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## **NZ Sport Fishing Council submission on the Trans-Tasman Resources Marine Consent Application**

- The New Zealand Sport Fishing Council submits the Environmental Protection Authority decline the Trans-Tasman Resources Limited marine consent application to mine iron sand in the South Taranaki Bight.
- The New Zealand Sport Fishing Council would like to be heard if a panel is convened to consider public submissions on this application.

### **NZ Sport Fishing Council**

1. The New Zealand Sport Fishing Council (NZSFC) appreciates the opportunity to submit on the Trans-Tasman Resources Ltd (TTR) application for a marine consent to undertake an iron sand mining project in the South Taranaki Bight, within New Zealand's Exclusive Economic Zone. TTR released their application on 21 November 2013 with submissions due by 19 December 2013.
2. NZSFC representatives are available to discuss this submission in more detail if required. We look forward to positive outcomes from this review and would like to be kept informed of future developments. Our contact is Roz Nelson, [secretary@nzsportfishing.org.nz](mailto:secretary@nzsportfishing.org.nz).
3. The NZ Sport Fishing Council is a national sports organisation with over 32,000 affiliated members from 55 clubs nationwide.
4. The New Zealand Sport Fishing Council has initiated LegaSea, a public outreach organisation, to generate support for the ongoing effort to protect and enhance the public's access to abundant fisheries in a healthy marine environment. [www.legasea.co.nz](http://www.legasea.co.nz)
5. The intention is to broaden NZSFC involvement in marine management advocacy, research, education and working together on behalf of our members and LegaSea supporters.
6. We are committed to ensuring that sustainability measures and environmental management controls are designed and implemented to achieve the Purpose and Principles of the Fisheries Act 1996, including "maintaining the potential of fisheries resources to meet the reasonably foreseeable needs of future generations..." [s8(2)(a) Fisheries Act 1996]

## Background

7. Trans-Tasman Resources Ltd (TTR) has lodged an application with the Environmental Protection Authority (EPA) to mine the seabed for iron sand off the coast of Patea, South Taranaki, pursuant to the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012.
8. The EPA is a Crown agent responsible for deciding marine consents. The EPA Board has appointed a committee of experts to decide on the TTR marine consent application.
9. The marine consent would allow for the mining of 65 square kilometres of seabed for a period of 20 years. It is the first application made under the recent Exclusive Economic Zone legislation.
10. The EPA advises Trans-Tasman Resources Ltd intends to extract a maximum of 50 million tonnes of the seabed each year in depths ranging from 19 to 42 metres. The proposal area covers 65.76 square kilometres of seabed between 22 to 36 kilometres offshore of Patea.

## NZSFC Submission

11. The New Zealand Sport Fishing Council (NZSFC) **submits the EPA decline the application.**
12. The NZSFC has three major concerns with this application:
  - a. The enormous scale of the proposal for a process that has not been used or understood in the context of the New Zealand continental shelf.
  - b. The unknown consequences of releasing sediments taken from depths of up to 15 metres or more below the sea floor.
  - c. The precedents set in relation to any granting of a licence to mine the seabed, particularly in respect of environmental standards that apply to any such licence.
13. The scale of the application is staggering. Removing 50 million cubic metres of seabed and bringing it to the surface, screening and washing and then dumping the overburden in a highly mobile state back to the seafloor is an enormous engineering challenge.
14. There are no proposals for a small-scale operation to discover what chemicals are released, what the final deposition footprint will be, and the measured effect on benthic marine life.
  - The NZSFC recommends the EPA deny approval to any seabed mining in the absence of any trials that test the proposed process and enables real data to be gathered.
15. The studies undertaken already, although voluminous, do little to mitigate the risks that a full-scale operation represents. Modeled and theoretical outcomes are not to be trusted when approving mining processes capable of releasing huge amounts of metals into the marine foodweb.
16. The NZSFC holds grave concerns for the Patea basin marine ecosystem if sediments with particles less than 10 micron are released as part of the tailings being pumped back down to the seafloor via a deposition pipe approximately four metres above the seabed. Fine particulates remain suspended for a long time and can travel great distances, especially in such a dynamic marine environment.
17. There is an identified risk of heavy metals being taken, particularly from deeper sediments, and returned suspended in the waste-stream. The risks that this contaminated waste poses is not answered in the applicant's supporting papers, yet it is crucial to assessing the effects of granting a licence.
18. It is essential that the EPA consider the precedential nature of this application during the assessment process. New Zealand cannot afford to permit damaging seabed mining in the hope of joining the apparent "mining boom" in natural resources. The Dutch sand mining industry leaves a lifeless desert in its wake and New Zealand does not need to follow along that path.

19. There is also no mention of the terms of the licence in respect of royalty income payable to the Crown. This is not just an environmental assessment made in a vacuum, rather a risk assessment that needs to import the positive side of the ledger. New Zealanders are being asked to take a huge environmental risk to the marine ecosystem, in return for what benefit?
20. Approximately 50 tonnes of material will be mined annually yielding around 10 percent iron ore. The remaining material, around 45 million tonnes of ‘tailings’, will be returned to the seabed via a pipe along with other discharges including, but not limited to brine, fine sediment and freshwater. It is inconceivable that seabed mining is benign; it is only a question of the size and nature of the disturbance, but there are few details in the papers provided.
  - Considering the technical papers the NZSFC considers it unduly risky to approve such a huge mining operation when there is no real data from an operating system.
21. There is faint, if any, consideration given to the cumulative effect of sediment loading from the proposed iron mining when combined with the high sediment loads running off from the land.
22. Also, we cannot ignore the vibrant nature of the South Taranaki Bight. It is a high-energy environment with a strong onshore drift. What will happen to the disposed tailings in 20 metres of water when a severe southwest storm comes out of the Southern Ocean? What effects will this have on local beaches and communities?
23. Where is the local or international data on mining the seabed in such a dynamic environment? Or is South Taranaki expected to be the guinea pig operation?
  - Given the high environmental risks **the NZSFC submits the EPA decline the application.**
24. **If the EPA grants the application** there must be an associated demand for controlling the terms of operation to mitigate the environmental effects, given the precedential nature of this application –
  - a. Tight environmental standards must be set as conditions of operation;
  - b. An intense monitoring programme must be established to ensure these standards are not breached;
  - c. Monitoring must include testing the chemical composition of sands being pumped to the surface, the sand as it reaches the seafloor, and sites 100m, 500m, 1km, 5km and 10km from the discharge point, and at test points along the coastline.
  - d. An ecological assessment of environment effects must be completed at a minimum of 6-monthly intervals, to update the data with real observations and measurements.
  - The EPA **must** be able to stop the mining if standards are breached.