

SUBMISSION ON NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT

1 Dunorling Street
PO Box 122, Alexandra 9340
New Zealand

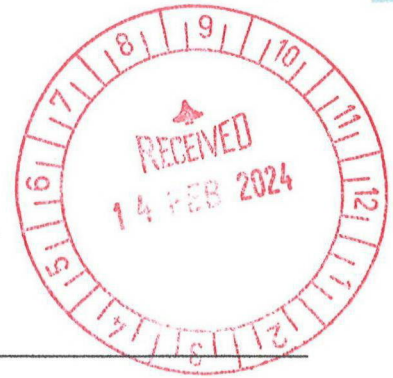
(Form 13)

03 440 0056

Section 95A (public) Resource Management Act 1991 @codc.govt.nz
w.codc.govt.nz

To: The Chief Executive
Central Otago District Council
PO Box 122
Alexandra 9340
resource.consent@codc.govt.nz

166



DETAILS OF SUBMITTER

Full name: Graeme Young

Contact person (if applicable):

Electronic address for service of submitter: gyoung478@yahoo.co.nz

Telephone: 021 0632424

Postal address (or alternative method of service under [section 352](#) of the Act):

1266 Teviot Road, R.D.2 Roxburgh 9572

This is a submission on the following resource consent application: RC No: **230325**

Applicant: **Hawkeswood Mining Limited**

Valuation No: **2847310501, 2847319901, 2847319902, 2847320100, 2847320000, 2847319903, 2847319900, 2847319801, 2847319802, 2847319300, 2847319800, 2847320400.**

Location of Site: **Rural Resource Area at 1346 – 1536 Teviot Road, Millers Flat, Roxburgh.**

Brief Description of Application: **Land use consent to establish and operate an alluvial gold mining operation.**

Submissions Close 19 February 2024

The specific parts of the application that my submission relates to are:

(give details, attach on separate page if necessary) See attached

This submission is: *(attach on separate page if necessary)*

Include:

- *whether you support or oppose the specific parts of the application or wish to have them amended; and*
- *the reasons for your views.*

See attached.

I/We seek the following decision from the consent authority:
(give precise details, including the general nature of any conditions sought)

To decline this resource consent application.

I support oppose the application OR neither support or oppose (select one)

I wish / do not wish to be heard in support of this submission (select one)

I am am not a trade competitor for the purposes of [section 308B](#) of the Resource Management Act 1991 (select one)

I/We am/am not (select one) directly affected by an effect of the subject matter of the submission that:

(a) adversely affects the environment; and


(b) ~~does not relate to trade competition or the effects of trade competition.~~

~~*Delete this paragraph if you are not a trade competitor.~~

*I/We will consider presenting a joint case if others make a similar submission

~~*Delete this paragraph if not applicable.~~

I request/do not request (select one), pursuant to [section 100A](#) of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority. "See note 4 below as you may incur costs relating to this request."


Signature
(to be signed by submitter or person authorised to sign on behalf of submitter)

9/Feb/2024
Date

In lodging this submission, I understand that my submission, including contact details, are considered public information, and will be made available and published as part of this process.

Notes to submitter

1. If you are making a submission to the Environmental Protection Authority, you should use [form 16B](#).

The closing date for serving submissions on the consent authority is the 20th working day after the date on which public or limited notification is given. If the application is subject to limited notification, the consent authority may adopt an earlier closing date for submissions once the consent authority receives responses from all affected persons.

2. You must serve a copy of your submission on the applicant as soon as is reasonably practicable after you have served your submission on the consent authority.
3. If you are a trade competitor, your right to make a submission may be limited by the trade competition provisions in [Part 11A](#) of the Resource Management Act 1991.
4. If you make a request under [section 100A](#) of the Resource Management Act 1991, you must do so in writing no later than 5 working days after the close of submissions and you will be liable to meet the additional costs of the hearings commissioner or commissioners, compared to our hearing panel. Typically these costs range from \$3,000 - \$10,000.
5. Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):
 - it is frivolous or vexatious:
 - it discloses no reasonable or relevant case:
 - it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
 - it contains offensive language:

it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Att. Central Otago District Council.

I wish to state my opposition to the Hawkeswood Mining Ltd Resource Consent application RM 23.819.

My wife and I moved to our lifestyle property on Teviot Road 5 Years ago. We were attracted to this locality by the stunning scenery, proximity to the Clutha River and Cycle Trail and the lovely tranquil setting. Our property was already connected to the Millers Flat Water Scheme, which was an added bonus.

As a lifelong recreational fisherman, the river access just below our boundary was a special delight. From this access I can fish around 350m of riverbank. To begin with the fishing was good, but sadly now the fish in my stretch of the river have all but gone. Their habitat has been buried beneath huge swathes of algae.

