

**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:

TiGa Minerals and Metals Ltd

DESCRIPTION OF PROPOSED ACTIVITY:

MINERAL SAND MINING ACTIVITIES

LOCATION:

BARRYTOWN

PART B: SUBMITTER DETAILS

Full name/s	Kevin John Klempel		
Postal address	[REDACTED]		
I am the owner/occupier (delete one) of the following property:	[REDACTED]		
Primary contact person/s	Kevin Klempel		
Email address	[REDACTED]		
Phone number/s	Home:	<input type="text"/>	Business:
	Mobile:	<input type="text"/>	Fax:

Signature:		Date:	<input type="text" value="12th October 2023"/>
Name (BLOCK CAPITALS):	<input type="text" value="KEVIN J KLEMPEL"/>		

*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)

Refer to attached Word Document

Submission opposed to Application by TIGA Minerals limited to mine sand at Barrytown.doc

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

I would ask that you reject this submission as presented and if you find you are tempted to consider it to first have a full and independent expert assessment of all claims made by this company prior to proceeding to a final determination. If you then still feel that you will proceed you must impose a bond of such significant size as to mitigate the damage that the community will suffer either during operation or as a result of the possible venture failure and to cover the full social remediation following closure of this " short term venture" .

Further I would ask that this application be subjected to a full and independent review from an agency external to the local councils.

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.



THE WEST COAST
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This Submission is opposed to Application by TIGA Minerals limited to mine sand at Barrytown as set out in the current application

My objection to this plan is framed around two primary concerns which can be best summarised as loss.

We have developed an addiction to mining in Westland and like any addiction it is eating away at us and like all addicts who cannot reform it will continue until there is nothing left to live (mine) for. In the words of Joni Mitchell “You don’t know what you have until it’s gone”, and so it seems it is for many of us in Westland.

The first, more basic, loss is to all of us who pay for the road network in this country – I pay you profit and I get a bad road in return. Why am I paying for private profit to be shipped to a large extent offshore? Sure we will get a few short term cream cakes “the baubles of office” exclaimed one prominent Politician some time back and how close to the mark is that I wonder.

The company proposes to truck mineral concentrates to either Westport or Greymouth and so to maximise efficiency one can plan for it to be maximum truck loads for each trip, 40,000kg, unless of course there is a bridge limit or two. No matter, trucking companies and trucks in general do not pay for the damage that they do to our roads. Truck owner’s complain about their costs but the known reality is that truckers don’t pay the true cost of the damage that they do to our roads. To quote

Tuesday, 13 December 2022, 2:12 pm - Press Release: [Dog And Lemon Guide](#)

Excluding events such as storm damage, about 80% of all road maintenance costs are the result of the damage caused by trucks.”

“Yet, the trucking industry pays less than 23% of the costs of building and maintaining these highways.”

The current proposal to truck to wherever is going to cost every other road user and taxpayer in New Zealand a massive subsidy to this company to damage what is already an at risk road network, a vital arterial network (The Coast Road) for the operating of all manner of other business and private activity. Do I object, yes I most certainly do, and I certainly do not wish to pay a subsidy to overseas ownership for overseas profit for the few baubles that may come our way, no matter what they are they will not match the cost of the damage caused by this one activity alone, let alone the other damages that they propose to create. Some local businesses may well profit from this activity and I am sure that they will see a motive to support this operation but I submit that many more will lose and should they be subjected to this abuse of a power imbalance, especially at local government level,

One other question, should the road be damaged beyond repair or put out of commission for long periods of time, can this company sustain the losses they are likely to incur waiting and what happens if they have to walk away when those losses become too great? Their whole enterprise revolves around having a workable road and it is well known that this road is vulnerable to climatic weather events. The climate is changing, that is a fact, the cause is for now not part of this argument, but climate events are worsening and this road is along an exposed coastline subject to

slipping and erosion. Their trucks will not improve this situation and we have been given a recent warning to the potential for major damage with Cyclone Gabrielle. It is not a case of if, just when.

The second loss that I see is a wider loss to the community in the form of a boom and bust cycle. TiGa say that this proposal is for no more than 12 years, and this is a social benefit, no it is not, it's a one hit wonder, especially when you consider that 50 years is the now current consenting design life for a building consent. Who builds a community for a no more than 12 year cycle. Those of us who have spent generations living and working on the Coast have seen numerous boom and bust cycles and at the end of each one the region is progressively worse off, why would we approve yet another short term maybe boom to then deal with the longer term collapse that follows, it makes no sense. A short inflationary boom in property sales, if you can find one, a diversion of labour from longer term more resilient employment to a short term market employment shift followed by the then longer term drag of oversupply of property and employee's leading to rising unemployment as the mine closes: is that really progress. Is this mine really going to make that much difference to the supply of product in the word that it is worth dislocating the local economy to achieve it?

BUT TiGa also note in their application that:

5.8 The proposed Barrytown mining project is stage one of TiGa's wider plans for mineral sand mining on the Barrytown flats. The wider operation will bring significant social benefits to the West Coast region.

