

**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

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	Conservation Volunteers New Zealand		
Postal address	[REDACTED]		
I am the owner /occupier (delete one) of the following property:	[REDACTED]		
Primary contact person/s	Genna Thomson		
Email address	[REDACTED]		
Phone number/s	Home:	-	Business:
	Mobile:	[REDACTED]	Fax:

Signature:	Date:
	9 October 2023
Name (BLOCK CAPITALS):	
GENNA THOMSON	

*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 *N/A.* 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 *N/A.* 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)

See attached submission

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

See attached submission

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.



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@wcr.govt.nz
Website www.wcrc.govt.nz

9 October 2023

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PART A: DESCRIPTION OF APPLICATION

CONSENT NUMBER: WCRC: RC-2023-0046, GDC: LUN3154/23

APPLICANT: TIGA MINERALS AND METALS LTD

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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: Conservation Volunteers New Zealand

Postal address:

We are the occupier of the following property:

Primary contact person/s: Genna Thomson, Project Manager

Email address:

Phone numbers:

Mobile:

Business:

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

Date: 9 October 2023

Name (BLOCK CAPITALS):


GENNA THOMSON

We neither support nor oppose the application

We DO NOT wish to be heard and hereby make our submission in writing only.

We **have** served a copy of our submission on the Applicant as per Section 96(6)(b) of the RMA

We are not a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

We 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.

Submission

Conservation Volunteers New Zealand (CVNZ) is a charitable trust and has been operating in New Zealand since 2006. The Punakaiki Coastal Restoration Project site was started in 2008 for the purpose of replanting 75 hectares of coastal land which was formerly used for mining and farming. The project was established as a partnership between CVNZ, Department of Conservation (DOC), Rio Tinto and Lincoln University, with the land gifted to the Department of Conservation by Rio Tinto in recognition of its conservation significance. The land was subsequently gazetted as a Nature Reserve - Te Ara Tāiko Nature Reserve.

The significance of this site is the proximity to the breeding colonies for the Westland petrel tāiko which is an endangered species and of global significance. The Westland Petrel Special Protected Area is a five kilometre stretch of cliffs along the Barrytown flats and this is the only place in the world that these seabirds breed. They are extremely vulnerable to environmental pressures. Backing onto the Paparoa National Park, the vision of the CVNZ restoration project is to create a continuous mountain-to-sea forest corridor to protect the Westland petrels' habitat. More than 208,000 native trees have been planted in the nature reserve with the intention of re-creating the sandplain forest which grew here before colonial settlement. An ancient remnant of the sandplain forest, the Nikau Scenic Reserve grows alongside our site.

CVNZ has a long term commitment to the West Coast and the Barrytown community with our project running for more than 14 years now, as well as other projects around the Coast. In addition to this, we have ongoing contracts doing planting restoration at Bullock Creek Farm and Wadeson Island in Hokitika, through DOC's Jobs for Nature programme and its Restoring Nature Fund. We employ 16 people, who all have a strong commitment to the conservation and restoration of this beautiful environment and a number of them live in the Barrytown area. Whether they were born on the Coast or have come here from elsewhere, every one of our staff members is concerned and interested in preserving and enhancing this land and its surroundings. We have a long association with the Barrytown School, its past and present students, as well as their families; particularly so as it was Barrytown School students who alerted the scientific world to the presence of the Westland petrel in 1946. We have been closely involved with the Tāiko Festival (formerly the Return of the Westland Petrel Festival) which ran every year in April or May until 2021, celebrating the annual return of the Westland petrel to its breeding colonies. Through the many community planting events which have been run since the Punakaiki Coastal Restoration Project began, thousands of Coasters, New Zealanders and international volunteers have contributed to the planting and recovery of this habitat.

