

**From:**  
**To:** [Hearings](#)  
**Cc:** [Edwina White](#)  
**Subject:** Notifications Consent Submission: Group 542  
**Date:** Monday, 18 May 2020 11:55:54 AM  
**Attachments:** [Coalgate-Mine-submission3.docx](#)

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**Group ID: 542**

**Consent name:** Bathurst Coal Limited

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

**Name:** Zella Downing

**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:** No

**Consent support/hearing details**

- CRC184166: oppose | WANT to be heard | WILL consider a joint hearing
- CRC200500: oppose | WANT to be heard | WILL consider a joint hearing
- CRC201366: oppose | WANT to be heard | WILL consider a joint hearing
- CRC201367: oppose | WANT to be heard | WILL consider a joint hearing
- CRC201368: oppose | WANT to be heard | WILL consider a joint hearing
- CRC203016: oppose | WANT to be heard | WILL consider a joint hearing
- RC185622: oppose | WANT to be heard | WILL consider a joint hearing

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**Reasons comment:**

It is irresponsible to extend coal mining operations when there is already far more carbon in existing fossil fuel reserves than we can safely burn, and further intensifying the dairy industry is grossly irresponsible.

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**Consent comment:**

This project should not proceed, and this hearing should reject these applications.

Coal fuelled the Industrial Revolution...over 150 years ago! Surely our advance into the "Technological Age" requires us to relinquish our weary reliance on coal and encourage development of the renewable options available in the year 2020.

I strongly oppose each application for resource consent, as well as the overall expansion of the mine.

1. Burning and digging coal is known to cause harm to the environment and to human health; it is also the single biggest contributor to anthropogenic climate change.
  - 1.1. Approving new and expanded coal mines is contrary to New Zealand's international and domestic commitments to reduce greenhouse gas emissions.
  - 1.2. The law hasn't caught up with scientific fact, but scientific fact and public opinion must be taken into consideration:
    - 1.2.1. The section of the RMA that expressly disallows the consideration of climate impact is currently under review. The *law* is trying to catch up with science. While the RMA's clauses allowing the consideration of climate change are not yet active, the passing of the Zero Carbon Act in 2019 is a clear signal that a fast and genuine decarbonization of our economy is beginning.
    - 1.2.2. In 2019 ECan declared a climate emergency and agreed to act on it in all its activities. To allow the expansion of coal mining makes a mockery of this declaration.
    - 1.2.3. Lawyers for Climate Action NZ have stated that there is sufficient precedent to challenge governments on their climate policy. They cite examples showing that courts from around the world are charging governments with failing to fulfil their legal duties to prevent catastrophic climate change.
    - 1.2.4. Nothing prevents ECan from making a decision based upon New Zealand's acceptance of the need to reduce carbon emissions demonstrated by our signing of the Paris Agreement.
2. Bathurst Coal Ltd. has demonstrated that it is unwilling or unable to take full responsibility for the legal requirements set in place when consent is awarded. The applicant has repeatedly breached resource consent conditions for the existing Coalgate mines.
  - 2.1. The re-occurring violations mark a disturbing disdain for the legal process which allows it to profit from removing natural resources from the earth.
  - 2.2. Sediment run-off, erosion and unauthorised discharge into waterways are serious breaches of their consent conditions.
  - 2.3. Repeatedly violating consent demonstrates an ingrained, almost wilful, disdain for the resource consent process. The company's apparent disregard for the natural habitat and established ecosystem found just outside the boundary of their coal mine is perplexing and should raise alarm.