So are we consenting a small mine or is this the Trojan horse for a larger operation yet to come which it seems to be. Certainly this document and commentary in the local press indicate to me that this is mining by stealth, make it look small, make it look inconsequential but in the end plan to take it all. Small amounts of environmental damage can be made to look minor but what really is the extent of the mining proposal that is being applied for here?

So is it a 12 year mine, finish and walk away as is being applied for or is it, TiGa's words;-

5.11 The proposed activity will also create social and community benefits as a flow on effect of job creation and economic activity. Flow on effects will benefit things like schools, sports and other clubs and activities.

To achieve this lofty aim will take more than "up to 12 years" so if this is the case why we are not dealing with the full extent of this proposed operation so that the true extent of the gains or loss's to the region and more importantly the local environment can be measured, evaluated and then judged.

So is to be boom and bust economics, or is it a significant environmental change encompassing a far wider area than this consent seeks. If it's the later then why are we not dealing with the effects of that now? On either count I must object most strongly.

Why would I object to a mine on private already modified land on the basis of damage to the natural environment. Why because it is a **consequential loss** and in the words of TiGa's own submission. I refer in particular but not only to their documents sections 2.6, 2.22, 4.15, 5.58 and 5.64. These and other sections imply an effect outside of the mined area and a suggestion as to how those effects will be minimal or mitigated. Unfortunately the West Coast Regional council has a recent poor

record of taking the word of the applicant and not properly reviewing claims made in applications with serious consequences. Without any assurance of suitable independent peer reviews of the claims made by the applicant prior to a final consideration of this application and publication of those review's, proceeding to mine anything exposes the council and by association, as a ratepayer, myself and others to potential financial risk and loss.

I must also raise a question in relation to the effects of sea level rise and climate change. The Barrytown area has been identified by NIWA as being an area that will be reasonably geologically stable, i.e. the land will not greatly rise or fall above current levels. For detailed information I refer to their public web information

<https://searise.takiwa.co/map/6233f47872b8190018373db9/embed>

TiGa are properly intending to maintain a buffer viz

5.55 Maintenance of a 20 m buffer from the edge of mining to the lagoon area. This boundary is to be permanently marked so as to avoid crossing it inadvertently.

but as can be seen this is not to account for sea level rise but in the interests of maintaining a coastal buffer area to sweeten the application pie as it were. My first concern would be given the amount of coastal erosion that has taken place along the southern end of the Barrytown flats beach has the future impact of erosion on the coastline adjacent to this mine site and future hinted at mine sites been included in the councils assessment of this application and will it be if it has not, for it should be. Continuing on I would note

TiGa Barrytown Mine Consent APPLICATION - REQUEST FOR INFORMATION – GEOTECHNICAL
Item 34 section 6.1

Freeboard of >3m is with reference to the original ground level. Freeboard is based on the assumption that 30% of the volume of material will be extracted as "ore". This means that there will always be a deficit in the volume of the backfill (tailings), resulting in freeboard. We understand that extraction is now more likely ~20%. At 10m depth of mining, freeboard will be ~2m, at 15m freeboard will be 3m.

Sea level rise in itself will be gradual but it is the effect of storm systems on the adjacent coast that is the most concerning. I would refer the council to another of NIWA's published web information for detail of effect.

<https://niwa.co.nz/natural-hazards/hazards/sea-levels-and-sea-level-rise#:~:text=NZ%20SeaRise%20maps&text=Climate%20change%20and%20warming%20temperature,Greenland%20and%20Antarctic%20ice%20sheets>

Are we going to be left with a subsided ground profile, subject to future storm and sea level rise inundation as the coast erodes with the subsequent loss of productive farmland to what is in essence a one shot wonder. I cannot support short term gain for the loss of both productive farmland and the very real potential to lose more of what are already rare and endangered environmental features on the Barrytown flats if this Trogan horse does proceed. Non mining application reports have been produced over the years on this area and reference to these must be considered should this application be considered as being an introduction to a wider mining regime.

And an earlier undated report

Whitebait to White Paint: Maher Swamp on the Barrytown lowland (North Westland) its history and prospect – authored by R.O. Gardner.

It would also do the commissioners and planners well to read “Nga Uruora” by Geoff Park, a crown research scientist among other roll’s and I would refer you especially to Section 6, The Sandplain Forrest which deals directly and specifically with this area of the region.

I finish as I started with variation, We do know what we will lose, once it’s gone, it’s just that some of us don’t want to acknowledge it.

Once it’s gone there is no getting it back.

I would ask that you reject this submission as presented and if you find you are tempted to consider it to first have a full and independent expert assessment of all claims made by this company prior to proceeding to a final determination. If you then still feel that you will proceed you must impose a bond of such significant size as to mitigate the damage that the community will suffer either during operation or as a result of the possible venture failure and to cover the full social remediation following closure of this “short term venture”.

Kevin Klempel

Moana

12th October 2023