National Policy Statement – Freshwater Management – Submission

Introduction

This submission is made by Birchfield Coal Mines Ltd (BCM). BCM is a family owned and operated coal mining company based on the West Coast of the South Island. BCM produces high quality West Coast coal for use in energy production throughout the South Island.

Customers include food processors, food growers, dairy factories, schools, hospitals, swimming pools and domestic heating customers.

Coal produced by BCM is also exported. BCM hold permits that contain high quality coking coal that will be used for steel making once extracted.

BCM are a large employer on the West Coast and support numerous other industries through contracting services, repairs and supplies.

Implications of Proposed National Policy Statement for Freshwater Management (NPS-FM) and Proposed National Environmental Standards for Freshwater (NES-FM)

The Proposed NPS-FM and NES-FM will have a significant impact on the mining and extractives industry.

This is a consequence of changing the activity classification of a number of activities relating to streams, waterways, wetlands and discharges, combined with a policy focus on maintaining and improving health and wellbeing of waterbodies and freshwater ecosystems.

Mining and mineral extraction only occurs where a mineral resource is found. In many cases, these areas are mountainous and are intersected by waterways and streams – both permanent and ephemeral.

The development of pits for extraction and subsequent overburden disposal requires some degree of infilling of stream beds, removal of riparian vegetation and diversion of water.

Water diversions include the diversion of mine water, stormwater water and clean water either into sediment retention ponds or around the mining activity.

Mining operations also require to be able to discharge fine sediment into streams and waterbodies – this is currently authorised via resource consent with the application of a reasonable mixing zone to avoid adverse effects on the receiving environment.

There does not appear to be a conclusive definition of infilling within the proposed document. Nor has there been any consideration of fine sediment discharges.

Overall, the Proposed NPS-FM and NES-FM will significantly affect the mining industries ability to continue to gain resource consents to operate.

There is no credible alternate source of heat energy for the South Island domestic market and without coal there will be a significant economic impact on key export industries currently supported by the mining industry.

The activities above need to be classified as permitted, controlled or discretionary (alongside nationally significant infrastructure), not non-complying.
BCM are currently involved with research projects focused on alternate uses for coal. These projects require continued access to New Zealand’s mineral resources – these documents will have significant implications on the ability to develop new technologies from within the existing minerals industry.

Other Submissions

We understand that the following organisations have also made submissions on this document:

- Straterra
- Bathurst Resources Ltd
- New Zealand Coal and Carbon

We support these submissions in their entirety.