

From: hinemaria ward-Holmes [REDACTED]
Sent: Friday, 14 October 2016 5:01 p.m.
To: TTRLApplication; EEZSubmissions@ttrl.co.nz
Subject: Submission: hinemaria ward-Holmes, Trans-Tasman Resources Limited iron sand extraction and processing application

To whom it may concern

Please find my submission on the *Trans-Tasman Resources Limited iron sand extraction and processing application* (EEZ000011) below.

Please reply to this email in case there is a problem with this submission.

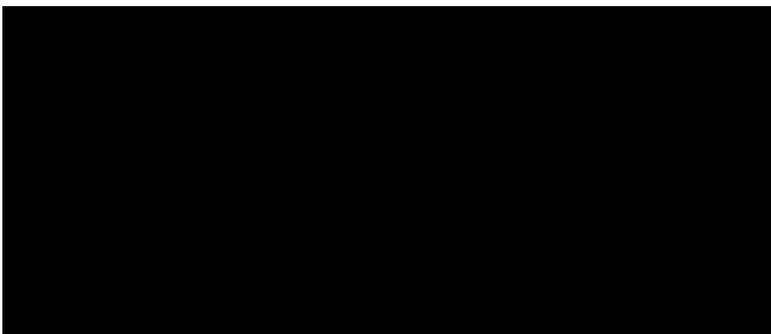
Sincerely,
hinemaria ward-Holmes

SUBMISSION FORM

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
Submission Close:	5:00pm, Friday 14 October 2016

1. Contact details:





Submitter Fax:



I/We confirm that I/we have authority to make this submission on behalf of the submitter(s) named on this form.

2. Spokesperson contact details:

Organisation (if relevant):

First name of spokesperson:

Last name of spokesperson:

Spokesperson Email:

Spokesperson Home phone:

Spokesperson Mobile phone:

Spokesperson Work phone:

Spokesperson Fax:

Spokesperson Postal address:

3. Electronic correspondence:

I can receive electronic copies of information and updates.

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

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

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

Decision: Decline

My reasons for seeking this decision are:

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.

I oppose the application in full as the proposed mining will devastate the marine environment within the mining area and have significant and unacceptable negative impacts on the surrounding marine area. The application does not satisfy the purpose of the 2012 Act. As with the first application, the uncertainties in the scope and significance of the potential adverse environmental effects mean it should be denied. Uncertainties and effects related to primary productivity and benthic effects and consequent ecosystem effects as well as the impacts on existing interests, notably iwi and fishing interests also mean the application should again be denied. Taking into account effects on marine mammals, the importance of protecting rare and vulnerable ecosystems and the habitats of threatened species, the lack of clarity about economic effects, it is clear that the life-supporting capacity of the environment would not be safeguarded and that the adverse effects of the proposal could not be adequately avoided, remedied or mitigated.

As kaitiakitanga or stewards of the ocean we must protect our marine environment from such destructive practices. This is the second application; the first was quite rightly declined in 2014. This is for the same activity and is just as damaging. It is unacceptable that the public and iwi must oppose such applications, especially where industry continue to fund repeat applications in the hope that the outcome will be different.

I oppose the application for the following reasons:

1. THE PROPOSED SEABED MINING ACTIVITY WILL BE IN BREACH OF DOMESTIC AND INTERNATIONAL LAW

A. Statutory Regime: The application does not satisfy the requirements of the EEZ and Continental Shelf (Environmental Effects) Act 2012 (EEZ/CS Act). The assessment of environmental effects is flawed, being based on inadequate scientific research. The applicant has failed to avoid, remedy or mitigate adverse effects to the marine environment.

B. Repeated Application: This application follows a previous application by TTR to mine iron sands from the seabed in the same location in 2013. That application was declined by the Decision Making Committee (DMC) as being insufficient in terms of analysis of effects to the environment. TTR states that it has updated its assessment in order that it should now be able to set this issue aside. The new information provided by TTR fails once again to adequately address environmental and other concerns and should once again be declined. There is not even certainty that TTR itself intends to carry out the mining. There is a possibility that it may just sell the consent, leaving further uncertainty on who would do the mining and how.

