

Submission Form

Marine Consents and Marine Discharge Consents Application

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Submitter Name:
Cheung
Catherine

Hard Copy Form
Incomplete Submission

Marine Consents and Marine Discharge Consents Application

Application Name: Trans-Tasman Resources Limited iron sand extraction and processing application
EPA Reference: EEZ000011
Applicant: Trans-Tasman Resources Limited
Notification Date: 17 September 2016
Submissions Close: 5:00pm, Friday 14 October 2016

3. Electronic correspondence

You will receive information by email. If you are unable to receive emails, please indicate below:

I cannot receive electronic copies of information and updates

4. Do you wish to speak to your submission at the hearing?*

I / We **do not wish** to speak about my / our submission at the hearing.

OR

I / We **wish** to speak about my / our submission at the hearing.

If you **wish to speak** at the hearing, tick as many as apply to you:

If others make a similar submission, I / we will consider presenting a joint case with them at the hearing.

I / we wish to present in Te Reo Māori.

I / we wish to present in New Zealand Sign Language.

I / we intend on having legal representation (i.e. a lawyer speaking on your behalf).

I / we intend to have expert witnesses to support my / our submission.

5. What decision do you want the EPA to make and why?*

If you require more space, please attach additional pages. Please include your name, page numbers and *Trans-Tasman Resources Limited iron sand extraction and processing application* on the additional pages.

- Grant
- Grant with conditions
- Neutral
- Decline

My reasons for seeking this decision are:

Seabed mining is an extractive industry that kills marine life, threatens marine ecosystems and the basis of food chains on which our fisheries depend. Unlike fisheries, agriculture or tourism, mineral mining cannot possibly be sustainably managed. This is why the EEZ-CS Act (and the RMA) exclude minerals from its purpose (section 10). This is just one of many ways the New Zealand government has taken to enable destructive industries to take hold and expand across NZ (e.g. oil and gas in Taranaki), causing environmental and social harm wherever they go. Being a marine ecologist by training, I am acutely aware of the transboundary effects of human activities, especially in the coastal and marine environments. It is simply not possible to confine the negative impacts of mining within the boundary of the mine, with ocean currents and dynamic weather conditions, not to mention the species themselves which traverse across the depths and widths of the ocean and coastal habitats, at different stages of their life cycles, and at different times of the year. This transboundary nature of the marine environment is one reason why well-managed, no-take marine reserves benefit nearby fisheries, while marine parks that are not well designed or managed are continuously being encroached and impacted by polluting or extractive activities outside the parks. The current way that EPA has taken to assess effects from a proposed activity in isolation, such as with the Shell Todd Oil Services Maui and OMV Maari marine consent applications, and the present TTRL seabed mining application, is totally flawed. None of the assessment of these applications has properly assessed the cumulative effects of these activities on the marine environment, notably on threatened and endangered marine mammals. The reality is that these species are exposed to a multitude of impacts from everything that has and are occurring in and around the areas they inhabit, not just the impacts from the proposed activity. Even though the effects from a single proposed activity may be minor, the addition of that activity to the suite of existing, concurrent and envisaged activities and their impacts on an endangered species could be devastating ? extinction! The definition and requirement to assess ?Cumulative effects? are clearly stated under the EEZ-CS Act (sections 6, 28, 33, 39 and 59). It is absolutely critical that EPA and the Decision making committee to respect and implement the Act as it is, rather than ignoring key aspects of it. NZ has the international obligation to protect and enhance the recovery of threatened species under the UN Convention of Biological Diversity. Its international reputation will be tarnished if it allows such a flagship species like the Maui?s Dolphin to go extinct under our watch! It is utterly irresponsible, short-sighted and hypocritical for the government to keep paying lip service to biodiversity conservation and climate change on one hand while dishing out more and more permits for mineral and petroleum prospecting, exploration and mining, changing the law to make it easier for industries and potentially criminalise peaceful protestors (Maritime Crimes Amendment Bill, 2016). The government is actively attracting, enabling and supporting mining industries. Tangaroa, the government?s top ocean research vessel has recently been upgraded to ?provide capability important to industry, notably in fisheries, mining and oil and gas exploration. ? NIWA is playing a pivotal role in the growth and development of New Zealand?s valuable oil and gas sector? (<https://www.niwa.co.nz/news/voyages-of-discovery>). The increasing corporatisation of public institutions such as NIWA is unacceptable and against public good. The latter is clearly demonstrable through the redaction of hundreds of pages of key documents in the TTRL application, and the DMC?s judgement that avoiding disclosing a ?trade secret? and causing ?unreasonable prejudice? to TTRL?s commercial position outweigh the public interest in making the information available. I support the submissions by Kiwis Against Seabed Mining (KASM), Climate Justice Taranaki and all iwi who are opposed to TTRL?s application. I strongly urge that this application be DECLINED in full.

