

**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:

WCRC: RC-2023-0046 GDC: LUN3154/23

TiGa Minerals and Metals Ltd

DESCRIPTION OF PROPOSED ACTIVITY:

a mineral sands mine in an area of approximately 63ha over a 12-year period

LOCATION:

Map reference NTZM: 1460770E, 5082683N

Legal description: Lot 1 DP 412689 and Rural Section 2847

PART B: SUBMITTER DETAILS

Full name/s	Kevin Grant HAGUE			
Postal address	[REDACTED]			
I am the owner/occupier (delete one) of the following property:	[REDACTED]			
Primary contact person/s	Myself			
Email address	[REDACTED]			
Phone number/s	Home:	n/a	Business:	n/a
	Mobile:	[REDACTED]	Fax:	n/a

Signature:

[REDACTED]

Date:

12th October 2023

Name (BLOCK CAPITALS):

KEVIN GRANT HAGUE

*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)

THE APPLICATION FOR RESOURCE CONSENTS SHOULD BE DECLINED ENTIRELY, because:
a)the economic benefits claimed for the project are uncertain but likely to be greatly overstated
b)the applicant has not provided a robust, independent and credible economic assessment of the proposal
c)the application is inconsistent with the region's economic development strategy
d) the project would have significant adverse effects on the tourism industry, individual operators and that industry's benefits for the region
e) the project would have unexplored costs on infrastructure and travel times
f) the project would have adverse effects on native flora, fauna, habitats and ecosystems that cannot be avoided, mitigated or managed
g) the project would have adverse effects on amenity values and road safety

Full details in attachment

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

THE APPLICATION FOR RESOURCE CONSENTS SHOULD BE DECLINED ENTIRELY

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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Submission of Kevin Grant Hague

I submit that the application for resource consents from TiGa Minerals should be completely declined.

Introduction

I have lived in Greymouth for 20 years. So not a Coaster, then! But long enough to understand the way the values, history and culture associated with mining are still important to the West Coasters of today, while also seeing how those same factors so easily blinker the way that many West Coasters see the future.

I have held community leadership positions, including Chief Executive Officer of the West Coast District Health Board and Member of Parliament. I continue to hold community leadership positions: I chair the West Coast Primary Health Organisation and Takiwā Poutini, an intersectoral collaboration of community, iwi and service providers to achieve wellbeing. I'm a Civil Defence Emergency Management Incident Controller. I have held, and continue to hold, national leadership positions too, chiefly in the health and conservation areas. While I draw on that experience for this submission, I am submitting absolutely in my personal capacity, rather than on behalf of any of these organisations.

It's comfortable to think that the future will be kind of like the past. It gives us the sense that the territory will be familiar, and we will be able to navigate its challenges with some confidence. And for much of human history it's been reasonable to live on this basis. Until it's not. The great convulsions of human history, including technological changes, have usually been unexpected. Those who could adapt survived. Those who clung to the familiarity of the past did not.

The world is changing around the West Coast. Some of those changes include - finally - trying to organise our societies and economies to limit climate change, and addressing the wave of habitat degradation and destruction and accompanying extinctions of the animal and plant species we share the planet with. Approaches to living in the future that are likely to succeed are ones that minimise greenhouse gas production (and ideally sequester Carbon), that restore (or at least protect) nature and that establish circular, weightless economies that drive extraction to an absolute minimum and depend upon knowledge and information.

The West Coast is currently a long way from that (prominence of extractive industries, high level of profits going to other regions and even countries, low educational achievement, a demographic structure that reflects how so many young people have to move away) but could quickly turn things around. There have been some encouraging signs with growing acceptance of the absolute necessity to build a more resilient, diverse economy and for knowledge industries to play a much bigger role. But it often seems that whenever a new mine is proposed a switch is activated in the reptilian part of our leaders' brains, generating a knee jerk lurch back to the familiar past.

Mining will continue to be necessary, but not in the way that we do it now. We must as far as possible use materials that can easily be recycled and create infrastructure to ensure that recycling occurs, to minimise our need for new materials. Where new materials are required, they should be obtained from the places with the least negative consequence for people and environment.

This is the backdrop to the application from TiGa. It's an application to extract relatively common minerals from, and with substantial negative consequence to, an environment that has considerable biodiversity and amenity values, with little economic benefit which, in any case, will be more than offset by the damage it does to other parts of the economy. It's an anachronism. Of course, our civic leaders support it – it's a mine.

These same characteristics make it inconsistent with the RMA tests (and even less consistent with those in the new Act; while these are not yet operative, they nonetheless ought to be taken into account if an assessment of legislators' intention is required). It's also inconsistent with the Te Whanaketanga: Te Tai Poutini West Coast Economic Development Strategy and with any reasonable assessment of our region's needs.

