

From:
To: [Hearings](#)
Cc: [Edwina White](#)
Subject: Notifications Consent Submission: Group 542
Date: Monday, 18 May 2020 11:28:55 AM

Group ID: 542

Consent name: Bathurst Coal Limited

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

Name: Aoraki Province of the Green Party of Aotearoa New Zealand

Care of: Jacinta O'Reilly

Mailing address 1:

Mailing address 2:

Suburb:

Town/City:

Post-code:

Country:

Mobile phone:

Work phone:

Home phone:

Email:

Contact by email: No

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

Reasons comment:

This is a very substantial proposal and there are substantial reasons for our opposition to

all of it. We oppose the granting of this consent as expansion of the mine goes against our core principle of ecological wisdom. The Economics of Coal Mining: The future for fossil fuels, especially coal, is negative. Many fund managers and companies are divesting from stocks in coal and banks are starting to. Bathurst Coal Ltd is unable to internalise the true costs of its operations and is producing negative externalities to society as a whole, by means of pollution of air, water and global atmospheric conditions through greenhouse gas emissions. These are a cost to the people of this planet. Solid Energy sold its mines to Bathurst Coal when the coal price went down a lot, now Bathurst can only prop up its West Coast mines, which produce coking coal for export, by the continued sale of non-coking coal [such as at Coalgate] to local users who could and should transition to biofuels or electricity. If this application is declined it will encourage organisations like Fonterra to consider new cleaner methods of dehydrating milk, to the benefit of organisations producing clean energy, workers in these industries, and the planet. Zero Carbon Emission targets: The Zero Carbon Act which has been passed already, allows decision-makers to take into account statutory emission targets under the Paris agreement. It is not tenable that permissions continue to be granted for operations that are clearly counter to The Zero Carbon Act expectations. Such operations consume the emissions budget of the nation for little gain. Breaching of Consents by Bathurst Coal: The Coal Company has consent for production of 20.000 tonnes of coal annually granted by Selwyn District Council. Yet currently it produces 125.000 tonnes, grossly exceeding this consent. It has been found guilty by a Crown Commissioner of discharging mining effluent containing heavy metals and acid mine drainage into local waterways. Ecan's own website documents fines for 27 similar infringements of consent conditions. Asking for retrospective permission to carry on at this scale of operations and with no apparent ability to meet operational conditions like waste discharge, make this application totally untenable and it should be declined. Effects on Environment and Wildlife: The purpose of the RMA is to test the suitability of a commercial development against its effects on the receiving environment. The effects in this case have not been adequately assessed by the applicant and have been deleterious in the past on land where the mine has illegally expanded already. There is no reason to assume this situation will get any better in the future. The extension being applied for will entail the destruction of a wetland and continued discharge of waste water into the habitat of the critically threatened Canterbury Mudfish. The catchment of the Selwyn river in the foothills area is one of the strongholds of this endemic species. Any effect on native wetland birds and other wildlife is not clear. Wetland clearance has been almost ubiquitous in Canterbury over the years and should now be stopped and ameliorated in future. Water quality will also be comprised by this application.

Consent comment:

The whole of the application should be declined and remediation of land already damaged should be required. Any level of consent granted, which we would be disappointed to see, should entail adequate safeguards such as actual monetary bonds to ensure the company has the resources to remediate damage in the event of a company collapse, an eventuality more likely now as the effects of COVID 19 become apparent.