

# Submission Form

## Marine Consents and Marine Discharge Consents Application

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SUBMISSION114018  
Submitter Name:  
Boyd  
Bruce

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:

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As per attached submission.

## 6. Do you have an existing interest that may be affected 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?

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



Submission.docx  
Microsoft Word Document  
4.87 MB

**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.

Bruce Boyd

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

The Decision Making Committee  
Environmental Protection Agency.

Dear committee,

**I am opposed to the TTRL application.**

I am a member of the South Taranaki Underwater Club. I'm passionate about the unique and diverse marine communities found on the many reefs in the South Taranaki Bight (STB)

When TTRL first applied to the EPA for consent, it was obvious the true knowledge of what lies beneath the waters of the STB, was familiar only to those of us fortunate enough to be divers, as there has been extremely little scientific research conducted in the STB, with most scientific data and evidence coming from desktop studies.

As a means to address this situation the South Taranaki Underwater Club established the South Taranaki Reef Life Project. The project chose a reef located 11kms offshore from Patea at a depth of around 23 metres to conduct a study that aims to record the reef community, identify factors that shape it, and record seasonal trends. This is being achieved by utilising a dedicated team of volunteer citizen scientists working alongside marine scientists, and with the help of experts from Niwa, Te Papa and universities.

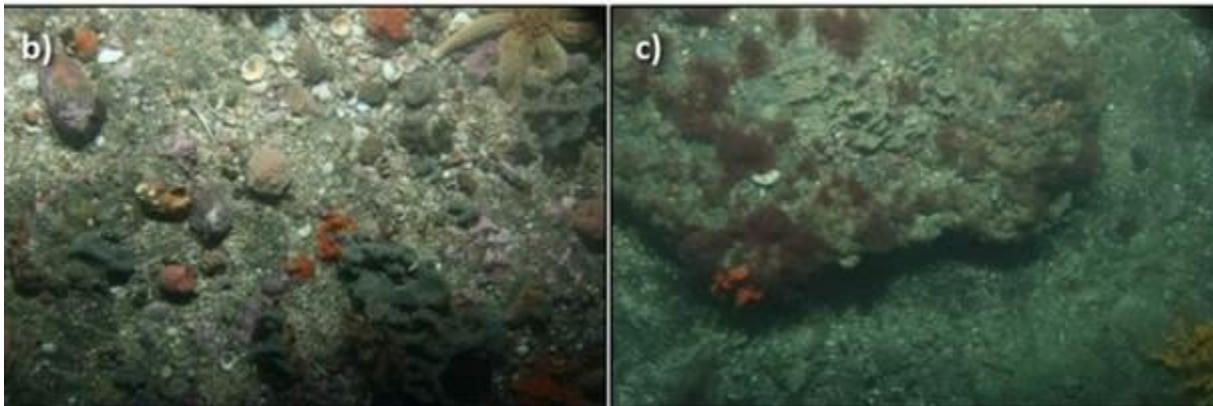
Our project partners include local schools and Iwi who assist with historical knowledge, survey work and data analysis.

The project has installed a camera on the reef to continually capture images for analysis, and input into a national database and is shared with marine scientists. The sounds heard on the reef are also being monitored by a hydrophone.

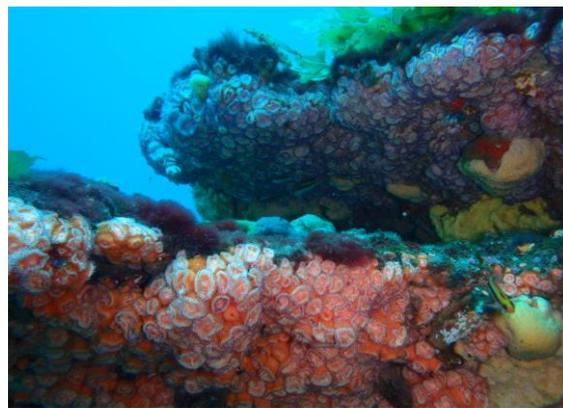
Our project team has been invited to speak to many schools and community groups in South Taranaki, and the overwhelming response is 'wow we didn't know the beauty that exists on our back door step'.

I'd like to now share with you a few images.

Firstly the only 2 images submitted by TTRL referred to as being reef.



Next are some images from our project reef.





*The South Taranaki Underwater Club is the recipient of an Environmental Award from the Taranaki Regional Council.*

*For engaging the community with science and education on protection of the marine environment through the South Taranaki Reef Life Project.*

For more images and information about South Taranaki Reef Life Project visit:

<https://www.facebook.com/southtaranakireeflifeproject/>

**Concerns I have regarding TTRLs proposal;**

**The plume generated by the mining and discharge operation.**

Even with TTRLs drastically revised modelling, a reduction of up to 40% in benthic primary production is predicted, which in turn would have a flow on

effect throughout the entire marine ecosystem of the STB, which would result in a vastly different environment to the present.

The plume as modelled, passes directly over many known reefs including our project reef and the North and South traps, which are noted as having 'outstanding value' in the Taranaki Regional Councils Coastal Plan.

I believe the extent of the plume will be far greater in these areas than TTRL are claiming as their figures are obtained by averaging out the suspended sediment over a much broader area, but these and other reefs will be affected by the densest part of the plume.

River discharges and storm events can create a disturbance to this marine environment, but nature always allows a respite in conditions and balance returns.

However TTRL propose to create a disturbance 24/7 for up to 35 years, this unnatural occurrence must have a dramatic effect on the delicate natural balance.

### **Light reduction.**

These same areas according to TTRLS data are predicted to receive up to a 50% reduction in midwater visibility.

