



# **Canterbury Coal Mine Expansion Submission**

**Generation Zero**

**May 2020**

**Contact Person**

Chris Stinson

**We at Generation Zero cannot support Bathurst Coal Limited's applications for resource consents 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. Hence, we oppose applications CRC184166, CRC200500, CRC201367, CRC201368, RC185622 and aspects of CRC203016. We however support application CRC201366 and the aspects of CRC203016 related to mitigating the impacts of currently consented activities.**

**We wish to have the opportunity to be heard in support of our submission.**

Climate change is the challenge of our generation. For that reason – Generation Zero, a youth-led organisation, was founded with the central purpose of providing solutions for New Zealand to cut carbon pollution through smarter transport, liveable cities & independence from fossil fuels. We are witnessing a global shift away from polluting fossil fuels, and as New Zealanders, we are fortunate enough to possess an abundance of opportunities to make this transition.

## **1. Coal Use is Incompatible With a Safe Climate**

To avoid the worst consequences of climate change, global warming must remain below 1.5 degrees Celsius. In order to achieve that, the exploitation of fossil fuels must stop. Coal is a particularly polluting fossil fuel; coal fired plants achieve at best an energy efficiency of only around 45% and produce harmful pollutants such as sulfur dioxide, fine dust, mercury, nitrogen oxides, and arsenic.

Whether we achieve the 1.5 degree target depends largely on how quickly we get out of coal burning. It has long been clear that it is no longer a question of whether but only when.

Furthermore, the coal from CCM is primarily destined for use producing milk powder. Thus supporting a model of high volume-low value dairy farming that causes additional harms both to the climate and to the local environment.

We recognise that the Resource Management Act gives commissioners very limited abilities to consider the impact of climate change when considering consents. However as young New Zealanders Generation Zero believes that expansion of coal mining in New Zealand is incompatible with the act's stated purpose of "sustaining the potential of natural and physical resources to meet the foreseeable needs of future generations".

## **2. Long Term Feasibility Concerns**

The consents sought by BCL cover a period of 20-35 years, however relevant legislation looks likely to change in the very near future. The environment select committee have recently recommended that climate change be given greater consideration in granting resource consents - to come into effect at the end of 2021. This, and other legislative changes pertinent to coal mining, are likely to result in the near future due to the new responsibilities placed on government by the Zero Carbon Bill.

Additionally Fonterra - the majority end user of coal from CCM - have committed to phasing out the use of coal for milk production and achieving carbon neutrality by 2050 (within the period covered by one of these consents). This strategy includes a freeze on any new capacity to burn coal. Fonterra has put a stop to installing any new coal boilers. Internationally boilers running on electricity or burning biomass are common in the industry.

This raises questions about the long term demand for the coal produced at CCM.

This changing legislative and economic landscape should be contrasted with the known long term environmental harms associated with coal mining. We therefore contend that it would be unreasonable to grant consents covering the time frames sought.

### **3. Discharge From the Mine Flows into an Ecologically Sensitive Area**

CCM lies within the Selwyn catchment area, meaning that the receiving environment for discharge into water includes Te Waihora / Lake Ellesmere. The lake has been identified as having high cultural and social value but currently struggles with high pollution levels. More generally large quantities of resources have been committed by ECan and Selwyn district council to rehabilitating the health of the catchment. The granting of these consents - particularly CRC201368 for the discharge of contaminated water - would undermine those efforts to preserve Canterbury's water resources for all users.

### **4. Bathurst Coal Limited Have a History of Failing to Comply With Consents**

BCL has faced numerous fines for infractions of consents to discharge mining effluent - most recently in November 2019. Furthermore we note that the sought consents include a application for retroactive consents for activities dating back as far as 2012. We question the prudence of rewarding these serial breaches with additional permissions, and argue that BLC should be required to demonstrate its willingness and capacity to comply with existing consents before any further ones are granted.

### **5. Mitigation of Existing Impacts Should be Allowed and Required**

Generation Zero supports any actions taken to manage the impact of existing mining operations on the local environment. We therefore support application CRC201366 to take surface water for the purposes of dust suppression and the aspects of CRC203016 that relate to treating contaminated water (discharge of lime products and mussel shells). We believe that continuing and expanding these activities should be a requirement for all preexisting mining operations going forward.

**From:** [Generation Zero](#)  
**To:** [Hearings](#)  
**Subject:** You received a submission for Bathurst Mine Resource Consent  
**Date:** Sunday, 17 May 2020 9:13:58 PM

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### Form Summary

<b>Name</b>	Troy Gallagher
<b>Email</b>	
<b>Multiple choice</b>	I oppose allowing further earthworks and discharges of contaminants into water and air as part of the expansion of the Canterbury Coal Mine., I oppose Bathurst Mining Limited being granted retroactive consent for uncontested earthworks within Canterbury Coal Mine., I support actions that may be required to mitigate the impacts of the existing harms caused by the mine.
<b>Why do you oppose the mine?</b>	

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unknown

Entry ID: 26

Referrer: <http://m.facebook.com>

Form Host: [https://www.generationzero.org/oppose\\_the\\_bathurst\\_mine](https://www.generationzero.org/oppose_the_bathurst_mine)

**From:** [Generation Zero](#)  
**To:** [Hearings](#)  
**Subject:** You received a submission for Bathurst Mine Resource Consent  
**Date:** Wednesday, 20 May 2020 4:47:58 PM

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### Form Summary

Name

Email

Multiple choice

I oppose allowing further earthworks and discharges of contaminants into water and air as part of the expansion of the Canterbury Coal Mine., I oppose Bathurst Mining Limited being granted retroactive consent for uncontested earthworks within Canterbury Coal Mine., I support actions that may be required to mitigate the impacts of the existing harms caused by the mine.

Why do you oppose the mine?

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