C. Treaty breach: The application 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.

D. International Law: The application fails to apply key international treaties to which New Zealand is a party including the 1982 United Nations Convention on the Law of the Sea, the 1992 Convention on Biological Diversity and the 1986 Noumea Convention. By allowing this application to proceed New Zealand will be in breach of its obligation under these conventions and international law including to protect and preserve the marine environment.

E. Precautionary Approach: The applicant has not provided a robust application proving that their proposal is safe for the marine environment and poses no threat to future sustainability. Taking a precautionary approach to major projects of this nature is internationally recognised and legally required.

The EPA must apply the precautionary approach to this application and apply the provisions of s10, s59(2) and 61 of the EEZ CS Act to ensure that the marine environment is protected.

2. THE APPLICANT, TTR, HAS FAILED TO CARRY OUT ADEQUATE CONSULTATION

A. Consultation: The applicant's consultation has been incomplete, insufficient and lacking integrity in the sharing of information. The information shared at meetings held by the applicant has been selective and inadequate. Despite, opposition from local iwi and tangata whenua, TTR has failed a second time to adequately engage. This has led to great difficulty for interested and affected parties to form an understanding of the total proposal and effects of the application.

B. The time frame for the submission process is too short. The Assessment of Effects alone is 320 pages long and its appendices 514 pages. There are over forty other reports attached to the application. Four weeks is simply an unrealistic timeframe for anyone who holds down a family and a full time job to read through and understand this volume of information in order to put forward a comprehensive submission.

C. The Applicant has attempted to further reduce public scrutiny by applying to keep important environmental information secret.

3. THE PROPOSED MINING ACTIVITY WILL DEGRADE AND IRREVERSIBLY DESTROY OUR MARINE ENVIRONMENT

A. Direct Effects to Seabed Ecology: The seafloor supports a wide variety of organisms, including plants, mussels and other shellfish, worms and crustaceans, which in turn support an extremely healthy fishery through a complex food web. The suction dredging crawler will suck up to 8000 tonnes per hour and remove the entire top surface of the seabed to a depth of up to 11 metres. It is certain that any plants or animals living in the sediment from the 65 km² excavation hole will be destroyed during the mining and sorting process, turning the mined area plus a significant area around the mining sites, into a dead

zone. Any plants or animals living on the seafloor at the tailing site will be smothered and killed. Regeneration times are unknown, if even regeneration is possible.

B. Indirect Impact to Seabed Ecology: Indirect impacts of the seabed mining are more varied and complex and cover a much larger area of the STB - perhaps as much as an order of magnitude larger than the mining zone. Many of these impacts are associated with the sediment plume generated by the mining and include changes to the physical, chemical and biological character of the water column and seafloor, which in turn alters ecosystem function and resilience of plants and animals all the way up through the food web, living in both the water column and on the seafloor. Many of the changes caused by the plume may not be immediately lethal, but instead are certain to stress the plants and animals in the water column and on the sea floor causing a reduction in plant and animal species diversity and abundance as well as ecosystem health and resilience over time.

C. Plume impacts: Sediment plumes consist of fine sediment that can remain in suspension for days at a time (as opposed to sand, which is heavier and will fall back to the seabed quickly). Sediment plumes are created at the time of mining and when the unwanted sand is dumped back down on the seafloor. The sediment plume will reduce the ability for life to exist in the surrounding area of the mining site. The plumes will impact phytoplankton and zooplankton and light penetration, affecting the food web. The discharged material is also chemically altered and will create adverse effects to the marine life, notably fish and larger marine mammals in the area. In total, the biology will be tremendously altered and recolonisation will be a very slow process. The re-establishment of balanced seafloor biology may take decades.