The decision should be made independently of West Coast Councils

There have been strong calls for this application to be called in by the Minister for the Environment, and I support those calls. Indeed, it's hard to think of a scenario where this would be more appropriate, unless perhaps councillors had a direct financial interest in the mining company. Civic leaders from both the District and Regional Councils have made public comments supporting the proposal (or its near identical predecessor. A quick glance at the submissions received prior to mine shows that at least one regional councillor, Allan Birchfield, has made a submission (albeit a 'form' submission) in support of the application. There are some other councillors whose close family members have made submissions in support. It stretches credulity to rely on other councillors and officers reporting to these councillors to maintain complete independence from these views and be able to make objective judgments.

If the Minister does not call in the application, then completely independent commissioners must be appointed to consider it.

The economic case doesn't stack up

Every mining company that ever seeks resource consent paints a picture of a depressed local economy sorely in need of the many jobs their project will undoubtedly provide. We are told that TiGa's project will create 57 direct jobs and that there will be further direct jobs in a mining contractor and trucking contractors, so the 57 does not include these. That being the case it is very hard to see what these 57 jobs would entail, and TiGa's description is so vague and generalised as to be useless.

It is important that consideration of the application includes a thorough and sober assessment of its economic claims. As this claim of direct employment seems improbable, it is incumbent on decision-makers to require a clearer specification of exactly what these jobs are planned to be.

It would have been helpful for there to have been a robust assessment of the economic benefit claims in the application. Unfortunately, there isn't. The document provided by Sense Partners is the flimsiest attempt at an economic evaluation that I have ever seen and is riddled with inappropriate assumptions and methodological errors.

The Sense Partners document does not probe even slightly TiGa's direct employment claims and calculates the indirect employment number of 80 based on a 2014 Australian industry source. It

concludes that there are no New Zealand sources available for calculating this indirect employment, but that the Australian and New Zealand contexts are sufficiently similar for Australian data to be applied. There is no consideration at all given to what are, in fact, vast differences between mining in the Australian context (where entire regional economies tend to be dominated by the industry) and the Grey District context, where despite our history, mining now represents just a tiny part of our economy (1% of jobs according to Sense Partners). It's not clear what the effect is of this difference in context, but it should have caused an independent assessor to at least explore this.

Both TiGa and then, in turn, unquestioningly, Sense Partners repeat the trope that our region is one where jobs "have been hard to come by". In fact, at a time where unemployment nationally is close to an all-time low, the West Coast has one of the lowest rates of any region. As anyone actually in the West Coast would know. In the workforce with the skills to work in TiGa's proposed mine, the unemployment rate is essentially zero – creating new jobs will create vacancies somewhere else, most likely in the construction industries. Weirdly Sense Partners uses a metric of employment growth over time, which has no direct relationship to the issue. One has the sense they were trying to find a metric that might support their narrative.

So, the workforce to fill TiGa's jobs will actually have to come from somewhere else. Where will they live? The Grey District currently has a very acute housing shortage. It's not alone in that, of course, but people are living in cars and garages because they cannot find houses. And increasingly tradespeople, for example, are retaining their homes in other parts of the country and "commuting" for work on the West Coast. It seems likely that this would be the case for a significant proportion of the TiGa workforce.

In fact, that's not unusual for the mining industry in general, both in New Zealand and around the world. Jobs – especially the more highly paid ones - are not so much filled by local people but by temporary residents or people who "fly in and fly out". Of course there is no analysis of this either by TiGa or by Sense Partners. But the consequence is that spending in the local economy and indirect employment are likely to be substantially below the levels predicted by traditional economic models. It should also be noted that this kind of transient or temporary workforce can bring benefits, but also problems for a community, in the shape of disorder, crime and difficulty gearing infrastructure and services for the population served. The evidence is also clear that while it can provide some short-term boosts, it does not deliver sustainable prosperity to communities.

That's very important because spending in the local economy - we should probably assume the calculation of \$27.4Mn per annum by Sense Partners is an extremely ambitious maximum – is the only economic benefit the Grey District or West Coast region might hope to see. Many of TiGa's contracts will be with companies in other parts of the country or the world, and ALL the profits will be heading somewhere else.

So, to recap:

- Almost certainly fewer direct jobs;
- Almost certainly a lot fewer indirect jobs;
- Certainly problems with employment gaps in other parts of the economy;
- Increased shortage of accommodation, particularly affecting those least able to cope;
- Certainly a significantly smaller financial contribution to the local economy;
- Potentially some negative effects of a transient workforce;
- None of the profits retained on the Coast.

