

From: [Peter Moller](#)
To: [Hearings](#)
Subject: HPE CM: Bathurst Coal application
Date: Tuesday, 12 May 2020 4:13:49 PM
Attachments: [Submission on Canterbury Coal Mine Expansion.docx](#)

Dear Sir/Madam,

re Canterbury Coal Mine application by Bathurst Coal

I should like to submit the attached document for your consideration.

Yours faithfully,

P W Moller

Preamble.

The Press reported 9 May that Bathurst Coal has applied to expand its coal mining operations in the Malvern Hills. It currently mines 95,000 tonnes per annum of which 90% is supplied to Fonterra at Darfield and Clandeboye and to Synlait at Dunsandel. The C.E.O. stated this represented 60 trucks per week which could increase to 90. This would run counter to New Zealand's commitment to international agreements on Climate Change.

The legal position.

In 1992 New Zealand became a party to the U.N. Convention on Climate Change. The Paris agreement was ratified in 2016. Under this we have committed to reducing greenhouse gas emissions by 30% below 2005 levels by 2030. Article 4 states that parties should aim to reach global peaking on greenhouse gas emissions as soon as possible. Article 10 states that parties should show a long-term vision on the importance of fully realising technology development and transfer in order to improve resilience to climate change and reduce greenhouse gas emissions. Article 11 refers to capacity building... to enhance the capacity and ability.... to implement adaptation and mitigation actions.

New Zealand responses.

The Ministry for the Environment points out that "we all have a role to play." The government responded to the New Zealand Productivity Commission's Low Emissions Economy Report that we should avoid locking in emissions by supporting smart lower emissions choices.

The greenhouse gas inventory 1990-2018 shows that gross emissions in 2018 were 24% greater than in 1990. Because of the increased volume of timber harvested the net emissions were 57% greater.

Although the greatest contributors to the increase in emissions are dairy cattle methane and road transport, it is clearly important to reduce the production of greenhouse gases wherever possible. It is to be noted that the Fonterra Co-operative Group are praised by the Ministry for the Environment for their trial at the Brightwater site to reduce the use of coal by co-burning woodchip. Such an initiative supports our national commitment and is in line with the Paris agreement's advice to plan for adaptation.

The Bathurst Resources application.

Approval of this application would run counter to the obligations of our government to a United Nations agreement. By supporting a potential increase in production it would "lock-in emissions" for the future and be a disincentive to the involved parties to adapt to the compelling needs in relation to Climate Change.