TTR have proposed use of flocculation, whereby fine sediments combine with other materials to sink faster, to reduce the projected effects of the plume from what was modelled in the previous application. There is great uncertainty around the ability of TTR to maintain sediment particle size, and around whether or to what extent the mitigation effect will be achieved. TTR in its first application ignored flocculation; now it relies on it as a primary mitigation technique. As the first DMC found, the proposed mining would have effects on the primary productivity of the STB, there would be decreases in both water column (phytoplankton) and benthic primary productivity that could result in a reduction of total primary production in the STB in the order of 10% and a reduction in energy input into the seabed ecosystem of up to 36%, there are likely to be significant effects on benthic productivity in areas under the sediment plume, and there is considerable uncertainty in predicting effects on the wider ecosystem and food web of the STB.

D. Impacts to Benthic Ecology and sedimentation effects: The covering of a few millimetres of sediment on the seafloor can cause the plants and animals living on and in the seafloor to be smothered, causing stress and resulting in a lowered ecosystem health and resilience. Although these effects are not always immediately lethal, they are still important. Over time sediment induced stress will result in lowered species diversity and abundance of these small (but very important) species at the base of the food web. The EPA Review of sediment mobilisation and transport states that some of the predicted effects are dependent on information provided by TTR and notes that commonly required information on the extent and duration of this smothering effect is missing. The application shouldn't have been allowed to proceed with such vital information missing.

E. Impacts to Primary Productivity: The South Taranaki Bight is a dynamic region with large plankton and zooplankton communities which are vulnerable to effects from the plume.

F. Heavy Metal Content of the Seabed: The higher the heavy metal content of the substrate the greater the effects from the plume as the higher volume of heavy metals released in the mining process would lead to a more toxic plume. Individual organisms need to be tested for tolerance to toxic metals, and independent review of heavy metal core samples and analysis should be undertaken and shared with the public so that the public is aware of what heavy metals could potentially be exposed and harm marine and human health, including through bioaccumulation and concentration through the food chain,

following the proposed mining.

G. Coastal Erosion: Large scale mining of the Tasman seabed will remove non-renewable sand resources that supply west coast beaches up to Cape Reinga. It will cause increased coastal erosion both up and downstream from where any mining takes place. The South Taranaki area already has severe coastal erosion issues and this mining activity has potential to exacerbate the erosion.

H. Marine Mammals: There have been no required surveys of marine mammals in the area. This is despite the first DMC finding that more baseline work should have been undertaken prior to the application being lodged. They also said that “We consider comprehensive and longer-term baseline studies of the presence of marine mammals in the STB would have assisted us to understand the importance of the STB to various species and what they use this area for (e.g foraging, breeding, calving, migrating etc.). The absence of this information leaves us uncertain as to the significance of the proposed mining area and the wider area of the STB affected by the mining operation to cetaceans.”

TTR only propose to conduct marine mammal species surveys as part of the later monitoring programme. This is unacceptable as the public and contrary to the findings of the first DMC, and the Committee will not have information about marine mammals that are or may be in the area. Marine mammal species such as blue whales and southern -right whales have a high potential to be impacted along with orca whales plus the highly at risk Maui and Hector's dolphins. Southern right whales are nationally endangered and are known to pass through the area. We also already know that the area is an important blue whale foraging area. Any adverse impacts to the migratory and resident mammal species could be devastating and must be avoided. Marine mammals will be particularly sensitive to effects from the large underwater and heavy metal content of the plume. Marine mammals are also particularly sensitive to noise from the activity. Noise and the plume will drive marine mammals away from the area.

I. Effects to seabirds: Surface noise and light from operations that run day and night will negatively affect seabirds and other wildlife. No attempt has been made to quantify these effects, and the only research has been done in an estuary, rather than open sea. As the first DMC found, there is a “lack of any field surveys undertaken and an understanding of the potential significance or not of birds in the STB. Given this, we find that we are still lacking an understanding of how important the STB is for seabirds and therefore the significance of the potential effects.”