The Clutha River is New Zealand's most fished river with around 31,000 angler days per year. (Fish and Game survey 2020). The river is a vital and valuable amenity to our district and our region, so dependent on visitors and tourists. It's a Statutory Acknowledgement Area.

The Otago regional Council has made public its concerns over the deteriorating state of Otago rivers (ODT 26th July 2023) stating "drastic action was needed to clean up polluted rivers". The article suggested previously consented activities may have to be discontinued. Concerns about Nitrate and E-coli levels in the river catchment close by the proposed mine site (Benger Burn) have also been made public. A small creek passing through my property and discharging into the Clutha has tested as high as 760 cfu per 100ml! About 3 times a safe bathing level!

The environmental impacts of open cast mining are well documented. Some countries around the world have banned it altogether. (e.g. Honduras, El Salvador, Costa Rica). Operating a huge open cast mine just 20m from the river's edge with settling ponds only 50m from the water cannot be discounted as an environmental and health risk. There will be no such buffer between the mine pit, filled with contaminated groundwater, and the unconfined groundwater that extends from above Teviot, through the mine site and Millers Flat to culminate around Island Block. (docs.niwa.co.nz).

We know from council records, the mine site is already contaminated.

We know the mining company is prepared to break the rules. e.g. CODC abatement notice re excessive excavations of around 40%. (CDOC S95A-F). They have exceeded the allowed stockpile heights, at around 10m. They have arbitrarily blocked public access to the river.

The mining company's activities have already impacted the community. We've all heard the noise! We can all see the mountainous stockpiles. How can a 4m high bund stop the noise from building a 7m high stockpile? The acoustics report compares machinery only similar to what might be in operation in the mine and makes extensive use of computer models to evaluate impacts on those in the community. The noises from the mine are in addition to the noises we hear every day. These countryside noises are intermittent and generally of short duration. The noises from the mine could last for up to ten years! And yet the applicant insists the 'temporary' duration of the mine is a mitigating factor!

The medical profession is still learning about the health risks associated with particulate matter, yet the applicant believes they can train a couple of staff to deal with this.

The applicant claims this mine will be a low emissions project. In their second application they concede that they will be storing 60,000 litres of diesel on site. That's enough to fuel 1000 cars. A country garage might typically store 10,000 litres of diesel.

Diesel produces 2.6391 kgs of CO2 per litre burnt. (comcar.co.uk)

That's 158 tonnes of CO2 per tank full. We're not told how long this huge quantity of diesel will last.

The associated health risks of burning diesel are well documented.

S&P Global-Market Intelligence estimates gold mining produces at least 0.8 tonnes of CO2 per ounce of gold recovered.

Science direct . com calculates 1.5 tonnes of CO2 is produced per ounce of gold recovered, excluding methane.

My wife and I are not the only locals to have noticed diesel fumes coming from the site when passing by along the Cycle Trail. We rarely use that part of the Trail passing the mine now as it is not the kind of environment we moved here to be a part of. We sometimes have conversations with cyclists as they pass by our property or as we meet them on the trail. Not one has had a positive opinion of the mine site.

This summer has been quiet for the trail passing our home. Another local who has a hospitality business alongside the trail concurs they've had a quiet summer as well. Yet I'm told other trails in Otago are busy. Wild fruit along the trail above our property hasn't been stripped from the branches as it normally is by passing cyclists. Could this be a portent of things to come if the mine gets under way?

Do we need any more gold? "Researchers at the Smith School of Enterprise and the Environment, at the University of Oxford have called for an end to gold mining in a paper published in 'Environmental Research Letters', because recycled gold would be sufficient for the limited essential services and products the metal provides". "Gold mining stands out for the scope of its harmful impact. The transition to a circular gold economy offers a plausible, if partial, pathway toward a more sustainable world". (smithschool.ox.ac.uk).

Major jewelry brands like Pandora, operating in over 70 countries, have committed to only using recycled gold by 2025. Apple, recently set a goal to use only recycled gold by 2030. These are examples of the growing distaste for an industry that produces more greenhouse gases than all passenger flights between European nations combined. (The Conversation website) And can wreak havoc in large and small communities. e.g. The Elect Gold Mining Company caused damage to the Ross water treatment plant on the West Coast and contaminated the town's water supply in February 2018.

I make a significant part of my income from tourism and have done so for more than 30 years. I'm a property manager administering commercial leases in Queenstown. One of those leases is tenanted by a booking agency. I asked the young manager one day if they would book customers on a cycle trail passing by and/or through an open cast mine. He thought about it for several moments and shook his head. "We want our clients to have a positive experience" he replied. We google mapped the mine site and Millers Flat, including our home on one of their large computer monitors and I indicated the proposed mining site. Three young staff, two from the UK and one from Canada, all expressed dismay that a mine could operate in such proximity to the river, people's homes and the cycle trail. The young

Canadian lady had to leave us to attend to a customer and her parting remark struck me as indicative of her generation's perception of open cast mining. "Oooh Yuckkkk!" she said.