As a local employer and community partner, CVNZ neither supports nor opposes the consent application by TiGa to mine the Barrytown site. However we wish to draw the Local Authority's attention to the following areas of concern in relation to the proposed mining as we believe these represent significant effects, as follows:

- **Traffic and Road Management**

The proposed transport of the Heavy Mineral Concentrate along the Coast Road with 50 movements of trucks and trailers every day plus up to 140 workforce traffic movements poses a significant threat to the safety and maintenance of what is already a dangerous road. The Coast Road is frequently closed either fully or partially due to landslides, rock slope failure, debris flow, flooding and coastal erosion and the resultant roadworks required to keep this vital road system open. This additional heavy traffic, regardless of whether it is travelling north or south will seriously impact the safety of all roadusers. We transport staff every day from Greymouth and this proposed additional traffic is of great concern to their wellbeing as on a weekly basis there can be close calls with large vehicles, tourists and locals at any stage on the road but particularly so on the many narrow and tight corners which predominate on

State Highway 6. As mentioned in the 1 May 2021 Stuff article link here, these roads are the most dangerous in the country.

<https://www.stuff.co.nz/national/124767209/the-west-coasts-deadly-roads-onelane-bridges-narrow-roads-inexperienced-drivers>

This traffic will also pose a significant threat to the Westland petrel tāiko which are present on the Barrytown flats area every year from March through to January. They are vulnerable to lighting distraction from dusk till dawn to the extent that the Punakaiki village lights are all turned off at night during the critical fledging period of November to January. The additional road traffic resulting from the mine operations site and Heavy Mineral Concentrate transport will pose their own lighting distraction to the Coast road. It has been widely documented that this threat can cover an area as far south as Greymouth town, as per the December 2020 Radio New Zealand article shown on this link – <https://www.rnz.co.nz/news/national/433509/crashing-petrels-moving-south-as-lights-dimmed-in-punakaiki>.

It should also be considered that the little blue penguin nests along the Barrytown flats to the north and south of the proposed mining area. They are in decline and need as much protection as possible on the West Coast. The proposed traffic generated from the mining would pose an increased threat to them.

- **Plant Operations**

To preserve the wellbeing of the Westland petrel tāiko it is important that a dark sky is maintained and we do not agree with the current proposal by the mining applicant to run the processing plant 24 hours/ seven days a week. Operating at this level with the lighting and noise effects will impact the local community, the wellbeing of the mine's employees and their families, the Westland petrel, farm animals and other fauna in the area including the wetland bird species in the adjacent lagoon areas.

Mining is a recognised threat to the Westland petrel tāiko, as documented in the the 2016 "Review of the biology and ecology and an evaluation of threats to the Westland petrel *Procellaria westlandica*" report carried out on behalf of the West Coast Penguin Trust. <https://www.westcoastpenguintrust.org.nz/wp-content/uploads/2018/09/Westland-petrel-threats-report-June-2016-Kerry-Jayne-Wilson.pdf>

To reduce the significant effects of the transport and mining plant operations, these activities should only take place during daylight hours.

- **Environmental Impact**

The mining approach proposed by TiGa at Barrytown is untried in New Zealand and we have concerns about an unproven method being employed in a fragile coastal environment which is shown in the proposed Te Tai o Poutini Plan as zoned for Coastal Setback, Coastal Tsunami Hazard and Coastal Alert. At our CVNZ site [REDACTED] we are observing significant coastal erosion happening with more and more of the bushclad shoreline being eaten away with storms and high tides. We believe there is a high probability of more than minor effects on the coastline and the lagoons and waterways around the mining site, as a result of the significant topsoil, ore and overburden extraction proposed by TiGa. We would ask that any hydrological management plan provide for independent oversight to ensure that the waterways, lagoons and coastline around the mining area are not adversely affected by the processing operations and subsequent storage of contaminated water and overburden.

This is also of concern in relation to the Punakaiki Marine Reserve which is a short distance from the proposed mine site and part of a Coastal Protection Area. Established in 2013, the marine reserve's southern boundary is on the north side of Burke Road, and it covers 35 square km of sea and the foreshore. This marine reserve and the sea north of it up to Seal Island near Fox River are part of a Coastal Protection Area (CPAs), as "listed in the Department of Conservation (DOC) Schedule 3H – Coastal Protection Areas (Figure 3-1, Table 3-1)". As described in the NIWA report below from 2019,

“CPAs are areas below Mean High Water Springs that are considered to be of regional, national or international importance in terms of their ecological features. Values found adjacent to the coastal marine area that could be adversely affected by activities are also identified, for example dune or shingle beach ridge communities.”

