

Submission Form

Marine Consents and Marine Discharge Consents Application

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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:

See attached document

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?

See attached file

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



ST_AC.pdf
Adobe Acrobat Document
412 KB

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.



11th October 2016

Re: Trans-Tasman Resources Iron Sand Application

To whom it may concern,

I am writing to make a formal observation to the application cited above. Trans Tasman Resources Limited (TTR) wants to mine iron sand in the South Taranaki Bight for the next 35 years. It has applied for marine discharge consents to extract and process iron sand within 65.76 square kilometres (km²) of seabed. TTR proposes to extract and export up to 5 million tonnes of iron ore per year.

Having the lack of time entailed to study the relevant documentation pertaining to the above application, I would like to detail my reservations with regards to this proposal and subsequently develop the submission further which may then be delivered at the oral hearing. I am aware of other community impacts of serious concern that will be addressed by separate submissions. I wish to overview personal concerns and issues regarding to the sustainable management of tourism.

Personal Concern

I was born and raised in the scenic area of North West Coast of Ireland. The wild Atlantic shaping the rugged coastline laying out a beautiful landscape steeped in rich cultural heritage much alike to that of New Zealands West Coast. I would be very supportive of any development regarded positive for an area hence my participation in events such as the Hamilton-Waikato Tourism Opportunities Plan 2016 stakeholder review. However, in this matter I am concerned of:

- How the composition of why the West Coast of New Zealand is famous worldwide is now being proposed to be exploited, for thirty five years. The vastness of the impacts are beyond comprehension.
- The implications for the Marine Environment and Ecosystem – no research could possibly conclude the entirety of the impacts. The results and findings could certainly not portray enhancing benefits. Particular concern for endangered marine life and vulnerable species.
- Long Term Impact – This is certainly not sustainable management of our sea beds and the destruction from extracting and processing of iron sand may never be undone or remedied. The progression of such a process leads to an unknown future for the West Coast.

- Second Application – The first application was declined in 2014 for the same activity. After such a process being previously refused, a moratorium on such a project should be granted to prevent resubmission by large companies.
- Stakeholder consultation, timeframe of review and transparency of the process
- Maritime Archaeology – concern of the west coast ship wrecks and those yet to be explored.

Our family in Ireland embrace our surrounding environment, likewise to friends on the opposite side of the world in New Zealand. For pleasure, we also participate in outdoor activities, horse ride outs, hillwalks, kayaking, surfing, grow our own, bee keepers and maintain lifestyle blocks. Our family engage in the local community. Living along the border of Northern Ireland, an area were until the peace process in 1995, we still witnessed conflict. Much of which was land based issues. Today, all of these stories have become culminated to be delivered as a niche tourism sector “Dark Tourism”. This is our cultural heritage aspects which echoe traits of what occurred in New Zealand. The integrity and values of the New Zealand people is still at threat today, however it is now delivered in a different form such as this proposal. Both land and man are most likely to be critically impacted upon as a result of this proposed development.

The progression in attempts to live a sustainable way of life are evident globally. This way of life is growing in appeal to become more reconnected from life at a fast pace. The rise in concern with regards to health and wellbeing in general highlights the need for tranquil and serene environments likewise to what is on our doorstep. Invaluable resources. At present, absolutely everything we enjoy is on the verge of being devastatingly impacted.

Towards the sustainable management of tourism destinations

The shift towards the sustainable management of tourism destinations is being consolidated at an international level. This is recognised through the launch of the European Commissions, European Tourism Indicator System for sustainable management at destination level. It is also reflected internationally with the Global Sustainable Tourism Councils move towards sustainable tourism criteria for destinations. There is a drive towards the sustainable management of tourism destinations.

Context of New Zealand Tourism

The sustainable management of tourism in New Zealand is paramount considering it is chosen as a holiday destination mainly due to its scenery, unspoilt environment and rich cultural heritage. The West Coast attracts an extensive amount of activity based holidaymakers. Many people arrive as tourists, prefer rural life and some choose to live in the locality. All of which contributes significantly to the local economy.

Cultural Heritage of New Zealand

New Zealand enjoys a rich cultural heritage that is central to who they are. A location's environment is the key consideration for EU citizens when deciding on a holiday destination. Cultural heritage is the second influence (EC, 2011). Half of EU citizens would return to a tourism destination for its natural features (EC, 2012). The TTRs proposed development would most certainly impact upon the localities natural features by the 35 year term. Not only degrading the marine environment and ecosystem but also jeopardising the return of visitors. Primarily, it will harm New Zealand's reputation as "100% Pure New Zealand." Tourism New Zealand promote as "A Land and People Rich with Stories". Yet such proposals are detrimental to both the land and the people. People whom identify greatly with and have a close affiliation with the sea and marine environment. The application also fails to provide active protection of Maori interests and taonga (particularly over fisheries), but also negates kaitiakitanga (or stewardship) by tangata whenua over the environment.

