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Brad Thomson  
Mahaanui Kurataiao Ltd  
PO Box 3246  
Christchurch

By email

Kia ora Brad

**Re: Te Aromatawai Ahurea Cultural Impact Assessment Canterbury Coal Mine Consents**

This letter is to firstly acknowledge and thank you and Craig for the above CIA. We appreciate the effort and detail that has gone into this and it will be helpful not only for the existing consenting work, but as a basis for moving forward and establishing regular engagement around any future development at the site.

Bathurst Coal Limited (BCL) do wish however, to provide some further clarification around some of the matters raised in this report. Primarily to avoid any misconceptions during consent processing. We do not consider that the report needs to be updated or modified so long as this letter is recorded for future reference, and a copy will be forwarded with the report to both SDC and ECAN.

*Section 3.1 Engagement with Manawhenua*

BCL did engage further with MKT following the initial Hui and site visit in 2017. Some BCL staff (Fiona Bartier, Paul Feaver and Campbell Robertson) attended a hui at the MKT offices on 5 March 2018 where a presentation was made about our current and planned operations. Further information was also provided on the ecology of the Waianiwaniwa Stream. At the time, the Kaitiaki Portfolio Committee were invited for a site visit, but it was considered that this would be better left until there was a further suite of consent applications to consider.

BCL acknowledges that it should have consulted with MKT prior to lodging these consent applications in November 2018 but as advised and agreed in earlier consultation, the intention was to consult when applying for a new stage of development. BCL has remained of the view that these consent applications are for activities already consented. A copy of the consent application was forwarded to MKT and a subsequent meeting was arranged to discuss the application and the requirements for a CIA. BCL was advised in November 2018 that the Runanga did want to provide feedback on the application and the process was initiated that has lead to the development of this CIA.

No draft CIA was forwarded to BCL for consideration or comment.

#### *4.1 Kaitiakitanga – Recognition of Manawhenua*

BCL supports the suggestion of further meaningful consultation on all aspects of the operation. However all water monitoring reports, and Annual Work Plans are forwarded to MKT as is required by the existing consent conditions.

#### *4.2 Ranginui - Air*

While recommendation 5 is beyond the scope of the RMA, Bathurst Resources Ltd (BRL) as the parent company, takes this matter seriously. BRL measures and reports on Scope 1 and Scope 2 emissions in its annual report and has implemented an active renewable energy project looking at a range of mechanisms to reduce emissions from vehicle fleets. In addition, there are some substantial biodiversity offset projects underway on the West Coast that have a net benefit for both biodiversity and carbon capture.

#### *4.3 Paptuanuku - Land*

As mentioned above, BCL already provides monitoring reports and non-compliances to MKT on a regular basis.

#### *4.4 Waimaori - Land*

While a copy of this CIA and letter will be provided to ECAN as requested, MKT was consulted on the Tara Wetland consent applications and at the time advised BCL that the preference was to deal directly with ECAN. In addition, Mananui Ramsden who was employed by ECAN had been on a site visit to the mine and had visited the wetland during the consenting phase and provided advice to the consenting team on this matter.

As indicated, we will forward a copy of this letter with the CIA to both SDC and ECAN, and appreciated the advice provided. We look forward to continuing to work with MKT and the Runanga on matters associated with the Canterbury Coal Mine and surrounding area.

Ngä Mihi,



Campbell Robertson  
Environmental Manager

Cc Jesse Burgess, Selwyn District Council  
Catherine De Graff, Canterbury Regional Council