J. Impacts to Fisheries: There are a wide range of fish species in the area. The project will impact those fish directly in the mining area, areas directly surrounding the site and those areas impacted by the plume. This could include spawning areas. As the first DMC found, there is significant uncertainty around the food web effects due to the primary production changes.

There are important recreational and commercial fisheries that will be indirectly affected by the proposal. The direct and indirect damage to the benthos and marine environment including sedimentation and downstream effects will affect fisheries and the food web. The noise, light and seafloor disturbance has a high potential to place the commercial, recreational and customary fisheries at risk. Disturbance of the seafloor may also mobilise previously settled pollutants, such as heavy metals, that can bio-accumulate in fish species. As the first DMC found, there is particular concern for human health around copper and nickel.

K. Impacts to Rocky Reefs in the area: The extent of rocky reef habitat in the area is not fully documented. The applicant has failed to adequately map all the rocky reefs in the area that may be affected by the activity. Again, the data in the application is unreliable. The reefs are biologically significant for the South Taranaki coast, providing habitat for encrusting and sessile fauna.

L. Impacts to Coral: It is likely that coral in the area will be smothered, but surveys have not been undertaken to identify them. This is an important effect which has been all but ignored.

4. THERE ARE OPERATIONAL RISKS WHICH WILL NOT BEEN ADEQUATELY PREVENTED OR MITIGATED

A. Risks from the vessels: The use of deep-sea moorings for stabilising the large extraction and export vessels will create adverse effects and destroy a large area of seabed. Oil spills have the potential to create significant adverse effects, particularly from the crude thick toxic heavy fuel transfer operations from ship to ship. There is no contingency plan as part of the application and instead TTR proposes to supply such plans later. This does not enable any analysis of risk to be properly undertaken because TTR itself is yet to undertake such analysis.

Waves in excess of 4 metres are routinely measured and have been in excess of 7 metres. These are extreme conditions for vessel management and a safety plan needs to be provided.

Use of Admiralty Bay in storm conditions is not an adequate plan. Admiralty Bay is an important feeding ground for about 200-300 male dusky dolphins each winter. DOC has expressed concern about habitat fragmentation in the bay and it appears that existing developments are already causing a decline in dolphin numbers. Bottlenose and common dolphins, NZ fur seals, gannets, shearwaters and king shags also use the area, which has commercial importance for mussel farms as well. There is a risk that spillage will occur during the transfer. It is not satisfactory that the Admiralty Bay risks are to be considered in a separate Resource Consent application, rather than looking in total at the impact of this application.

B. Insurance: The applicant only intends to provide insurance cover of NZ\$100m for environmental restoration of any “an unplanned event” during the term of seabed mining operations. Two issues arise from this. One is the definition of unplanned event, and the other is the amount. Even the in comparison relatively minor Rena disaster cost about \$130m. Such an oil spill could be among the lesser effects arising from this application.

A substantial Bond would be needed to counter the minimal vague insurance cover utilising Section 65 of the EEZ/CS Act to bring effective risk management.

5. OVERALL, NEW ZEALANDERS WILL NOT BENEFIT FROM THE PROPOSED MINING ACTIVITY

A. New Zealanders identify with the sea: Many New Zealanders have a unique and special relationship with the marine environment. The sea forms part of our identity. This application will undermine this relationship with the sea and all of its inhabitants.

B. Economic concerns: This is an overseas owned company. Profits will be directly exported overseas, while the risk of a potential ecological collapse in NZ remains. Low royalty rates of 2% will not deliver sufficient economic gains and will not provide economic benefits relative to economic losses resulting from the applicant’s proposal. Private profit, public liability is not acceptable.

Despite wildly exaggerated claims by the company, there are minimal employment opportunities, yet New Zealand’s clean green image and tourism will be undermined. As the first DMC found, any effects of the proposal on New Zealand’s tourism brand would be difficult to measure. Most of the workforce will be taken up by overseas personnel and the “fly-In Fly out” majority of workforce will not reside in Taranaki but come from elsewhere.