What constitutes economic benefit?

Te Whanaketanga: Te Tai Poutini Economic Development Strategy has been endorsed by all three district councils, the regional council and both Hapū on the Coast. It is a strategy for a more well-rounded and diverse approach to economic development. It talks about mining as an industry in which the West Coast has a competitive advantage that can be:

“...utilised to support the regenerative economic future we aspire to. By focusing on this approach, we are able to unlock economic opportunities whilst protecting and enhancing the natural environment for future generations.”

This appears in the context of a ‘mission’ to “Strengthen and diversify our economy”. The description of this mission says we need to:

“...actively support the growth of emerging industries and strengthen our economic drivers by focusing on added value.

“By focusing on a more circular economic approach, we are able to increase the value of our products and deliver better outcomes for the environment. Our economic activity must actively protect and give back to the natural environment that supports our prosperity.”

It’s a great strategy and decision-makers on this application should look to it for direction on what constitutes economic benefit in the context of the RMA.

- The TiGa project is entirely inconsistent with regenerative practice, or a regenerative economic future.
- It does not protect or enhance the natural environment; in fact, it destroys or degrades it.
- Less will be available for future generations if it proceeds.
- It does not strengthen and diversify the economy; it’s more of the same trap Te Whanaketanga is trying to get us out of.
- It does not add value at all, just digging up and shipping out the raw material.
- It exemplifies the reverse of a circular economic approach.

In other words, the TiGa proposal is almost the polar opposite of the direction that our regional economic development strategy sets as economic benefit. I will deal some more with environmental effects below, but I want to mention tourism. The TiGa proposal is not only incoherent with our economic development strategy, and greatly overstates benefits, but it also has damaging effects on another part of the economy.

Tourism

The road between Greymouth and Westport is regularly rated as one of the most scenic in the world, with jaw-dropping vistas up and down the Coast or inland to the Paparoa ranges. It draws tourists from around the country and around the world. Some will be in camper vans, saving on accommodation costs but staying longer and eating more; some will be in cars, boosting the accommodation sector too, and some will be on bikes, staying for multiple nights and consuming a lot of beer and pizza. They make up a significant portion of our economy. I don’t know how big, and certainly it doesn’t appear in TiGa’s application or Sense’s “assessment”.

It’s important because a driver or cyclist having to share the road with all TiGa’s truck movements will have a degraded experience. The road will disappear from those “Best of...” lists and fewer visitors will be attracted here. It’s not only the literal impact of the degraded experience. I have cycle-

toured in many places (and spent a lot of money on accommodation, pizza and beer in doing so). I think I have a fair idea of what attracts people. The idea of being able to experience one of the most scenic routes in the world does. Experiencing “untamed natural wilderness” does. “Experiencing what once was “untamed natural wilderness” but now is tamed by extractive industry, particularly in or adjacent to what are some of its most important biological features absolutely does not. Even if the mining operation is not visible, the very idea that it exists compromises the brand and undermines the tourism industry.

The Sense Partners document breezily dismisses this concern but, as usual, their ‘analysis’ fails to withstand even the slightest scrutiny. The comparison they use (and I’m not making this up) is between the estimated average export revenue from the mine against the pre-Covid spending on the West Coast by international visitors. We are not concerned with average export revenue, but rather the portion of that that stays in the West Coast economy (likely substantially less than the \$24.7Mn claimed, and much, much less than the \$64Mn total). If we’re going to deal in estimated future revenue, as we probably should, then we should consider the estimated future tourist numbers (which are projected to grow) and their spending in inflation-adjusted dollars, so that we’re not comparing say 2026 mining revenue dollars with 2019 tourism dollars. And while export revenue is certainly valid for some economic purposes, for assessing impact on the local economy there is no reason at all to only consider the spending by international visitors. This is important because the bulk of visitors to the West Coast are domestic in origin (more than 90% in the most recent data from May 2023).

In other words, the comparison made by Sense Partners is complete economic nonsense (yet another reason why a proper economic assessment should be commissioned from a reputable firm). The marginal negative effect on visitor numbers would need to be considerably less than they calculate, and well within what is reasonably likely, for this project to be a net economic negative for the West Coast economy.

Even if the net effect is not negative. Those who benefit from the project are unlikely to be those who lose from the impact on tourism. There will be an unavoidable adverse effect on many of those whose livelihoods depend on tourism.

There are two further economic impacts I’d like to mention. Firstly, the big increase in slow-moving trucks on the road will slow down all traffic. In addition to the inconvenience and frustration this will cause, there would also be economic impacts from increased travel times. Secondly, the big increase in heavy traffic on the road will increase the cost of maintaining the road, and of safety for all road users. These adverse impacts are also excluded from the economic overview from Sense Partners.