New Zealand tourism structure in context of sustainable management of tourism

The facilitation and implementation for the sustainable management of tourism relies on an informed management approach from international, national, regional and local levels. International guidelines, policies, strategies and directives, some of which in turn have to be made into New Zealand law have the potential to impact and enhance the management of tourism in New Zealand from a sustainable perspective. According to the EU communication on tourism (2013), the competitiveness of the European tourism industry is closely linked to its sustainability, this is undoubtedly repetitive for New Zealand.

Marketing of Tourism

Tourism New Zealand is responsible for marketing New Zealand to the world as a tourist destination. In relation to the actual sustainable management of the tourism destination, Tourism New Zealand play a minimal role but can act as an advocate. It is worth highlighting that if the tourism product in New Zealand degraded due to a lack of sustainable management, it is Tourism New Zealand who will struggle to offer tourism products and complete the task of marketing the country on behalf of Tourism New Zealand. The West Coast of New Zealand is greatly impacted by the success of the marketing campaigns of Tourism New Zealand who have worked to evolve the "100% Pure New Zealand" marketing campaign over the past sixteen years. All an effort to make New Zealand one of the world's most well-respected tourism brands.

As a location's environment is the key consideration for citizens when deciding on a holiday destination, the marketing campaigns of both Tourism New Zealand will encounter severe difficulties in the coming years. What tourism appeal will the West Coast have when the local stakeholders and natural marine environment are not considered accordingly through a development such as TTRs.

The local areas natural environment offers the opportunity for people to escape stressful living styles, reconnect on a personal basis and enjoy a unique experience in its simplicity

through the rawness of rural New Zealand, its landscape, ecosystem and marine life. This provides tourists with real personal value and the unique experience which every tourist seeks. Even though the locality may not have the greatest of access points, the type of person who wishes to be a tourist to the area, finds their way and are sure to return. Nothing may compromise what nature and unspoilt environments have to offer the soul as identified by those from a spiritual, religious, therapeutic or counselling background.

If there was an absence of an attractive environment, there would be little tourism (Mathieson and Wall, 1982). Tourists are interested in having a holiday at an unspoilt natural area (Dolnicar and Leisch, 2008). Therefore, the destinations have an incentive to protect and enhance their environmental assets (Weaver and Lawton, 2006). The destination is the primary unit of management action (Timur, 2003; Ritchie, 2009; Bornhorst, Ritchie and Sheehan, 2010; Fyall, 2011) in tourism. The future of tourism destinations are threatened without proper management (Jamieson and Noble, 2000). This appears to be the situation at present with regards to the proposed development.