TTR claim that the industry will contribute \$159 million to GDP. Even if this is true, in contrast to the claims accepted by the last DMC (\$50 million, mainly the royalties and taxes), the economic benefits from this mining proposal pales into insignificance when compared against the economic costs: these include possible damage to the growing tourist industry; damage to the marine environment, damage arising from erosion, loss of surfing, swimmers, beach users, fishers and damage to the 'clean-green' image. This will in turn have ongoing adverse cumulative effects on coastal communities, people’s livelihoods and their quality of life.

Once again, inadequate evidence has been accepted by the EPA. Further progress of this application should be deferred until all evidence is at hand.

Tourism is one of New Zealand's largest export industries. The applicant only focuses on impacts on tourism in the immediate local area and fails to consider cumulative adverse effects to the larger region and New Zealand's overall clean green image.

The impact to recreational and commercial fisheries has not been adequately addressed. The applicant acknowledges that impacts to commercial fisheries in the local area will take place and has not provided any evidence that compensation will be paid to that sector. Nor is there an economic analysis of the loss to the recreational fishing sector. The potential loss to people's economic wellbeing and impacts to the local and regional area who rely on Kaimoana and the sea for their day to day lives will create adverse effects to those communities.

CONCLUSION

I request the DMC to grant permission for submitters or their experts to allow cross examination of the applicant's expert witnesses to provide for rigorous testing of the applicant's evidence.

I request that hearing venues are set in place in regional areas other than Wellington and Taranaki and that a hearing should take place on a Marae.

The application should be declined in full.

KASM SUBMISSION 18/12/13

Thank you for the opportunity to make a submission to this absurd idea to mine the seabed off the coast of Patea, in Taranaki.

This is the second time I have made a submission to this outrageous application from Trans Tasman Resources Ltd (TTRL). The 4800 odd submissions that were presented in December 2013, will still give you the same information of how this is such an absurd idea to mine our seabed.

To me it is very obvious that if you scrap away the bottom of the seabed you will destroy anything that is living there. You will take away the home of the various living creatures that are food to the bigger living creatures.

The food chain of the ocean.

For me to say that there is nothing living on the bottom of the ocean is un true.

Just because we cannot see under the ocean like we can see on land, doesn't mean to say it is dead, or there will be no impacts to the living.

<https://www.youtube.com/watch?v=RijB8wnJCNO>

Title: Cypress Hill - Insane In The Brain

I believe Seabed Sand Mining is a very crap idea because:

From the information I have read and gathered over more than 10 years that I have been aware of this absurd idea, I believe:

It will damage the environment by causing erosion on our beaches. The sand on our beaches is moved north by the ocean currents. Environment Waikato estimate the amount of sand arriving on any of our (Raglan) beaches each year to be an average of 150,000 tons per annum. Create a deficit of sand anywhere south of Raglan and eventually Raglan's beaches will get no sand for the period of the resource consent, normally 35 years with the expectation of renewal.

The beach is my backyard!

I am definitely not going to allow it to disappear!

That would be totally unacceptable, and plain stupid.

It will damage the environment by creating huge areas of the ocean that sea life will have to avoid.

Sucking up millions of tons of sand and all biological material contained therein will create a plume which will be carried by the current to smother hundreds of sq/km of ocean floor and a similar sized oxygen deprivation zone which sea life will not be able to live in. Dumping the unwanted sand after the

ore has been extracted will create a plume which will be carried by the current to smother hundreds of sq/km of ocean floor and a similar sized oxygen deprivation zone which sea life will not be able to live in.

Dechloriding the ore (washing the salt off) with waste water full of biological material will create an oxygen deprived dead zone of hundreds of sq/km.. All of which amounts to bad news for any sea life including the Maui's Dolphin whose entire habitat is covered by minerals prospecting or exploration permits.