by what is proposed in this application?

Lawfully established existing activity, whether or not authorised by or under any Act or Regulations, including rights of access, navigation and fishing

Any activity that may be undertaken under the authority of an existing marine consent

Any activity that may be undertaken under the authority of an existing resource consent granted under the Resource Management Act 1991

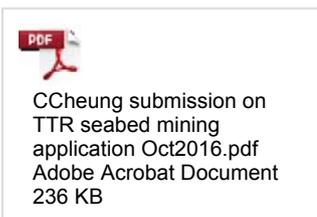
Settlement of a historical claim under the Treaty of Waitangi Act 1975

Settlement of a contemporary claim under the Treaty of Waitangi as provided for in an Act, including the Treaty of Waitangi (Fisheries Claims) Settlement Act 1992

Protected customary right or customary marine title as recognised under the Marine and Coastal Area (Takutai Moana) Act 2011

What is your existing interest and how may it be affected by this application?

If you would like to attach any supporting documents please do so below.



Only ONE PDF or Word document with a maximum size limit of 15MB can be attached to this submission form. Please forward larger files or file types other than PDF or Word, or multiple documents directly to the EPA on a CD or DVD or USB stick.

Email Address

I wish to receive a copy of my completed submission via email.

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Being a marine ecologist by training, I am acutely aware of the transboundary effects of human activities, especially in the coastal and marine environments. It is simply not possible to confine the negative impacts of mining within the boundary of the mine, with ocean currents and dynamic weather conditions, not to mention the species themselves which traverse across the depths and widths of the ocean and coastal habitats, at different stages of their life cycles, and at different times of the year. This transboundary nature of the marine environment is one reason why well-managed, no-take marine reserves benefit nearby fisheries, while marine parks that are not well designed or managed are continuously being encroached and impacted by polluting or extractive activities outside the parks.

The current way that EPA has taken to assess effects from a proposed activity in isolation, such as with the Shell Todd Oil Services Maui and OMV Maari marine consent applications, and the present TTRL seabed mining application, is totally flawed. None of the assessment of these applications has properly assessed the cumulative effects of these activities on the marine environment, notably on threatened and endangered marine mammals. The reality is that these species are exposed to a multitude of impacts from everything that has and are occurring in and around the areas they inhabit, not just the impacts from the proposed activity. Even though the effects from a single proposed activity may be minor, the addition of that activity to the suite of existing, concurrent and envisaged activities and their impacts on an endangered species could be devastating – extinction!

The definition and requirement to assess ‘Cumulative effects’ are clearly stated under the EEZ-CS Act (sections 6, 28, 33, 39 and 59). It is absolutely critical that EPA and the Decision making committee to respect and implement the Act as it is, rather than ignoring key aspects of it.

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The government is actively attracting, enabling and supporting mining industries. Tangaroa, the government’s top ocean research vessel has recently been upgraded to “*provide capability important to industry, notably in fisheries, mining and oil and gas exploration. ... NIWA is playing a pivotal role in the growth and development of New Zealand’s valuable oil and gas sector*” (<https://www.niwa.co.nz/news/voyages-of-discovery>). The increasing corporatisation of public institutions such as NIWA is unacceptable and against public good. The latter is clearly demonstrable through the redaction of hundreds of pages of key documents in the TTRL application, and the DMC’s judgement that avoiding disclosing a ‘trade secret’ and causing ‘unreasonable prejudice’ to TTRL’s commercial position outweigh the public interest in making the information available.

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