

## Form 13

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**Submission on application concerning resource consent that is subject to public notification by consent authority**

**Sections 95A, Resource Management Act 1991**

**To:** West Coast Regional Council and Grey District Council

**Name of submitter:** Fire and Emergency New Zealand

This is a submission on an application from TIGA Minerals and Metals Limited for a resource consent from West Coast Regional Council and Grey District Council to establish and operate a mineral sands mine in Barrytown.

Fire and Emergency New Zealand (Fire and Emergency) is not a trade competitor for the purposes of section 308B of the Resource Management Act 1991 (RMA).

The specific parts of the application that Fire and Emergency's submission relates to are:

- *The provision for firefighting water supply*

**Fire and Emergency's submission is:**

In achieving the sustainable management of natural and physical resources under the RMA, decision makers must have regard to the health and safety of people and communities. Furthermore, there is a duty to avoid, remedy or mitigate actual and potential adverse effects on the environment.

The risk of fire represents a potential adverse effect of low probability but high potential impact. Fire and Emergency has a responsibility under the Fire and Emergency New Zealand Act 2017 to provide for firefighting activities to prevent or limit damage to people, property and the environment. As such, Fire and Emergency monitors development occurring under the RMA to ensure that, where necessary, appropriate consideration is given to fire safety and operational firefighting requirements.

In order for Fire and Emergency to achieve their principle objective which includes reducing the incidence of unwanted fire and the associated risk to life and property, protecting and preserving life, and preventing or limiting injury, damage to property land, and the environment, Fire and Emergency requires adequate water supply be available for firefighting activities; and adequate access for new developments and subdivisions to ensure that Fire and Emergency can respond to emergencies.

The provision for adequate water supply is therefore critical. It is important to Fire and Emergency that any new subdivision or land use has access to adequate water supply (whether reticulated or non-reticulated). This essential emergency supply will provide for the health, safety and wellbeing of people and the wider community, and therefore contributes to achieving the purpose of the RMA.

**Firefighting water supply**

The application has not stated whether the site is reticulated or not, however the application does state that the site will have a firefighting water tank with a diameter of 10.5m and a height of 6.5m.

Given the presence of buildings and machinery on site there needs to be appropriate water supply in accordance with the firefighting water supplies code of practice (SNZ PAS 4509:2008) whether this be provided via the proposed tank or a reticulated water supply.

This resource consent application, being for a large mining operation, that is potentially outside of a reticulated water supply, has a high fire risk due to the uncertainty of the amount of available water on site. Therefore, Fire and Emergency requires certainty in terms of the provision of water supply for firefighting purposes and the location of the water supply.

**Fire and Emergency seek the following decision from the consent authority:**

- That prior to commencement of mining operations, including the erection of any buildings, that sufficient water volume, pressure and flows in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008 shall be provided.
- The Consent Holder shall prepare in consultation with Fire and Emergency New Zealand, a Site Emergency Management Plan (SEMP). This should include procedures to manage the risk from and contingency for:
  - Fire
  - Mining explosion
  - Forecast Extreme weather events
  - Flooding

Fire and Emergency may wish to be heard in support of its submission. If others make a similar submission, Fire and Emergency will consider presenting a joint case with them at the hearing.

Fire and Emergency does not 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.



Signature of person authorised to sign on behalf of  
**Fire and Emergency**

<b>Date:</b>	12/10/2023
<b>Electronic address for service of person making submission:</b>	██
<b>Telephone:</b>	████████████████
<b>Postal address:</b>	██ ██ ██
<b>Contact person:</b>	Lydia Shirley