Maui Dolphins are on the brink of extinction , a critically endangered species, and can not tolerate any further human impacts on their environment/ecosystems/food chain.

Just because they live in the ocean and we can not view them at all times like birds does not mean we have the right to endanger their lives!!

Seabed mining means no more Maui Dolphin...Gone forever! Deleted! Extinct!

I definitely do not want to be apart of a generation that did not save a mammal from becoming extinct!

This is 2013, we are a lot more aware of what is the right thing to do! Why would we not want to support a breed of mammal (maui Dolphin) from dying off? Its that simple!

It will damage the environment by interfering with the swell corridors. All clean surf breaks benefit from benthic (sea floor) structures that promote wave energy without breaking up of/or dissipating the swells.

A break like Manu Bay (in Raglan) is truly unusual and rarely found anywhere in the world.

Disturbances of the sea floor and tidal sediment flows is a threat to this and any other surf breaks of real quality. Dave Rastravich talked about a Gold

Coast Beach that suffered damage and lost its break. Pakiri beach north of Auckland is still damaged and Mundaka in Spain was a WQC surf event before its break was decimated by Seabed Mining, the mining stopped and the waves are coming back but apparently are nowhere near world class 10 years later.

There is no profit in it for the public of New Zealand. The mining companies have talked about steel mills employing many people as well as jobs mining and the billion dollar resource benefiting the countries balance of payments, GDP etc. There will be NO STEEL MILL. The workers in India and China work for less than the Employer Kiwi Saver Contributions of New Zealand workers and there are mills in both countries with mountains of spare capacity. The sea borne mining operation is a specialized trade and unless you are appropriately qualified you are unlikely to be one of the 12 or so people employed. There is no money. These are all foreign owned companies and our royalties scheme allows only 1 to 3% returns after all costs are met. Not exactly an economic boom.

Further more; Some of the lies we are told.

Its a virtual desert, nothing lives out there. This area is an epic fishing area. Truly world class and what are these fish eating/why are they here? Snapper, Kingfish, Kahawai, easy to catch. Regularly seen Orca, Common Dolphins, Seals and gamefish. All eating something.

This stuff is like concrete, its a nonsense to suggest the sand is moving around. This one beggars belief anyone that spends time on or in the water or at the beach knows that this dynamic environment is constantly changing and the sand is always on the move.

Our prospecting has enabled us to measure a small economically recoverable amount of about 500 million tonnes. On what planet is 500 million tonnes a small amount.

We have to mine somewhere, where will we get the materials to run our society? In a word recycling.

New Zealand dumps to landfill every year more steel than we currently use in manufacturing. This is a bit too hard for most folk who struggle to understand why recycling is critical for our society/way of life to continue, so generally I talk about the benefits of mining on land versus seabed mining. The main benefit being that all effects of on land mining can be seen, measured and contained by a seven wire post and batten fence.

Also the mined area can be replanted and put back somewhat, almost, sort of. Well really all mining is pretty damned destructive, but at least on land you can make it look like you tried.

- The economics relating to this application are not good for the region or the nation. The proposal is

specifically designed to minimise employment opportunities and does not provide jobs for existing members of coastal communities. There is no adding of value to the resource in New Zealand as it is directly exported to Asia without even coming ashore. These are the risks that this activity poses to the existing national economy through tarnishing New Zealand's trading advantage: our clean green image.

Against kaitiakitanga

The activity of seabed mining devastates the mining site and reduces the ability for life in the surrounding area to exist, degrading the quality of the oceans as a whole. This goes completely against Kaitiakitanga (or stewardship) by myself and my family and friends as tangata whenua and coastal communities over the environment.

Inadequate information

Both the Government and Trans Tasman Resources (TTR) have neither informed nor consulted properly with the myself, my family, and my friends, the people of New Zealand. We have not had enough time or information to properly understand the effects of seabed mining.