In conclusion to this section, I return to the beginning: it is normal for mining companies seeking consents to exaggerate prospective benefits and to understate costs. TiGa has done precisely these two things, and they have been assisted in doing so by being subject to an entirely inadequate and unacceptable economic “assessment” by Sense Partners. I submit that the report from Sense Partners should be struck out and a properly independent assessment from a reputable company be required, in which the matters I have raised are fully considered amongst a complete reconsideration of the matters canvassed in the Sense Partners document.

I am reminded of the knife-edge decision to give resource consent to Bathurst Resources for the Escarpment mine on the Denniston Plateau. The decision records a finely balanced judgment, because of the clearly important ecological values that would be compromised, but grants the resource consents because of the importance of the economic benefits to the Buller District at a time

when employment was really needed. 225 jobs were promised, as was a \$1Bn injection into the economy over the next six years. Fast forward a couple of years and the company has dug into the plateau, destroying a fragile ecosystem forever and unleashing the process of acid mine drainage that will continue for centuries, but the economic benefit to Buller has come to nothing and just two people are employed, running the machinery required to deal with sulphuric acid.

It's a story that should remind us to be sceptical of mining industry claims and to demand really robust, independent analysis of them. It's a story that should remind us that the environmental costs of a mine are often sustained immediately, while the benefits may take years to materialise and could vanish into the never-never. And it's a story that should remind us that mining is a boom-bust industry. TiGa sees a market for these minerals now. But if global supply increases or demand falls, it's hard to imagine a future for the mine furthest from its markets, with all the added shipping costs, and it's the easiest thing in the world (in fact standard industry practice) for the company that exists one year, to be nothing more than a memory the next.

The Environmental costs are too high

I will leave it to others to set out the detail of the environmental impacts from the proposed mine. There will be adverse effects on indigenous flora, fauna, ecosystems, and habitats. These will be mostly impossible to mitigate further or to manage. Management would effectively be observing the destruction of these values, which cannot be what the Act intends.

I used to be the Chief Executive of the Royal Forest & Bird Protection Society of New Zealand. In that capacity I became even more keenly aware of the progressive, incremental destruction. We have lost 90% of New Zealand's wetlands, for example; TiGa's proposal would see even more degraded or lost. 90% of our seabirds are sliding towards extinction; TiGa's proposal would increase the risks to one of the rarest. And likewise, the unseen wave of diminishing and extinction that is besetting our invertebrate species, freshwater fish and plants. Yes, a lot of what TiGa wants to dig up initially will be a modified landscape of pasture, but the digging up will affect the neighbouring areas also, and how long will it be before you are facing an application to extend the mine into these areas, which by then will have compromised values.

We cannot afford to lose more. In fact, as Te Whanaketanga says, we must reorient our economic activities to protect and restore nature, not take more from it.

Those of you who have explored the back country may have been puzzled by the traditional place names, well inland, that carry the names of seabirds. That is because of an ecological system that sees seabirds naturally nesting inland in forests, sometimes into the mountains, and fertilising the land around to help maintain forest health. Human occupation has seen the loss of almost all New Zealand's coastal forests, and this has been a major factor in the decline of seabirds. One of the few places still to have an intact mountains-to-sea forest system is Barrytown, and it's no surprise that this is the only home of one of our rarest seabirds, the Tāiko.

I recognise that TiGa has made some attempts to mitigate the impacts of its proposed activities on Tāiko, but it still seems certain that there will be adverse effects on Tāiko if the mining activity proceeds at all. These cannot be avoided, mitigated, or managed, and the proportionate effect on such a rare species of even a small adverse impact is such that this should be sufficient to decline the application in its entirety.

What we should actually be doing is looking for opportunities to expand the coastal forest on the Barrytown Flats, along with intensive pest control, to provide more habitat for these birds and encourage restoration, as our Economic Development Strategy says that we will.

There are other adverse impacts.

Residents from Barrytown and the Coast Road communities will, I'm sure, reflect on the values of the place and why they live there. That's amenity, and it's difficult to find measures for that enable it to be weighed against more easily quantifiable effects like jobs and dollars. Views, being able to hear birdsong, or otherwise experience rich biodiversity, a sense of feeling part of the landscape rather than dominating it. I can readily see how these will all be adversely affected by a major industrial activity right on their front doorstep, and I already know people who have moved away from fear of the impact the proposed mine would have on them. I think that's unacceptable.

To a smaller extent this loss of amenity affects everyone on the Coast, including me – if the mine proceeds I will be less likely to travel north at all, and specifically to bike the Coast road. It will be more dangerous (another adverse effect) and a less pleasant place to be.