At the traps they claim up to 26 days out of a predicted total of 125 good visibility days per year, could be lost due to their mining operations. For divers who already have limited opportunities due to the extreme weather conditions our coast endures, this is devastating.

### **TTRLS Monitoring Program.**

This proposed monitoring program is completely inadequate; TTRL has not included any group with local knowledge that has the ability to confirm the monitoring results provided by **them** to be a true and accurate account. TTRL propose the monitoring group meets annually to review the baseline monitoring results, again this is woefully inadequate, a catastrophic change could well have occurred in a 12 month period.

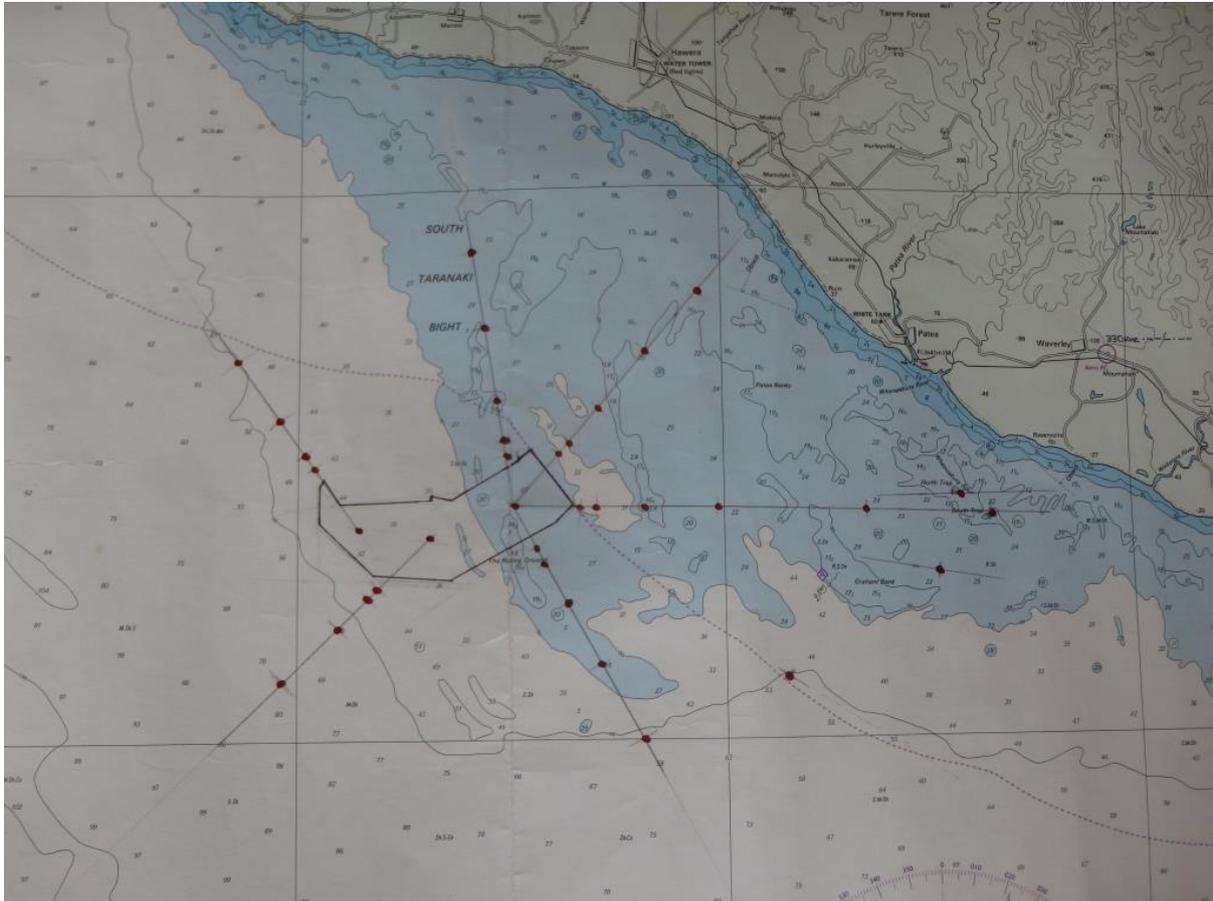
Should, TTRL be granted consent, a representative of the South Taranaki Underwater Club must be included on the Technical Review Group.

As to TTRLS claim that the level of fauna and flora being witnessed by the South Taranaki Reef Life project (as published by TTRL in local newspapers ) is not representative of the broader Patea Shoals area.

I agree this area is predominantly sand but even these sandy areas offer important habitat and sustenance to a wide range of marine life.

To suggest the reef areas are insignificant as compared to greater Patea Shoals area is ridiculous, these are extremely important areas that support a diverse range of life and are crucial to maintaining a healthy marine ecosystem.

Using data from TTRLs submission, the following map has been as accurately as possible plotted with the proposed monitoring sites, the only locations to be monitored that are reef are the well known North and South Traps, however there are reefs closer to the area the consent is sought for, that should also be included.



When the known adverse effects from this proposed operation are expected to occur where the plume is greater, the monitoring sites should be predominately located within this same area and fewer monitoring sites in the areas expected to be subject to minimal effects.

### **Economic benefits to region.**

The economic benefits to the region from this proposal are questionable, but should the waters of the STB be compromised in their ability to sustain the current level of marine diversity and abundance the income to many local businesses from the sale of boats, servicing, fuel, food etc to the many boaties, fishermen and divers would be at risk.

**It is this generation's responsibility to protect, preserve and enhance the natural state of the South Taranaki Bight for future generations, and not gamble on a massive unproven experiment which could cost us this unique treasure.**

I wish to be scheduled to speak to my submission in Taranaki.

Please advise if there will be facilities at the hearing to display photos and video.

**Bruce Boyd**