I'm planning to leave the tourism sector as our country's brand, "Clean Green, 100% pure New Zealand", is in tatters. Just about the last thing this industry, and the country needs, is an advertisement for environmental vandalism as depicted in the aerial photograph in "The News" (Sept. 28th 2023). This moonscape, which is the subject of an abatement notice, dwarfs the mighty Clutha River behind. The mining company believes a history of gold mining in the area justifies continuing this kind of activity. We used to clear-fell native bush. Does that justify continuing to fell what remains of that valuable resource?

Another negative impact we believe the proposed mine will have, is on local property values. As part of my job I work closely with property valuers and real estate agents to ascertain the potential yields of leases. The surrounding environments have a profound effect on the value of the lease. With this experience I believe the mine will have a detrimental effect on property values, as well as reducing the number of potential buyers. If we had known a mine like this one could be consented in the valley, we would not have moved here. Those elderly residents compelled to sell during the lifetime of the mine can least afford a drop in their asset values.

As relative newcomers to Millers Flat we have some idea why people might want to come here to live. It's the quiet tranquil environment that appeals to lifestyle seekers like us. The beautiful countryside with fabulous views and clean, untreated water is hard to resist. Our great wee community needs newcomers. The next few years will be critical to establish a base of resident's young enough to be able to support the community into the future. Without these newcomers we don't have a future. Who seeking a lifestyle, would want to move to a community dominated by an open cast mine?

This community needs amenities like fibre optic broadband. Pensioner housing. Affordable and reliable electricity. Rental accommodation. A medical centre which has doctors. Volunteers and the funding they need. A safe water supply. An environment to attract visitors and tourists and prospective residents. We don't need a multi million dollar dirty hole in the ground!

It's a concern for us and others the absolute confidence with which Hawkeswood Mining Ltd has progressed this project so far. Buying land (under another name). Exceeding excavation amounts resulting in an abatement notice. Boasting of huge dump trucks coming from Europe. They claim to have imported pre-fab worker accommodation from China. They have installed the Waikaia dredge on site after being "forced into a corner" to purchase it apparently. They have built considerable mining infrastructure. They even claim to have appointed a mine manager! All of this without consents from either Council to operate a mine!

What gives Hawkeswood Mining Ltd this much confidence? Or do they plan to simply bulldoze councils into submission having spent so much money and implemented so much infrastructure? This seems to be the plan with the company allegedly having talks with Shane Jones MP, the mining advocate in Wellington. No doubt in an effort to expedite the consent process at local government level, rather than put the effort into producing the information required by councils.

I have seen some of the documents the applicant has submitted to Council for consent and am astounded they believe filthy and illegible pages are suitable material to submit as part of an application.

Olivia Stirling, a consultant planner, has said of the proposed mining project. "I do not agree that the proposed development is compatible with the surrounding environment".

Jess McKenzie, a landscape architect peer reviewing the mining company's 2nd application is unhappy with that application due to inaccuracies and lack of information. She does point out however, "due to the particularly long duration of some of these activities the temporary nature is not considered a mitigating factor when determining the degree of adverse effects particularly from private residences".

Hawkeswood Mining Ltd claim, "There will be no persons adversely affected by the proposed development". A development they concede they haven't undertaken in such proximity to people's homes before. A project involving the excavation of 12 million cubic metres of earth and gravel. Does this count that material being rehabilitated, or should we be counting on something like 20 million cubic metres of material being shifted? This statement from the Mining Company is dismissive and offensive to those of us already affected by the project.

The mining company boasts of the huge social and economic benefits to the local economy, but don't explain how we will all benefit from this wealth and prosperity.

Dr Richard Antiss, an environmental geo-chemist with links to Auckland University of Technology and the Trace Element Research Group says. "Small Councils lacked resources and expertise to monitor complex pollution issues and often only the mining company had the data on how much leakage there was from mines".

"In small communities, mining companies had a lot of influence".

"Responsibility for mining had devolved to local councils but that has led to a lack of transparency".

The Central Otago District Council owns approximately 4 ha of this mining site and stands to profit if the mine goes ahead. This is an obvious conflict of interest. How can a district Council advocate sustainability, yet accept royalties from an open cast gold mine, the antithesis of sustainability?

I urge the Central Otago District Council to decline this application, as it is out of step with enlightened thinking, Te Mana o te Wai and the United Nations sustainability goals. An application riddled with ambiguity that proposes a project totaling earthworks around 12 times the size of the Clyde dam and excavations four thousand times that currently permitted. This project will harm the environment and is already negatively impacting the local community.

Kind regards,

Graeme Young.