes and carbon footprint. In addition to these impacts, there is the risk of catastrophic contamination if the suggested 40,000 litres of diesel were to spill (see Hazardous substances use, storage and management, paragraph 3.60, page 26 main application).
14. The New Zealand government has declared a climate crisis but no Emissions Report has been provided in this application and the applicant has not taken into consideration the Emissions Reduction Plan and has provided no remedies to meet the targets and actions of that plan.
15. Less than seven kilometres up the road from the proposed mine are the only breeding colonies of the Westland petrel which is highly vulnerable to lighting, traffic and noise. For more than 70 years, this seabird has been studied and efforts made to help protect them It is very common for the birds to be struck by vehicles, particularly in the fledging time and the local community has worked closely with the Department of Conservation to mitigate risks to the young birds when they first leave the colony. Often the birds follow the coastline and range all over the Coast, frequently turning up in Greymouth and Westport and they can be grounded due to light distraction. There is the potential for significant adverse effects on a cumulative basis for the Westland petrel from the mining and its vehicle activities.

Nature and Cultural Tourism

16. This is an “Untouched Natural Wilderness” as promoted by Development West Coast (DWC) and it’s our duty as residents to be guardians of this incredible corner of Planet Earth, to protect it. On DWC’s West Coast website they describe the Great Coast Road (State Highway 6) between Westport and Greymouth as having “been named one of the Top 10 Coastal Drives in the world according to Lonely Planet”.
<https://westcoast.co.nz/visit/operators/great-coast-road/>

17. Here on the West Coast and overseas, I have worked with many international tourists and I frequently host visitors here from overseas and around New Zealand. They come to the West Coast to see the incredible natural beauty, especially the coast road and all it offers. The proposed mine is at complete odds with that image and reality. It threatens what we have here, putting at risk all the recent developments and initiatives to draw more visitors and new Coasters to the area, including the Dolomite Point Experience Centre, the Pounamu Pathway developments, the Kawatiri Coastal Trail and the Paparoa Great Walk Track. Post-Covid, tourism is thriving here on the Coast, our economy is growing fast and we cannot afford to damage the reputation of this region as being one of great natural beauty, where everyone can experience nature, activities and adventures they won’t find elsewhere in the world.

Decision Sought

The mining proposal by TiGa would not enhance the West Coast. What is proposed is a short term unproven high risk venture being driven by overseas speculators, with the high risk being that of uncertain economic return and severe and significant adverse effects on the West Coast people, our communities, our roading infrastructure, our wildlife, our natural environment and our livelihoods.

I seek the following decision from the Local Authority: that the application be declined in its entirety.

Thank you for the opportunity to submit on this matter.