Threat to fisheries

Important recreational and commercial fisheries will be directly affected by seabed mining if TTR is allowed to proceed with their proposal to mine the seabed in the South Taranaki Bight. I want to be able to eat fresh fish from the ocean of NZ, why wouldn't you?

We need full understanding of threats.

A Precautionary Approach to this type of activity is absolutely necessary to ensure the lasting health of the marine environment. This means having a full understanding of the life that exists in the area – resident or transient – and how that life interrelates within the surrounding environment. The application is far from comprehensive in this regard. TTR say they want to minimise the effects?

What does that mean exactly? Please can that be explained.

TTR is committed to conducting all activities in a safe and environmentally sustainable manner'.

How safe would TTR be meaning?

What type of environmentally sustainable manner are TTR wanting to carry out?

Blue whales could forage here. I believe there is new evidence that they do forage here.

The South Taranaki Bight may be one of only five endangered Blue Whale foraging grounds in the Southern Hemisphere outside of Antarctica. It also hosts a variety of other marine mammals: Southern Right Whales, Orca, Hector's and Maui's dolphins. Any adverse impacts to these resident and migratory species must be avoided.

Why would any New Zealander want to allow any impacts on such marine mammals? Why would any person of the land allow this?

Mining site could be left a dead zone

The mining site is left as a dead zone and may take decades or generations to regenerate. The seabed supports a wide variety of organisms that, in turn, support an extremely healthy fishery.

Threat to phytoplankton, therefore the whole food chain

The sediment plumes created by the activities of dredging, transferring, washing and dumping of unwanted material (90% of what is mined), 24 hours a day, 7 days a week for 20 years, will reduce the ability for life to exist in the surrounding area of the mining site. For example, the reduction of light reduces the production of phytoplankton that form the base level of the food web. Reduce phytoplankton in an area and we reduce all life in that area. Reduce life in one area and this affects surrounding areas.

When would one wish to reduce life within the food web?

24/7 nature of activity is entirely unnatural

The 24/7 'press' nature of this human activity is very different than the stirring up of sand by natural 'pulse' events such as large storms. The natural systems are cyclical and there are calm periods where the water column clears and organisms thrive. The 'press' impact of seabed mining does not fit within the natural existing regime that creatures in the area have adapted to through evolution.

The economics simply don't add up

The economics relating to this application are not good for the region or the nation. The proposal is

specifically designed to minimise employment opportunities and does not provide jobs for existing members of coastal communities. There is no adding of value to the resource in New Zealand as it is directly exported to Asia without even coming ashore. These are the risks that this activity poses to the existing national economy through tarnishing New Zealand's trading advantage: our clean green image. We have a reputation to keep hold of, so as to continue to welcome other visitors to our lands of NZ. So many other parts of the world do not have a clean green image. Tourism is very important for NZ. Coastline, beaches, wild life, fishing industry, kaimoana. It all is apart of us as a New Zealand citizen. It was only a few years ago, (a couple of generations ago) now when we experienced colonialism, which came the taking of the lands, the poisoning of the land and rivers. the introduction of unwanted plant and animal pests, and diseases, and sickness, banishing the many native peoples, Maaori. When will the government realize that they are wanting to repeat history all over??

It is not worth the risk of allowing such an outrageous idea of Seabed Mining!!

It is not worth the risk of this precedent setting application to go ahead.

If we think for a moment that we are dealing with human rights issues.

I believe there should be a moratorium on all seabed sand mining. I want to see this happen, and I want to get across to the EPA, or actually I believe, there is more than enough evidence for any sound minded, unbiased human, to understand, if you take away the food chain, you take away life. The Life is destroyed! It will be just absolutely devastating!

When I was a child, and I went crab hunting, I was always told to put the rock back where I lifted it up from. I was told, that was the crab's house.

How about we do not destroy the home of our fish, all the marine life.

Why would you not want to eat fish from our oceans?

So that others will get money, as I do not believe us as NZ citizens are going to get any benefits from any royalties paid, for such a crap idea. So that a few people will get a job.