3. Bathurst has wilfully or ineptly omitted information in their application that would allow officers to assess whether an environmental effect is minor or more than minor.
  - 3.1. According to the Selwyn District Council S95A-E report (Table 3) - Summary of overall conclusions on adverse effects on the wider environment (p. 90) - insufficient information provided by the applicant has been frequently listed as a reason why officers have not been able to make a final determination on whether effects are minor or more than minor.
  - 3.2. Effects that are *more than minor* are key to RMA decision making.
  - 3.3. Despite insufficient information, many effects were more than minor, or likely to be more than minor.
    - 3.3.1. indigenous biodiversity
    - 3.3.2. cultural values
    - 3.3.3. glare and sky glow
    - 3.3.4. landscape
    - 3.3.5. overall amenity values
4. Canterbury Coal Mine produces sub-bituminous coal sold primarily to local dairy factories, schools and other organisations for heating.
  - 4.1. Fonterra has announced that it is moving away from coal. It has stated that it will not install any new coal boilers and is already trialling alternatives.
  - 4.2. New Zealand has set a net zero by 2050 carbon target, so anyone burning coal will have to re-think their options.
  - 4.3. Schools, hospitals and universities are already replacing coal boilers with non-coal alternatives. Burwood Hospital is a case in point.
5. The mine supports unsustainable farming practices on the Canterbury plains.
  - 5.1. News reports show that the applicant plans to increase production by 30%. A 30% increase in coal use implies a 30% increase in milk production. There is growing substantial evidence that intensive farming is causing serious harm to the environment and to human health.
    - 5.1.1. Overstocking, intensive irrigation and high use of nitrogenous fertiliser cause harm to both water supply and water quality in Canterbury.
    - 5.1.2. Intensive farming practices (which include using coal to dry milk into powder) are unsustainable and incompatible with the health of our land. Monoculture farming leads to a loss of biodiversity. Nitrates in the groundwater harm many animal species and people. Animals suffer due to a lack of shelterbelts, overcrowding (leading to disease) and an unintended disregard of basic animal husbandry practices which are forfeited to increased productivity.
    - 5.1.3. Intensive dairy farming on the Canterbury Plains is a threat to New Zealand's food security. This area is naturally suited to wheat and grain growing, which were once grown in this region but are now imported from other countries.

- 5.1.4. High volume/low quality intensive business models are increasingly seen as uneconomic as well as destructive of farming communities.
- 6. The proposed mine extension would damage a wetland.
  - 6.1. A mere 10% (approximately) of pre-colonial wetlands remain.
  - 6.2. Wetlands are a vital part of a healthy earth, environment and ecosystem.
  - 6.3. Wetlands act as the kidneys of the planet, purifying water.
  - 6.4. Wetlands safeguard areas in times of both flood and drought, absorbing excess water and then releasing it when it is needed.
  - 6.5. Wetlands sequester carbon from the atmosphere.
- 7. The extension of the mine threatens the habitat of the critically endangered Canterbury mudfish.
  - 7.1. A UN report on global biodiversity states that as many as one million species are now at risk of extinction due to habitat loss and climate change. Expanding a coal mine contributes to both.
  - 7.2. The Canterbury mudfish is considered a taonga by Ngai Tahu.

Bad habits are hard to break. A person will never be able to "quit smoking" if he continues to put cigarettes in his mouth. Coal has become a bad habit, and we will not break ourselves of it if we continue to expand and open coal mines.

Coal's social license is about to expire. International investments in coal-fired power are falling, and research has shown that 40% of the world's coal power stations are already running at a loss. Coal is regarded as a cheap fuel source, but that's because the Government does not make coal companies pay the real cost of their activities, including the cost of the carbon pollution and local water and air pollution caused by mining, transporting and burning coal - and the cost of remedying the health effects of that pollution.

The applications by Bathurst Coal Ltd to continue operating and expand an open cast coal mine (known as Canterbury Coal Mine), including retrospective and future operation, at Bush Gully Road, Malvern Hills, in the Selwyn District are incomplete, unclear, internally inconsistent, and grossly inadequate. Multiple adverse environmental effects are more than minor, with many others potentially more than minor. The claimed economic benefits of the mine do not stack up.

This project should not proceed, and I urge this hearing to reject these applications.

Sincerely  
Zella Downing