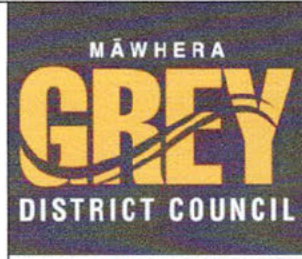


**FORM 13: SUBMISSION
ON AN APPLICATION FOR RESOURCE CONSENT
UNDER SECTION 96
OF THE RESOURCE MANAGEMENT ACT 1991**

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:

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/s	Rosalind Diana Squire		
Postal address	[REDACTED]		
I am the owner/occupier (delete one) of the following property:	[REDACTED]		
Primary contact person/s	Rosalind Diana Squire		
Email address	[REDACTED]		
Phone number/s	Home:	[REDACTED]	Business:
	Mobile:	[REDACTED]	Fax:
			N/A

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

Date:

13 October 2023

Name (BLOCK CAPITALS):

Rosalind Diana Squire

*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)

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

The specific parts of the application that my submission relates to are: *(give details)*

See attached

Type text here

My/our submission is that: *(include whether you support or oppose the application or specific parts of it; whether you are neutral regarding the application or specific parts of it; and the reasons for your views).*
Oppose the application in its entirety

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

Decline the application for the reasons outlined in this submission

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

*Select one.

*I ~~am~~/am not† directly affected by an effect of the subject matter of the submission that—

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition.

*Delete this paragraph if you are not a trade competitor.

†Select one.

I request/~~do 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.

*select one.

Important information – Please read carefully

I oppose the application for the following reasons:

Adverse effects on the environment

The application states that the proposal will have no more than minor adverse effects on the environment, but it includes over 110 complex conditions of consent, many of which require the preparation of complex and detailed management plans and monitoring. There are many examples of mining operations in New Zealand which make bold statements and commitments to obtain consents that have left adverse environmental legacies which have lasting damage on ecosystems and communities.

I live in Nelson, but my extended family and I stay at Punakaiki every spring and walk the Barrytown beach to collect stones and enjoy the unique and wild environment and we are never alone, many people go to this beach for the same reasons. I have also walked and mountain biked the Paparoa and Croesus Track and regularly stay at local accommodation providers and use the shuttle service, all of which are thriving despite Covid because of this unique and special area. I have walked all the great walks in New Zealand and tramped and cycled widely in the South Island and I think this area is one of the most beautiful stretches of coastline in New Zealand. The site is very visible from the Croesus Track and sections of the Paparoa Track and will have an adverse impact on the views which for the most part showcase New Zealand's efforts to protect this natural environment.

We have watched the development and success of the planting associated with the Westland Petrel Special Protected Area and the widespread community commitment to this area to protect the unique values.

I am very concerned about the adverse effects of the proposed activity on the local community, the unique biodiversity values of the area and the very special place that is Punakaiki and the Paparoa National Park. The application infers that if consent is granted they will be seeking more applications, the assessment stresses the short duration of consent, but if it is granted they will use this as a precedent and there will be ongoing adverse effects for these and other communities who live, work and recreate in the area and for visitors who come from around the world to visit this very special place.

I have read many of the submissions from the local community and they are best placed to talk to their concerns, many of which I agree with – particularly the effects on the daily lives of people who live and work in the area - so for the sake of brevity will not repeat them here.

This decision is very important and I hope that short term economic gains for a multinational mining company (who clearly have the resources to overwhelm the voice of this local community) will not override the ecological values and the community in this very special place.

The activity is inconsistent with Part 2 of the Resource Management Act 1991

Specifically:

Section 5 (2) (c) - Avoiding, remedying, or mitigating any adverse effects of activities on the environment;

Section 6 (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 (c) - the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna); and

Section 7 (c) - the maintenance and enhancement of amenity values), (d) – intrinsic values of ecosystems) and (f) – maintenance and enhancement of the quality of the environment)

The activity is inconsistent with the New Zealand Coastal Policy Statement 2010

Policy 11 (a) – Avoid adverse effects indigenous taxa that are listed as threatened or at risk, indigenous ecosystems and vegetation types that are threatened in the coastal environment, or are naturally rare, habitats of indigenous species where the species are at the limit of their natural range, or are naturally rare, areas containing nationally significant examples of indigenous community types and areas set aside for full or partial protection of indigenous biological diversity under other legislation.

Case law (Specifically the King Salmon Case) is clear that avoid means avoid on all of the above, including the Westland Petrel Special Protected Area. It does not mean granting consent that requires a suite of complex conditions (many of the details of which are left to be addressed after the grant of consent), of which there is no guarantee of compliance and therefore no guarantee of avoiding adverse effects. In my opinion, a precautionary approach is needed in this case.

One of the “key focus areas” of the Avian Management Plan is to avoid adverse effect on the Westland Black Petrel/tāiko. However, the Plan includes a protocol for responding to Westland Black Petrel/tāiko found grounded at the application site. I assume this is required because there is a risk that the activities on site will disorient the birds.

I have read the submission from the Conservation Volunteers, who I also assume are a group of people who have intimate and expert knowledge gathered from years of working in the area and observing the activities of the birds. I would place significant weight on their submission.

The application states that overall, the ecological assessment concludes that with the avoidance and mitigation methods applied to the proposal, the effects on avifauna, including tāiko, will be low, or no more than minor in nature – which are they Low or no more than minor?

It also states that the adverse on threatened and at risk species will be avoided – but this is subject to adherence to over 110 complex consent conditions.

In this context I can see no pathway to grant this application.