Who really is going to gain out of this? I believe not you or I? If we imagined this to be on land, would we have even allowed companies to even start exploring such a vast area? To start exploring and destroying the homes of people and wildlife, to such an extent? When it is the ocean we seem to want to let it be invisible. But from what marine professionals tell us, from what they see, the oceans are being destroyed, Life under the oceans are being destroyed.

That is why I believe Seabed sand mining is a crap idea!

Many thanks for your time, please make the best decision for you and I and all other New Zealanders, including our children and the children to still be born to, this land, our land, this earth. Hence studying the evidence not only within the many submissions, but the evidence around the world. We are clever people. We don't allow destruction, for no reason, for no gain.

Submission by Hinemaria Ward-Holmes 554 Okete Rd Raglan Waikato to TTRL Application.

3.11.4.2 Existing Interest Parties – Commercial Fishing

With regard to parties / representative bodies with lawfully established 'existing interests', those that relate to commercial fishing interests within the project area have been identified as:

- Sanford Ltd;

- Talley's Group Ltd;

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- Te Ohu Kaimoana;

- Fisheries Inshore New Zealand;

- Aotearoa Fisheries Ltd;

- Raukura Moana Seafoods Ltd;
- Ngai Tahu Seafood Resources Ltd;
- Ngati Porou Seafoods Ltd;
- Pupuri Taonga Ltd;
- Alpine South Fishing Ltd;
- Shirley Shields and Catherine Boaler-Walls;
- Egmont Seafoods;
- Ian Brown;
- Nelson Vessels;
- Connor Family;
- Ian McDougall; and
- Lyle Jenkins.

The effects of the project on commercial fishing interests' area discussed in Section 4.15.1.

3.11.4.3 Aquaculture

If adverse weather conditions are present within the project area, there is the potential that some of TTRs project related vessels may seek shelter in Admiralty Bay.

Sheltering - what does this mean?

How will the vessels shelter in Admiralty Bay?

If and when these vessels Shelter in admiralty Bay, will they require fuel, oil, to allow the vessels to funtion?

Admiralty Bay has been identified due to the relatively deep waters and the greatest likelihood of experiencing sheltered sea conditions compared to the STB in the event of a large storm.

Admiralty Bay lies approximately 100 km south of the project area within Te Tau Ihu (top of the South Island) region, where eight iwi groups are represented under the Te Tau Ihu Settlement Bill, currently hosts longline mussel farming and is part of the \$276 million⁴¹ aquaculture export industry within the Marlborough Sounds.

TTR project-related vessels would not undertake any activities within Admiralty Bay other than sheltering and therefore, will present no additional risks compared to any other vessel sheltering in Admiralty Bay at that time. TTR has assessed the proposed sheltering activities in Admiralty Bay against the Marlborough Sounds Resource Management Plan and consider that the anchoring of 41 2014 any project-related vessel within Admiralty Bay will not breach any of the Rules in the Plan.

If disturbance to the seabed was greater than 20 m³, the activity would be considered as discretionary

under the Marlborough Sounds Resource Management Plan and a coastal permit would be required. However, due to the size of the vessels being used, the anchoring of any TTR project-related vessels will not disturb an area of seabed greater than 20 m³; hence, no coastal permit will be required. As vessels will only be using Admiralty Bay for safe harbouring in adverse weather events, and no resource consents or marine consents required for such activities, TTR does not consider that this activity constitutes an 'effect' any on party that may have any existing interest within this area. TTR also note there is no aquaculture activities undertaken within the STB. The potential effects of the project on. I have huge concerns about this sheltering in the Marlborough sounds. Please what is the assurance that there will be no spillages or impacts to these pristine waters of Aotearoa.

Thanks for your time.
A very concerned citizen of Aotearoa.

6. Do you have an existing interest that may be affected by what is proposed in this application?

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

END OF THE SUBMISSION FORM