Stakeholder involvement in sustainable tourism

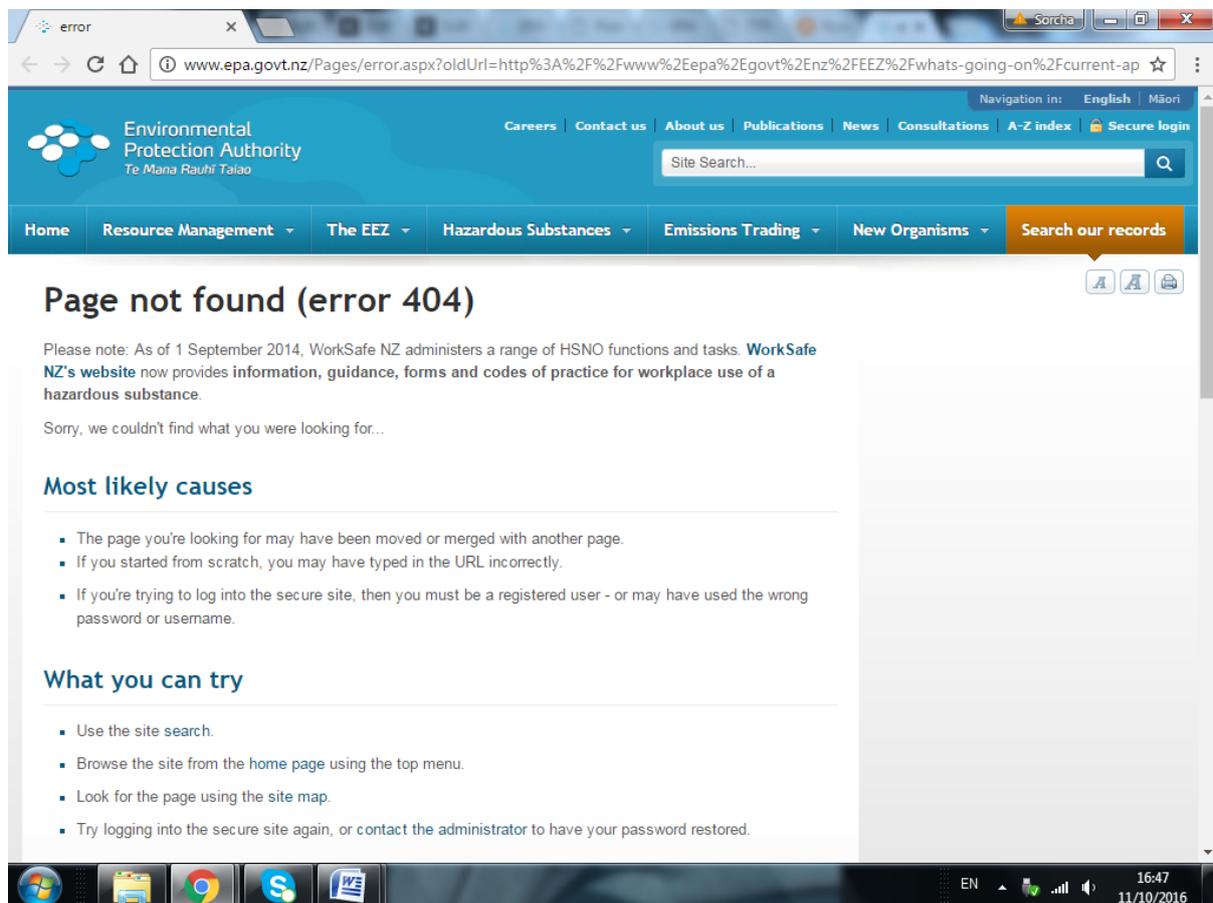
Sustainable development and sustainable tourism have evolved through the collaboration and coming together of stakeholders. The development of tourism in a sustainable manner is unattainable without stakeholder participation (Ap, 1992; Gunn, 1994; Andereck and Vogt, 2000; Gursoy, Jurovski and Uysal, 2002; Andriotis, 2005; Byrd, Cardenas and Dregalla, 2009). Stakeholder's meaningful participation is critical and a fundamental ingredient in sustainable management efforts (Sautter and Leisen, 1999). A community's practical involvement in tourism is central to the sustainability of tourism (Murphy, 1985, 1988; Olsen, 1997; Mountain Agenda, 1999; Scheyvens, 1999; Ross and Wall, 1999; Campbell, 1999, 2002; Page and Dowling, 2002; Boyd and Singh, 2003; UNWTO, 2004; Jones, 2005; Choi and Sirakaya, 2006; Viljoen, 2007; Simpson, 2008; Lee, 2012). It is imperative to recognise stakeholders when managing tourism more sustainably and to take account of their different perspectives on the related issues (Bramwell, Henry, Jackson, and Van der Straaten, 1996; Hardy and Beeton, 2001; Dodds, 2007; Waligo, Clarke and Hawkins, 2013).

Local stakeholder involvement in tourism is considered vital to have an influence to deliver the maximum benefits for the destination (Murphy, 1988; Jones, 2005; Hanrahan, 2009; Myers, Budruk and Andereck, 2011). Furthermore, involvement from tourism businesses, the holidaymakers and the host community is essential for the success of sustainable tourism. Their participation in all steps of management will contribute to public consciousness and facilitate the sustainable management of tourism in New Zealand. This locality and the local business community gain from direct and indirect benefits. The survival of many local businesses may be jeopardised without tourism as it assists the development of SME's and therefore enhances the entire local community. TTR failed to involve local stakeholders in a proper consultation regarding the proposed development, irrespective of the stakeholders involved in tourism.

The timeframe for stakeholder involvement of a process is also detrimental. In this case for the submission process, to review, comprehend and report upon requires more than four

weeks otherwise unattainable to submit a comprehensive review. Stakeholders were neglected of an adequate timeframe to review the vast documentation.

Have concern regarding the transparency and integrity of the process. As a concerned stakeholder based in Ireland, the application should be readily available and accessible online throughout the short timeframe of four weeks. As of today 11th October, each time on attempt to access the TTRL's application and information on the EPA's website (from this page http://www.epa.govt.nz/EEZ/EEZ000011/Public_Notice.pdf to <http://www.epa.govt.nz/EEZ/whats-going-on/current-applications/ttr-2016/Pages/default.aspx>), connecting to the following page stating "Page not found (error 404)":



This is certainly a fundamental flaw when you cannot access the application for review. Undoubtedly unacceptable during such a critical process. It is an ethical necessity that TTR provide transparency with all important environmental information. In the case of any misleading information or the void of sharing a full overview, the grounds of this alone forms a basis on why this proposal would necessarily need to be declined.

