

From:
To: [Hearings](#)
Cc: [Edwina White](#)
Subject: Notifications Consent Submission: Group 542
Date: Monday, 18 May 2020 2:57:27 PM
Attachments: [ECan-Submission.docx](#)

Group ID: 542

Consent name: Bathurst Coal Limited

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

Name: Angus Hellen

Care of: Katie Watt

Mailing address 1:

Mailing address 2:

Suburb:

Town/City:

Post-code:

Country:

Mobile phone:

Work phone:

Home phone:

Email:

Contact by email: Yes

Is a trade competitor: No

Directly affected: No

Consent support/hearing details

- CRC184166: oppose | WANT to be heard | will NOT consider joint hearing
- CRC200500: oppose | WANT to be heard | will NOT consider joint hearing
- CRC201366: oppose | WANT to be heard | will NOT consider joint hearing
- CRC201367: oppose | WANT to be heard | will NOT consider joint hearing
- CRC201368: oppose | WANT to be heard | will NOT consider joint hearing
- CRC203016: oppose | WANT to be heard | will NOT consider joint hearing
- RC185622: oppose | WANT to be heard | will NOT consider joint hearing

Reasons comment:

(nothing entered)

Consent comment:

To deny consent to all parts of the application by Bathurst Coal Ltd. on the basis that we are currently facing a climate crisis, and furthering any mining operations, let alone expanding, would be a huge setback on the path to a better future. Also there is the fact that ECan has recognized the current climate and ecological crisis, declared a climate emergency and agreed to act on it in all its activities. To now allow the expansion of coal mining for another 20-30 years makes mockery of the intent of such a declaration.

I am in strong opposition to Bathurst Coal Ltd.'s application on the grounds that we are currently facing a global climate crisis; I believe that providing consent to any further mining operations would be completely irresponsible to future generations. Not only for those to come in Aotearoa, but around the entire world; will the effects of these operations be felt.

I oppose each application for resource consent, as well as the overall expansion of the mine, because:

1. Coal kills the climate

Coal is a major contributor to carbon emissions worldwide, and thus to the current climate and ecological crisis humanity is facing. Also, In 2019 ECan recognised the current climate and ecological crisis, declared a climate emergency and agreed to act on it in all its activities. To now allow the expansion of coal mining in your rohe (region/territory) for another 20-30 years makes mockery of the intent of such a declaration.

I personally feel distressed that there is a possibility that consent could be granted, allowing expansion of the mining of coal in our local area; I think it sends a message to other possible carbon emitters that there will still be support from local government to continue their practices. Right now we need to see the tide turning in favour of renewable, not more coal.

2. Canterbury Coal Mine produces low-grade coal used locally for heating

This is low-grade sub-bituminous coal sold primarily to local dairy factories, schools and other organisations for heating. In a climate crisis, alternatives to coal for heating can and must be found. There is no justification for mining this coal and the mining should be phased out, not extended.

3. The mine supports unsustainable farming practices on the Canterbury plains

90% of the coal is used by Fonterra factories at Darfield and Clandeboyas, and Synlait at Dunsandel for drying milk powder. There is growing substantial evidence that such dairy farming practices which provide the milk to these factories -

- Due to overstocking, intensive irrigation and high nitrogenous fertiliser use, have been and continue to be destructive to both water supply and water quality in Canterbury.
- Are unsustainable and incompatible with the health of our land (monoculture, loss of biodiversity), people (nitrates in the groundwater), and animals (lack of shelterbelts and intensive farming practices).
- Are a threat to New Zealand's food security - this area is naturally better suited to wheat and grain growing – these were once grown there but now have to be imported.
- Follow a high volume/low quality intensive business model that is increasingly uneconomic as well as destructive of farming communities.

Even though these are not practices directly carried out by Bathurst Coal Ltd; the fact that they are providing a source of cheap and easily accessible low-grade coal for local dairy factories means they will have no desire to look elsewhere. By denying consent to Bathurst Coal Ltd. You could force these factories to look for such alternatives.

Bathurst's history of refusing to comply with resource consents

Bathurst Coal Ltd. has a long history of discharge consent infraction. ECan's own website documents fines for 27 infractions against discharging mining effluent into the local waterways, the last such being November 2019. Selwyn DC has also served abatement notices against the company for consent infringements. I am highly distressed by the possibility that a company that yearly gets fined for consent breaches has any possibility of gaining further consent; I also have no confidence that Bathurst Coal Ltd. Would respect any future consent requirements.

Threat to the critically endangered Canterbury mudfish

Aotearoa's native animal and plant species are disappearing rapidly 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. This has been shown recently and vividly by the tiny respite that Nature enjoyed during the COVID-19 lockdown. This mining operation is very specifically a threat to the endangered Canterbury mudfish, whose habitat is now very restricted. The Canterbury mudfish is present at the lower end of the Tara Stream catchment; the upper end of which is likely impacted by AMD. It only makes sense that traces of the AMD are making their way down to the habitat of the mudfish.

The continual flouting of notices against discharging mining effluent into the mudfish habitat shows that this operator cannot be trusted to protect the environment they are working in and must not be allowed to continue their destruction.

Minimisation of the negative impact on local environment and community

There are four major hydrological sub catchments which are affected by the mine; Bush Gully stream (north of the mine), Tara and Oyster Gully streams (south) and Surveyors Gully (west). Baseline aquatic ecology data from Tara Stream, Bush Stream, Surveyors and Oyster Gullies show overall quality of the habitat and aquatic communities are poor; no doubt previous mining activities have contributed to this state.

The applications describe the following activities:

- Acid Mine Drainage (AMD) seepage from the work area
- Stormwater runoff during rainfall events that includes AMD
- Sediment laden discharges from earthworks activities
- Discharge of contaminants to water for treating AMD
- Disposal of coal ash
- Earthworks for coal mining

As part of this, the new application seeks to increase the amount of Coal Boiler Ash (CBA) discharged to land from 2,500 tonnes to 30,000 tonnes. This is an astounding increase in materials, and even if it doesn't come close to this amount, any increase in these materials being dumped, rather than the necessary reductions we need to see, would be absolutely devastating.

There is also the issue of the proposed removal of 540 m² of wetland vegetation from Tara stream; even though there is a proposed mitigation response of 2,900 m² of wetland re-vegetation in other areas, it would take a long time for these areas to become effective. The downstream effects of removing such wetland vegetation will be devastating.

Approximately half of the mining site is located within the identified flow sensitive catchments and the high soil erosion risk area; we are already seeing unprecedented erosion throughout the world, with the removal of vegetation and increased farming practices locally, we are simply washing away all of the good soil. What will become of such areas of land in the future? And for what purpose are we allowing this destruction to occur? Short term gains are certainly going to be at the cost of long term extreme devastation and extinction.

The Bathurst Environmental Risk Summary lists following key risks to the environment:

- Acid Mine Drainage (AMD) entering waterways
- Excessive sediment entering waterways
- Pollutants from Coal Boiler Ash (CBA) entering waterways or air
- Dust
- Oil spills

These are all going to negatively affect the entirety of the surrounding environment. For those who live in the area, all of these contaminants being released into the air will be affecting their health, as well as polluting their land. On top of that you have the complete obliteration of the natural beauty of the landscape continuing to seep out into visibility; just laying eyes on a mine makes you feel sick inside, as you can understand on a deep level what a crime against our home, our whenua this is. Tearing open the land to extract minerals for short term profits in the hands of big corporations.

For all of the reasons I have stated, I cry out to you to please, please, not grant consent to Bathurst Coal Ltd.

Nga Mihi,

Angus Hellen