

From:
To: [Hearings](#)
Subject: Submission against Bathurst Coal Limited - resource consents RC185622, CRC184166, CRC200500, CRC201366, CRC201367, CRC201368, CRC203016
Date: Friday, 22 May 2020 11:43:00 AM

Dear ECan and Selwyn District Council,

First of all, I would like to apologise for the delay with which I am making this submission, as it relates to the Bathurst Coal Limited application for resources consents to the Canterbury Regional Council (CRC184166, CRC200500, CRC201366, CRC201367, CRC201368, CRC203016) and the Selwyn District Council (RC185622). I understand that the deadline for submissions recently closed; however, in my defence, I only became aware of the Bathurst Coal Limited application yesterday, 21/05/2020. I'm not sure how the council expects residents to be aware of applications and have the opportunity to provide submissions for or against them, if there is no system for residents to be made regularly aware of the opportunities. Going forward, I would recommend the council undertakes a service whereby residents are made aware of Publicly Notified Resource Consents well in advance of submission deadlines; Facebook could provide good engagement for this, or perhaps an email subscription service. If something such as this already exists, I would appreciate being made aware of it.

I am a ratepayer and resident of the Selwyn District, and would like to confirm that I am absolutely opposed to the application made by Bathurst Coal Limited, predominantly on environmental grounds.

In 2019, Bathurst Coal Limited was convicted and fined \$18,000 for an unauthorised discharge in an area home to a critically endangered native fish (the Canterbury mudfish). The fact that Bathurst sought to be discharged without conviction (source: <https://www.stuff.co.nz/environment/119004185/mining-company-bathurst-coal-fined-18k-for-discharge-in-vulnerable-environment>), in case it jeopardised its approval to purchase sensitive land by the Overseas Investment Office, speaks volumes of the company's disregard for the needs of the environment. In the Consultation Document presented by Bathurst Resources Limited/BT Mining Limited to The Treasury in April 2019, Bathurst stated, "Responsible resource use lies behind all of Bathurst's activities and its approach to sustainable development and management of its social and environmental performance. This means everything the company does is guided by a commitment to shareholders, employees, local communities, and, importantly, the environment," (source: <https://treasury.govt.nz/sites/default/files/2019-12/overseas-investment-submissions-4113897.pdf>). In fact, Bathurst was issued 27 infringement notices before its case went to court, which indicates their statement above in the Consultation Document is nothing but smoke and mirrors.

Under resource consent CRC184166, Bathurst is seeking to undertake earthworks in a high soil erosion risk area, clear away native vegetation in riparian margins, and remove important wetland habitats. Under resource consent CRC201368, Bathurst seeks to discharge sediment and mine influenced water, drainage water and residual contaminants from the treatment of water, to Tara Stream/Wetland. Under resource consent CRC203016, Bathurst seeks to discharge coal combustion residuals and lime products into the land and water nearby. Their application for such resource consents only shows that they are looking to continue and further expand their polluting practises.

It is widely known that coal is a serious, long-term contributor to global warming and, thereby, climate change. The requested term of resource consent CRC200500, under which Bathurst seeks to discharge contaminants to air (fugitive dust) from within the mine operations area, is 35 years, which puts the operations well into the 2050s. New Zealand's target under the Paris Agreement is to reduce greenhouse gas emissions by 30% below gross emissions for the period 2021-2030 (source: <https://www.mfe.govt.nz/climate-change/climate-change-and-government/emissions-reduction-targets/about-our-emissions>). However, government emissions projections last year showed the country falling woefully short of its Paris commitment, with just a 9%

reduction in gross emissions expected by 2030 on 2005 levels

(source: https://www.nzherald.co.nz/nz/news/article.cfm?c_id=1&objectid=12326964). Granting permission to Bathurst Coal Limited to continue and expand its operations beyond 2022 would negatively impact on New Zealand's environmental goals, and make it even more difficult to transition away from non-renewable resources.

As local governing bodies, I consider it to be your responsibility to discourage local businesses from expanding operations that contribute towards polluting practises, and instead stimulate innovation and encourage shifting towards sustainable practises. The local employment provided by businesses such as Bathurst could be maintained, and even increased, during a transition to sustainable business models. In 2019 Bathurst actually reported a net after-tax profit of \$45 million, up on \$5.5 million on the previous year (source: <https://www.odt.co.nz/business/coal-business-humming>). This money could be put towards reconstruction of existing sites (to reduce coal-mining and introduce alternative business options) and retraining of existing staff. There is a greater demand in New Zealand for renewable energy sources, so any company that says it is not a viable business opportunity is just not willing to make the effort, and its 'good character' should be called into question.

Councillors, I strongly urge you to consider the impact your decision will have for the future of our local, national and global environment, and the message it would send to similar businesses who may also seek additional resources for similar purposes. In this time of global crisis, it can seem easier to make decisions based on the here and now, but for every action there is a price. Please do not sacrifice our environment for the empty promises of a company that profits from pollution.

Yours sincerely,

Maryana Hamilton