



ENVIRONMENT AND CONSERVATION ORGANISATIONS OF NZ INC.

Level 2, 126 Vivian St, Wellington, New Zealand
PO Box 11-057, Wellington
Email: eco@eco.org.nz Website: www.eco.org.nz
Phone/Fax 64-4-385-7545

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Buller District Council
C/- West Coast Regional Council
PO Box 66
Greymouth 7840

West Coast Regional Council
PO Box 66
Greymouth 7840
info@wrc.govt.nz

Solid Energy New Zealand Ltd
PO Box 1303
Christchurch 8140
info@solidenergy.co.nz attn Ruth Bartlett

Submission on Mt William North Mining Project

Introduction

1. This submission **opposes** the whole of the application.
2. This submission is on behalf of the Environment and Conservation Organisations of NZ (ECO) which is the national alliance of 55 groups with a concern for the environment. ECO has been involved in issues of energy and land-use policy since its formation 40 years ago. This submission has been prepared by members of the ECO Executive and is in line with ECO Policy that was developed in consultation with ECO member bodies and endorsed by our AGM.
3. This proposal is contrary to the provisions of sustainable management under Part II of the Resource Management Act.
4. The extraction of coal and the use of coal is a major source of greenhouse gases and a cause of ocean acidification.
5. Continuing emissions of greenhouse gases will add the climate destabilisation, global warming and ocean acidification which is contrary to sustainable management of our natural and physical resources.

6. New Zealand should be committed to preventing dangerous, human induced climate change and the impacts of ocean acidification consistent with the commitments we have already made under Article 2 of the United Nations Framework on Climate Change (UNFCCC).
7. The benefit estimates are overstated because they omit any accounting for environmental damage costs, so overstating the net benefit and understating any net loss to the country from exploration and mining;

Summary of Additional Points

8. Coal, even coking coal, is a major source of carbon, and New Zealand is officially trying to prevent this being released into the atmosphere. When coal comes from an ecologically sensitive area, then the environmental cost of the coal is very high compared to its monetary value.
9. No 'net loss or gain' for biodiversity values seems a poor objective. ECO NZ does not support this position, and seeks an improvement in the outcomes. On the current path to remain the same, the populations are threatened and this will lead to extinctions. "No net loss" should apply to individuals, as no evaluation of the larger population can be done, nor can cumulative effect be accounted for. Each individual animal is protected under the Wildlife Act.
10. Species which the proposal is likely to kill or displace are protected under the Wildlife Act and this should be of paramount concern. "Moving on" native reptiles discovered during searches for land snail; or displacing birds (unmonitored - as they fly away) should not be part of the permitted activity. The applicant needs to provide a comprehensive ecological study of the Two Stream area to show that the area is a) suitable, and b) that competition for resources is not a problem. The applicant then needs to commit to ongoing surveys and protection against pests. The resource consent should require this and set the benchmark for the Department and the Councils. There need to be stricter requirements on the relocation of animals into habitat the same as the original. Clause 1(i) of the Fourth Schedule of the RMA states that; "Where the scale or significance of the activity's effect are such that monitoring is required, a description of how, once the proposal is approved, effects will be monitored and by whom" (RMA 1991).
11. The fact that introduced mammals are rare in the Mt William area is a good thing – in that the native animals are apparently not as threatened here. The greatest threat is ever-increasing disturbance from more mining operations.
12. *"The two species of lizard found during the current survey (West Coast green gecko and forest gecko) are also known to be present at low densities in the wider area of the Stockton-Denniston Plateaux" .. and .. "The incidental capture and translocation of any lizards encountered, either during snail searches or as part of other activities, is proposed to mitigate any adverse effects on local lizard populations. Lizards will recolonise suitable habitat in disturbed environments, as indicated by the presence of West Coast green gecko found in short regenerating vegetation at Marshall Mine in the upper Waimangaroa Valley"* This is a minimalistic and unsatisfactory approach and the AEE is clearly ecologically deficient.
13. The ecological report points out that a single survey is not sufficient to quantify or model populations, especially when many organisms are small and cryptic. We request that further research is carried out if the consent is given, as insufficient information is available to protect individual animals under the Wildlife Act, not to protect an ecosystem.

14. We wish the consent authorities of West Coast Regional Council and Buller District Council to make the following decision: **decline the application in its entirety**

15. ECO wishes to be heard in support of our submission.

16. Furthermore, to reduce cost, carbon use, and inconvenience to all parties, we ask that:

- (i) we can present our evidence by teleconference or skype; and
- (ii) the District and Regional Council consent hearings be heard together.

Yours sincerely

Barry Weeber,
Co-Chairperson.