

Greenpeace NZ submission on Bathurst Coal Limited consent applications.

Regarding consent applications: CRC184166 - CRC200500 - CRC201366 - CRC201367 – CRC201368 – CRC203016 – and RC185622.

Introduction

1. This is a submission by [Greenpeace of New Zealand, Inc.](#) (Greenpeace) on the applications to ECan and the Selwyn District Council by Bathurst Coal Limited.
2. The Greenpeace address for service is _____, Attention
Genevieve Toop: email: _____ Telephone: _____
3. We consent to distribution of this submission. We do not wish to be heard.
4. Greenpeace is a global independent campaigning organisation that acts to protect and conserve the environment and to promote peace. Greenpeace International operates 26 independent national and regional offices across the world covering operations in more than 55 countries across Europe, the Americas, Africa, Asia and the Pacific.
Greenpeace is the New Zealand office of Greenpeace International. The international organisation has a global membership of around 3 million supporters. Greenpeace New Zealand was founded in 1974 and has over 175,000 active supporters.
5. Greenpeace NZ opposes **all** consents sought by Bathurst Coal Limited.
6. There is stark and incontrovertible evidence that open-cast coal mining and burning degrades human and environmental health and worsens the climate crisis.
7. Based on this substantive evidence, Greenpeace NZ believes that approving the expansion of an open-cast coal mine would be both an environmentally destructive and morally unconscionable decision by local Government.

Reasons for opposition in more detail.

8. The significantly negative impacts to biodiversity, landscape, water quality and human health as a result of open cast coal mining are well documented and summarised by the Parliamentary Commissioner for the Environment in its 2010 report.¹
9. **The Climate Crisis** - Coal is a major contributor of global greenhouse gas emissions.²
10. **Indirect environmental impacts** - The coal mined here will be used in local dairy factories for drying milk powder. In this way, the mine supports environmental degradation from intensive dairying across the Canterbury plains. This environmental

¹ Parliamentary Commissioner for the Environment, 2010. Making difficult decisions: Mining the conservation estate. [Link](#).

² Intergovernmental Panel on Climate Change, 2018. Mitigation Pathways Compatible with 1.5°C in the Context of Sustainable Development. In: Global Warming of 1.5°C. An IPCC Special Report on the impacts of global warming of 1.5°C.

degradation is well documented and also summarised by the Parliamentary Commissioner for the Environment³ and the Ministry for the Environment.⁴

11. **The critically endangered Canterbury mudfish** – This mining operation is very specifically a threat to the endangered Canterbury mudfish, whose habitat is now very restricted⁵. The continual flouting of notices against discharging mining effluent into the mudfish habitat (as below) shows that this operator cannot be trusted to protect the environment they are working in and must not be allowed to continue their destruction. Aotearoa's native animal and plant species are disappearing rapidly⁶ under what has been termed 'death by a thousand small cuts'. Every expansion of human activity into a wild/unused area means less space for other species.
12. Bathurst has a history of refusing to comply with resource consents. ECan's own website documents⁷ fines for 27 infractions against discharging mining effluent into the local waterways, the last such being November 2019⁸. Selwyn DC has also served abatement notices⁹ against the company for consent infringements. We have no confidence that a company that yearly gets fined for consent breaches has any intention of respecting any future consent requirements.

ENDS

³ Parliamentary Commissioner for the Environment 2013: Water quality in New Zealand: Land use and nutrient pollution.

⁴ Ministry for the Environment and Stats NZ, 2018. Our Land 2018 Environmental Reporting Series. ([link](#)) and Ministry for the Environment, 2020 New Zealand's Greenhouse Gas Inventory 1990-2018 ([link](#))

⁵ <https://www.doc.govt.nz/nature/native-animals/freshwater-fish/mudfish/>

⁶ Ministry for the Environment and Stats NZ, 2018. Our Land 2018 Environmental Reporting Series. ([link](#))

⁷ <https://www.ecan.govt.nz/get-involved/news-and-events/2017/coal-mine-fined-for-consent-breaches/>

⁸ <https://www.ecan.govt.nz/get-involved/news-and-events/2018/more-fines-for-coal-mine/>

⁹ <https://www.stuff.co.nz/business/100656545/bathursts-coalgate-mine-avoids-abatement-notice--for-now>