

From:
To: [Hearings](#)
Cc: [Edwina White](#)
Subject: Notifications Consent Submission: Group 542
Date: Sunday, 17 May 2020 4:04:24 PM

Group ID: 542

Consent name: Bathurst Coal Limited

Consent number: CRC184166, CRC200500, CRC201366, CRC201367, CRC201368, CRC203016, RC185622

Name: Michael David Currie

Care of:

Mailing address 1:

Mailing address 2:

Suburb:

Town/City:

Post-code:

Country:

Mobile phone:

Work phone:

Home phone:

Email:

Contact by email: Yes

Is a trade competitor: No

Directly affected: Yes

Consent support/hearing details

- CRC184166: oppose | NOT to be heard | will NOT consider joint hearing
- CRC200500: oppose | NOT to be heard | will NOT consider joint hearing
- CRC201366: oppose | NOT to be heard | will NOT consider joint hearing
- CRC201367: oppose | NOT to be heard | will NOT consider joint hearing
- CRC201368: oppose | NOT to be heard | will NOT consider joint hearing
- CRC203016: oppose | NOT to be heard | will NOT consider joint hearing
- RC185622: oppose | NOT to be heard | will NOT consider joint hearing

Reasons comment:

Environment Canterbury and Christchurch City Council have declared a Climate

Emergency. Even though the RMA does not currently allow climate effects to be considered, the Environment Select Committee has initiated changes to the RMA to bring it into line with the Zero Carbon Act. Bearing this in mind it would be folly to exclude consideration of climate change in assessment of these consent applications. We must provide a just transition away from fossil fuels, for this reason alone the applications should be declined to avoid damaging the health of the planet and its inhabitants with the worsening climatic effect of fossil fuel usage. Bathurst has a double-edged sword with its continuing supply of the low-grade coal from the Coalgate mine to Fonterra for use in its milk processing plants to dehydrate milk. The income received from this is allowing Bathurst to pursue its aim of mining the West Coast native forest (e.g. Denniston) for high grade coking coal for export. If this is allowed to happen it will cause significant environmental degradation and a threat to biodiversity. As well as the impact on the local environment and indigenous biodiversity, Selwyn D.C's own Notification decision report identified the impact of the 24/6 operation with its associated noise and dust, pollution of local waterway, landscape effects and overall amenity values as being more than minor. Bathurst has also repeatedly failed to provide the required information on these issues. As noted above, 90% of this low-grade coal goes to Fonterra dairy factories. Their commercial model for intensive dairy requires a degree of irrigation, fertiliser use and livestock overstocking that is harmful to both the natural environment and human health. Bathurst has repeatedly breached their current consents with Selwyn DC, especially their consent to mine 20,000 tonnes per year – Bathurst have been extracting 100,000 tonnes per year for a considerable time – 500% over the consented rate! In addition to the extraction rate breach, Bathurst have repeatedly breached their existing consents for discharge to local waterways that are the habitat of the endangered Canterbury mudfish. The receiving environment for discharge is the Selwyn Waikirikiri River whose catchment is overallocated in terms of pollution and water extraction. The river discharges into Lake Ellesmere Te Waihora. Considerable public money has been spent on rehabilitating Te Waihora with not a cent coming from Bathurst. This operation is causing considerable degradation to:

- Wetlands
- Critically endangered species
- Fresh water quality

It makes no sense to approve Bathurst Coal Ltd's application for consents to expand its open-cast coal mine operation at Coalgate when it continually breaches its current consents and makes no attempt to rehabilitate and/or remediate these breaches. Allowing it to proceed will only make matters worse. These applications must be declined and the current consents revoked. Especially in view of all that I have said above, and also in terms of the Zero Carbon Act, which will outlaw future operations of this type. Consider – does granting of these consents fulfil the purpose of the Resource Management Act? Remember the fundamental requirement of the commissioners assessing these applications is to protect our environment. Should these consents be granted, the conditions should include:

- Short duration of say, 5 years. A longer duration would be inappropriate in terms of the changing environmental landscape
- Phasing in of new working areas in small increments, not to proceed until the completed working area has been rehabilitated to a high standard
- A bond for several million must be in place to ensure restoration of the landscape, remediate damage, etc. in the (probable) event of non-compliance by Bathurst
- An Environmental Management Plan to be submitted and approved prior to any new work commencing

Consent comment:

To decline all consent applications and revoke the existing consents