

**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
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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	Royal Forest & Bird Protection Society of New Zealand Inc. (Forest & Bird)		
Postal address	[REDACTED]		
I am the owner/occupier (delete one) of the following property:			
Primary contact person/s	Nicky Snoyink - Regional Conservation Manager Canterbury/West Coast		
Email address	[REDACTED]		
Phone number/s	Home:	[REDACTED]	Business:
	Mobile:	[REDACTED]	Fax:

Signature of the submitter (or person authorised to sign on behalf of the submitter):	Date:
	13 October 2023
Name (BLOCK CAPITALS):	
NICKY SNOYINK	

*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

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

The whole application.

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).*
Please see attached submission.

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

Forest & Bird seeks that the application is declined in its entirety.

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

*Select one.

*I 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/~~to 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.

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 and Grey District 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.

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@wcrc.govt.nz Website www.wcrc.govt.nz	Grey District Council 105 Tainui Street PO Box 382 Greymouth, 7840 planning@greydc.govt.nz 03 769 8600
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Note to submitter

If you are making a submission to the Environmental Protection Authority, you should use form 16B.

The closing date for serving submissions on the consent authority is the 20th working day after the date on which public or limited notification is given. If the application is subject to limited notification, the consent authority may adopt an earlier closing date for submissions once the consent authority receives responses from all affected persons.

You must serve a copy of your submission on the applicant as soon as is reasonably practicable after you have served your submission on the consent authority.

If you are a trade competitor, your right to make a submission may be limited by the trade competition provisions in Part 11A of the Resource Management Act 1991.

If you make a request under section 100A of the Resource Management Act 1991, you must do so in writing no later than 5 working days after the close of submissions and you may be liable to meet or contribute to the costs of the hearings commissioner or commissioners. You may not make a request under section 100A of the Resource Management Act 1991 in relation to an application for a coastal permit to carry out an activity that a regional coastal plan describes as a restricted coastal activity.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious;
- it discloses no reasonable or relevant case;
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further;
- it contains offensive language;
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.



Forest & Bird

TE REO O TE TAIAO | *Giving Nature a Voice*

13 October 2023

As an attachment to the completed Form 13 please find Forest & Bird Submission to the West Coast Regional Council and the Grey District Council on **TIGA Minerals and Metals Ltd resource consents:**

Consent Authority	Consent Type	Reason for Consent
WCRC	Land Use Consent	For earthworks and vegetation clearance, including within a coastal environment and mining within 100 metres of a wetland.
WCRC	Discharge Permit	To discharge water and stormwater to land and surface water.
WCRC	Discharge Permit	To discharge dust to air.
WCRC	Water Take Permit	To take and use ground and surface water for mining and associated activities.
Consent Authority	Consent Type	Reason for Consent
GDC	Land Use Consent	To breach district plan rules in relation to building height, hazardous substances, car-parking, vehicle movements, noise, floor area, earthworks and clearance of indigenous vegetation.

Forest & Bird opposes this consent application in its entirety for the following reasons:

1. The activity will likely have adverse effects on indigenous vegetation and habitat for indigenous fauna, on the natural landscape, and on freshwater ecosystems and the coastal marine area, and the native species that live in these environments, and the native species that use the area and its surrounds to breed and feed.

2. Forest & Bird is the owner of the 27-hectare Dick Jackson Memorial Reserve, located south of Punakaiki and surrounded by the Paparoa National Park and Te Ara Taiko Nature Reserve. The Dick Jackson Memorial Reserve is a native forested reserve which is home to the Westland Black petrel and ecologically, is connected to a larger reserve that is the world's only breeding area for the Westland Black petrel. This site is of global significance. Considering this site's global significance there is a strong imperative to ensure that it is protected from any and all harmful effects.
3. While we acknowledge that the mining activity may have economic benefits to the West Coast region, we are concerned that these benefits will not outweigh the potentially adverse economic and social effects on the local community and the nature-based economic activities, particularly those that have established in the area as a result of the Paparoa National Park and other protected natural areas in the West Coast region.
4. The activity is inconsistent with:
 - The New Zealand Coastal Policy Statement 2010
 - The National Policy Statement for Indigenous Biodiversity 2023
 - The National Policy Statement for Freshwater Management 2020
 - The Resource Management Act 1991, specifically part 2 sections 5, 6a-c and potentially d, and 7
 - The West Coast Regional Policy Statement, specifically Chapters 7, 7A, 7B, 8, 9, and 11.
 - The Grey District Plan and the proposed Te Tai o Poutini One Plan
5. The proposal seems to be at odds with Te Whanaketanga Te Tai Poutini West Coast Strategy 2050, which has a key aim of improving the wellbeing of ALL Coasters.
6. Forest & Bird also considers that the activity is inconsistent with Aotearoa New Zealand's Emissions Reduction Plan as required by the Climate Change Response Act 2002.

Forest & Bird seeks that these resources consents are **DECLINED** in their entirety.

Forest & Bird wishes to be heard.

Thank you for the opportunity to submit.

Nicky Snoyink
Regional Conservation Manager Canterbury/West Coast
Forest & Bird

