

Te Kaahui o Rauru



Ngaa Rauru Kiihahi Iwi

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Submitted online:

The Decision Making Committee
Environmental Protection Agency
WELLINGTON

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Teena koutou

Trans Tasman Resources Limited application for marine consents and marine discharge consents to extract and process iron sand in the South Taranaki

This is an additional submission written in regard to the recently released plume information. Our previous submission remains unchanged; however, we note the overturn of the decision to withhold this plume information leaves us feeling disquiet that if these community organisations hadn't undertaken court action, we would not have seen the information. We are disappointed the EPA did not initially prioritise transparency in a public consultation more highly.

We also note with concern that having seen parts of the Taranaki Regional Council submission to you, there is significant understatement and generalisation around iwi views and engagement on this application. This is magnified by the Department of Conservation's similar approach, working with the applicant directly and apparently not understanding or undertaking their Treaty obligations and commitments to us. We submit in strong opposition to this application.

While the proposed operation occurs within the EEZ, impacts are also identified in the Coastal Marine Area. In the Ngaa Rauru Kiihahi Claims Settlement Act 2005, there is a statutory acknowledgement for the Coastal Marine Area adjoining our rohe. This acknowledges association of the cultural, spiritual, historical, and traditional connections of Ngaa Rauru Kiihahi with the Coastal Marine Area adjoining the Ngaa Rauru Kiihahi area of interest.

As previously stated, the extensive knowledge gaps in the area that will be subject to the plume, including reef systems, means the impacts are likely to be seriously understated. Given the extremely special status of this area, a lack of information is unacceptable.

It is also important to not accept the sediment-laden flows from rivers like the Whanganui are a valid part of a benchmark level of water quality. This is not a “natural” occurrence and there is effort going into reducing the erosion and run-off generating this, so is likely to reduce over time. It is also a relatively recent change to the river’s flows with the changes in land use in the past few generations, and not consistent with the river’s state in traditional times.

There is a lack of clarity around the flocculation tests done in this report. The upscaling was from a beaker to a 21cm bucket. There appeared to be no testing done at a larger scale. It is unclear whether this method of modelling flocculation is accepted and transferrable to the South Taranaki bight, with its extreme conditions. The reports quoted are from places with quite different conditions, e.g. the Thames.

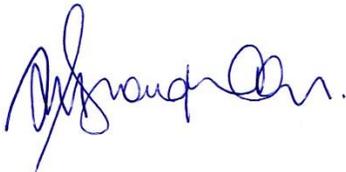
It is also unclear what “shear stresses” this environment will be subject to, where the resuspension of sediment is possible and flocculation is reversed. The model also showed a clear jump from 0.3 to 0.4 Pa in shear strength. Our rohe is recognised as a high energy environment so justifies an additional level of precaution.

There is a lack of ground-truthing with the research done into the potential impacts. With a proposed operation of this scale, it is deeply concerning the applicants are relying almost entirely on modelling in relation to the sediment plume, especially given the relatively new technology. The added complexity inherent with an underwater extractive activity requires a higher level of certainty than is demonstrated in the application.

The uncertainty and insufficiency of information about all of these effects is extremely concerning. Therefore, based on these concerns and the values of Ngaa Raurutanga, Ngaa Rauru Kiitahi oppose the granting of consent to Trans Tasman Resources Limited.

We wish to appear before the Decision Making Committee and respectfully request that a hearing be conducted on one of our marae.

Noho ora mai



Anne-Marie Broughton
Kaiwhakahaere/General Manager