<https://www.envirolink.govt.nz/assets/1928-WCRC175-Assessment-of-West-Coast-Region-coastal-sites-against-indigenous-ecological-significance-criteria.pdf>

The eight criteria that each Coastal Protection Area is evaluated against are:

1. Species of conservation concern;
2. Important area for life history stage;
3. Representativeness;
4. Unique and rare habitat [or ecosystems];
5. Restricted-range species;
6. Biological diversity;
7. Ecological integrity; and
8. Fragile and sensitive habitat.

The Coastal Protection Area 8 which is Punakaiki Coastline (Seal Island to Perpendicular Point to Dolomite Point and Punakaiki Marine Reserve and recreational fishing areas) met the following criteria, as follows:

- Species of conservation concern - Waterfowl and indigenous waders. Known taxa of concern include whitefronted tern, Westland petrel, sooty shearwater, fairy prion, banded dotterel, little blue penguin; other species observed include: redbilled gull
- Important area for life history stage - NZ fur seal haul out; little blue penguin nesting; Roosting, nesting, feeding of waterfowl and waders
- Representativeness - Outstanding natural feature and landscape of Dolomite Point and its Putai Blowhole
- Biological diversity - Diversity of habitats: wide open coastal rocky and gravel shores, offshore bull kelp forests, sandy habitats
- Fragile and sensitive habitat - Significant risk of sea level rise to narrow shoreline; invasive vegetation

It could be argued that in the case of the Westland petrel, the Punakaiki Coastal Protection Area also rates significance from the viewpoint of Restricted-range species; as inland from this coastline is the only place in the world that this seabird breeds. This would therefore make this CPA a more critical area to protect. Restricted-range species relates to “An area inhabited by a species that has a restricted geographic distribution. If naturally restricted this is an ‘endemic’ species. (Also) Habitats of indigenous species where the species are at the limit of their natural range, or are naturally rare. Environment Court guidance criteria is Vulnerability, Diversity”.

Other wildlife species found in the Punakaiki Marine Reserve and along the Barrytown coastline include the White heron kōtuku and Australian bittern matuku (both visitors to the coastal lagoons and wetlands), the endangered Hector’s dolphins, albatrosses, shags, terns and gannets.

That the Barrytown flats is overall a high value and vulnerable environment is reinforced by the number of Significant Natural Areas (six are mentioned in the proposed Te Tai o Poutini Plan) and gazetted DOC reserves in its surroundings, in addition to the Paparoa National Park, Punakaiki Marine Reserve and Punakaiki Coastal Protection Area, including:

- Canoe Creek Lagoon Significant Natural Area and the wetland immediately north of the proposed mine area is also a Significant Natural Area – an L shaped pond clearly visible in maps of the site
- Langridge Scenic Reserve – south of the proposed mine site

- Scheduled 1 and 2 Wetland – Maher Swamp
- Waiwhero Scenic Reserve
- Nikau Scenic Reserve
- Te Ara Tāiko Nature Reserve
- Westland Petrel Special Protected Area
- NZ Forest and Bird Dick Jackson Scenic Reserve

Based on the significant effects and concerns raised in this submission, we believe there are risks to the Barrytown community, the environment and its flora and fauna, the State Highway 6 road and its users, and the wider West Coast community which have not been sufficiently addressed by the mining applicant in this consent application. We request that the Local Authority require changes to the resource consent application to mitigate the transport adverse effects and environmental impacts, and that the processing of mined material is only permitted to operate during daylight hours.

Thank you for your attention to this matter.

Yours faithfully

A handwritten signature in blue ink, appearing to read 'Genna Thomson', with a long horizontal flourish extending to the right.

Genna Thomson
Project Manager