

**Minerals West Coast feedback on exposure draft of Te Tai o Poutini One District Plan
Friday 11th March 2022**

Introduction

1. Minerals West Coast is a charitable trust representing the minerals sector on the West Coast. Our mission is to promote, encourage, and support the mining industry on the West Coast. We are governed by a group of voluntary trustees, most of whom have a direct interest in the industry in the region.
2. Our members include gold and coal mining companies, as well as those with an interest in quarrying and earthmoving. These businesses range from small scale, solo operators, to larger firms employing anywhere up to one hundred staff across different sites, as well as some of New Zealand's largest mining companies. Other members include training institutes, engineering and mechanical support services, and geologists.
3. It's estimated the West Coast minerals sector employs about 600 people directly, in doing so supporting about as many contractors and support units. Mining jobs in the region pay about double the median annual salary, and in total the sector contributes to about 8.4% of regional domestic product. The median annual earnings in the mining sector is \$86,230, compared to West Coast region's median annual earnings of \$46,580. Accommodation and food services, for comparison's sake, pays about \$24,060, half the median salary.
4. It is also worth noting, mining, through the production of coal, enables the economic production and processing of dairy, meat, and horticultural produce, for which there is currently no economic alternative, and ensures cost-effective infrastructure through the extraction of aggregate.

1. Minerals Extraction Strategic Objectives need to be expanded to full chapter

Minerals West Coast supports the six strategic objectives that have been outlined in the exposure draft for the plan, and notes that other objectives and policies in all other chapters are to be read in a manner consistent with the Mineral Extraction Strategic Objectives.

Minerals West Coast considers it possible for these objectives to be achieved in a manner consistent with the strategic objectives outlined in the other chapters, particularly the Natural Heritage Strategic Objectives and the Ecosystems and Biodiversity Objectives.

One issue that may arise is in instances where there is tension between these objectives, where there will need to be clarity on how such tensions can be managed.

Outlining more clearly – perhaps through an expanded Mineral Extraction chapter with its own set of policies and rules – how these tensions will be managed could be beneficial.

This would allow to clearly state how tensions between mineral values and other competing values in the same area or piece of land.

2. Need for clarification where tensions arise

The Buller Coalfield Zone (BCZ), the Minerals Extraction Zone (MEZ), and rules in the General Rural Zone and Rural Residential Zones are in isolation enabling.

A source of confusion, however, is what is given weighting when the BCZ and MEZ are overlaid by Significant Natural Areas, Outstanding Natural Landscapes, or Outstanding Natural Features, and how these tensions will be managed.

In addition, it is not clear what consenting pathway is to be followed in an instance where mining may be necessary in an area of significant indigenous biodiversity, ONL, ONF etc.

Geology dictates first and foremost where mining can occur. Minerals West Coast supports the protection and enhancement of biodiversity, landscape, and other natural values.

Where mineral values and biodiversity or landscape values intersect, mining can still be carried out responsibly in keeping with the objectives of the Resource Management Act. In these instances, Minerals West Coast supports a consenting pathway that provides access to the effects management hierarchy.

This allows use or development to in the first instance:

- Avoid, and where not possible:
- Mitigate, and where not possible:
- Remedy, and where not possible:
- Offset, and where not possible:
- Compensate.

Where restrictions do apply as a result of overlays or other provisions, this consenting pathway needs to be clearly available.

3. Manner in which SNA and ONL values have been determined

Minerals West Coast notes that it is not clear by which processes the SNA and ONL overlays have been determined in Te Tai Poutini Plan, and these may impose unnecessary difficulty or cost on mineral extraction while having no material benefit to the Natural Heritage Strategic Objectives or the Natural Features and Landscapes Strategic Objectives.

In any instance, the key point is that where mineral extraction is not a permitted activity there must be a clear and defined consenting pathway (as outlined above) that is able to allow for mineral extraction to occur in a way that causes no net loss (and preferably a net gain) to other values, e.g. indigenous biodiversity.

4. Facilitation of additions to MEZ and lawfully established activities

Minerals West Coast supports the enabling intent of the Minerals Extraction Zones (noting that it is anticipated there will be mining outside of these defined zones) and the provision for lawfully established mineral extraction and processing areas.



Minerals West Coast would urge that given the possibility some minerally prospective areas or lawfully established activities may have been inadvertently left out of these zones/schedules, provision for retrospective addition to these areas should be written into the plan provided a case can be made for doing so.

In light of the unnecessary cost to some operations that could result from being excluded from this list, a provision for retrospective addition should be considered prior to notification or finalisation of the plan.

In the event mineral resource knowledge or economics change in in future due to resource demand or technological improvements, it may be that areas of the West Coast experience higher levels of mining than can be anticipated at present. Mechanisms for addition of new Mineral Extraction Zones to the plan should be considered, including but not limited to plan changes.

Further discussion

Minerals West Coast would welcome any opportunity to speak further to the feedback outlined above, and to work with the planning committee on any revisions of the exposure draft prior to notification later this year

-ENDS-

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