Maritime Archaeology

In the sustainable management of tourism, this also encompasses marine archaeology. As it is impossible to review the application at present, I am unaware if the TTR has included a

comprehensive assessment of the impact upon marine archaeology. This is a fundamental component. Research of this alone will be significant between human interaction with the sea, human remains, submerged landscapes and shipwrecks. Maritime archaeological research in New Zealand is a fascinating aspect as there are 2000+ shipwrecks around New Zealand's coast. Approximately 1200 of the more than 2000 known shipwrecks are protected by the Historic Places Act 1993. These are vessels that sank over 100 years ago. All shipwrecks are protected by the Maritime Transport Act 1994. The Marine Reserves Act also provides protection for wreck sites and is administered by the Department of Conservation. Therefore there are undoubtedly shipwrecks within or around the vicinity of the designated site however research is currently being undertaken and will be explored further. I am aware of the importance of New Zealand's rich Maritime Heritage. This aspect is one of the greatest personal concerns. This is a country which relied heavily on the ocean for transport, food and trade. Both Polynesian and European ancestors relied on this. I genuinely hope that the EPA grasp the detriment this may cause to Maritime Heritage and Archaeology, for this reason alone it is pertinent to decline the application.

Concluding Statement

A primary objective for any location in New Zealand should remain focused on safeguarding tourism by protecting environmental quality, this includes marine environment. Tourist Numbers and Revenue Tourism is one of the major contributors to the national economy and is a significant source of full time and seasonal employment. International tourism has grown to become New Zealand's second largest earner of foreign exchange, pumping around NZD10.3 billion annually into the nation's economy (Tourism New Zealand, 2016). The increase in tourist numbers and revenue deliver the additional revenue and jobs which this country needs. This area has a positive future with plans to tap into identified proposed developments for the future of tourism. There are many sectors yet to be explored further. As the shift towards the sustainable management of tourism destinations is being consolidated at an international level, the focus must remain on the drive towards the sustainable management of tourism destinations.

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In 2013, I completed a PhD which was part funded by Fáilte Ireland, National Tourism Development Authority in Ireland. The research focused on the sustainable management of tourism destinations. This incorporated a global perspective and an in depth understanding of eco-certification considerations as a management tool. Worked for a number of years in the tourism industry in France. While an Irish representative for Sustainable Travel International (STI), I assisted with helping Ireland's leading attractions - including the Cliffs of Moher and Guinness Storehouse - become eco-certified through STI's certification programme. My doctoral research was enhanced by trainings carried out through Vienna University, University of Szeged, Hungary and the IIIIEE at Lund University, Sweden. I have presented several doctoral research papers throughout academic institutes in Ireland, Europe and the European Parliament. The doctoral research is outreached through publications, with three International publications obtained this year while working for a remarkable sustainable

tourism business and education centre in New Zealand. I was a researcher on completing a study for Fáilte Ireland NTDA as part of the Applied Research Scheme (2013-2014) “Profiling tourism entrepreneurs and their enterprises along the Wild Atlantic Way and cataloguing their strategies to develop the International market in light of “The GB Path to Growth” The Tourism Recovery Taskforce (2012).” A best paper award was won with this research at the annual Tourism and Hospitality Research in Ireland Conference: Cork Institute of Technology (2014).

I have presented to an audience reaching 14,500 people in Colorado as represented Ireland as part of a team that became national and global winners of the software design Microsoft (MSFT) Imagine Cup technology competition 2011. The competition initially started with 358,000 student entrants from over 183 countries. We were featured in a mass of media campaigns such as RTE, TV3, CNN, Al Jazeera, Silicon Republic, Tech Central etc. Followed by onsite meetings with groups in Silicon Valley such as the Irish Innovation Centre, Stanford University, AVEGO, Harvard Business Angels, IDA Ireland and Enterprise Ireland.

I am in complete gratitude to return to such a tranquil environment and be part of a wonderful community in Ireland much similar to those in New Zealand where I have lived. It is with great regret to witness the beautiful marine environment of New Zealand at threat. Particularly as much of my academic research years were spent reviewing and in admiration of the great sustainable practices of New Zealand and Australia. The cultural and heritage dimension of sustainable tourism was strengthened due to the incredible policy and practices in place in the beautiful country of New Zealand. It is devastating to now gain insight to what is actually happening on the ground and no longer a ‘practice what you preach’ approach when confronted with these specific circumstances. I ask that you consider the concerns raised and refuse permission for this development. I also request that the EPA convene an oral hearing so that the local stakeholders will be entitled to substantiate their views with regards to this development and to provide me the opportunity to develop on my submission.

Yours Sincerely,

Aíne Conaghan (Ph.D., BBS, ADHP, DHP)

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