

Submission No. 1

18 February 2021.



Director-General
Department of Conservation
Private Bag 701
Hokitika 7810
Attn: Lucy Croft, Permissions Advisor
permissionshokitika@doc.govt.nz

Cc: West Coast Conservation Board

Kia ora Lucy,

Application for an access arrangement by Kokiri Lime Company Limited

Federated Mountain Clubs (FMC) was founded in 1931 and advocates for New Zealand's backcountry and outdoor recreation on behalf of 22,000 members in 96 clubs. FMC has taken, and continues to take, a leading role in the establishment of protection and ongoing robust planning for much of New Zealand's public conservation land.

We would like to speak at the hearing.

FMC submits on the following points:

Access

The area in question is used by hunters, as the Sugar Loaf Road provides excellent access to the Sugar Loaf block. This public road is in fact the only way to reach the area. In general, mines on public conservation land require exclusive use due to health and safety requirements. The Kokiri Lime Company Limited (Kokiri) application contains no information on how recreational access would be maintained. As visitors to the Sugar Loaf would have to use a mining access road and would have to pass through the quarry site itself, it is likely that recreational access to the vast area between the Karangarua River and Saltwater Creek (16 square km) would be lost.

Soundscape

The quarry would regularly require blasting to loosen rock; blasting noise can travel in excess of 10km. The Copland Track is just 4.5km away. This is one of the most popular tramping tracks in the western South Island region, attracting both domestic and international visitors. High demand for the 31-bunk Welcome Flat Hut is testament to its popularity; the hut regularly reaches capacity. The tramp takes visitors through a highly unmodified area with natural quiet being a key drawcard. Helicopter landings are

not permitted in the area. It is likely that blasting will be clearly heard by those on the lower section of the Copland Track, degrading the natural soundscape and, for some, the experience as a whole. The application states that *“Rock Blasting (explosives) will only occur between the hours of 8.00am and 6.00pm, Monday – Saturday.”* (1.18.4 page 16). FMC questions its use of the word 'only'. In fact, a great deal of noise would interrupt the visitor experience, and would occur at the very time that trampers would be in the area.

Land classification and natural values

The area in question is within the Cook to Haast River Conservation Area. Stewardship land is provided for in the Conservation Act 1987 (the Act): *Every stewardship area shall so be managed that its natural and historic resources are protected* (Part 5 s25). Stewardship land was set aside in 1987 awaiting classification based on its values. In this case, the area contains high natural values including podocarp tree specimens in excess of 500 years old.

After a visit to the site, it is FMC’s opinion that the land in its current unmodified state could be a worthy addition to Westland Tai Poutini National Park. FMC believes that the reclassification process, now prioritized by the Minister of Conservation, Hon Kiritapu Allan, should take place before any decision on a quarry application can take place.

(We also note that the proposed activity is in tension with the Government’s policy of ‘no new mines on public conservation land’.)

The proposed activities would result in the loss of approximately 14 hectares of unmodified native forest habitat and many dozens of exceptionally large, old growth trees (>500 years old).

The area is part of a nationally significant ecological system and the landform could not be restored once the activity had occurred. As stated in the ecologist’s site visit memo for the newly applied-for 15ha, Page 6: *From my understanding there is no recovering of the natural landform post mining...* The activity would permanently alter a landform within Te Wāhipounamu - South West New Zealand World Heritage Area.

No form of mitigation would restore the landscape nor bring back the old growth forest. The mine could not go ahead in such a way as to protect the forest and landform. The proposed activity is clearly inconsistent with s25 of the Act.

Other locations for activity

The activities in this application can be undertaken outside of public conservation land. There are several existing rock quarries on private land in South Westland providing rock for protection works. For example, there is a large scale operation on private land in Whataroa which produces high grade rock for protection work. It has substantial reserves and is in an excellent location to supply both Fox Glacier and Franz Josef.

World Heritage Status

The Area is classified as a UNESCO World Heritage Site – Te Wāhipounamu South West New Zealand World Heritage Area – due to its internationally significant natural values, including pristine forests. When an area is given World Heritage status, the expectation is that these resources will remain protected. If they become reduced or lose their protection, World Heritage status can be lost.

The proposed activities are abrasive to the area's World Heritage status and in direct opposition to World Heritage obligations in the West Coast CMS which state that, *there is an obligation on the Department of Conservation to manage the World Heritage area in such a way that its integrity is preserved*. To do otherwise would tarnish New Zealand's reputation as a world leader in conservation.

Climate Change

FMC notes that the Climate Change Commission recently released its draft advice for 2021. The strategy of moving towards a low carbon economy relies heavily on using native forests to sequester carbon. In fact, it suggests expanding our native forests significantly through planting. The loss of 14 ha of old growth forest is a step in the wrong direction regarding New Zealand's carbon objectives. It is disappointing that DOC's significance assessment report does not consider the impacts of removal of the forest with respect to carbon sequestration.

FMC suggests that work is undertaken to consider the role this forest plays with regard to carbon sequestration and that any decision on this application provides for the best outcome with respect to the aims of the Climate Change Response (Zero Carbon) Amendment Act.

Sustainability

The current amount of short-term rock protection on the West Coast appears unsustainable. Projects such as shoring up the road to Franz Josef Glacier are estimated to have a life span of just a few years, offering only short-term solutions in a losing battle against flood events and erosion. A long-term strategic plan for rock protection and prioritisation for the region needs to be developed to ensure meaningful use of finite resources.

Many recent and current rock protection projects have been associated with extreme weather events, coastal erosion, and sea level rise; these issues are worsened by the effects of climate change. An important climate change mitigation strategy is storing carbon in forests. The loss of old growth forest if this venture were to proceed would be counterproductive in this respect and

inconsistent with the Government's direction regarding climate change mitigation and achieving carbon neutrality by 2050.

Conclusion

The activities applied for by Kokiri Lime are inconsistent with the Conservation Act 1987 and the West Coast CMS as well as detrimental to internationally recognized natural values and the retention of the area's UNESCO World Heritage status. They would also blight the outstanding quiet recreational experience of a popular nearby tramping track and reduce the area's scenic tourism values as the quarry would be clearly visible from the State Highway. Furthermore, if the Department of Conservation were to grant this access arrangement, it would be negligent in its duty to maintain and advocate for the protection of the area's World Heritage values.

We would be remiss not to also point out our concerns that the proposed activities are counterintuitive to the nation's current efforts toward achieving carbon neutrality by 2050.

FMC is disappointed that an application so clearly inconsistent with the Act and CMS has reached this point.

FMC recommends that the application be declined.

Yours sincerely,

Jan Finlayson
President, Federated Mountain Clubs

Submission No. 2

Attn: Lucy Croft, Permissions Advisor
Director-General
Department of Conservation
Private Bag 701
Hokitika 7810

Submission on the application for an access arrangement by Kokiri Lime Company Limited

I oppose the granting of this access arrangement.

This application was originally for 181ha, but DOC's own specialist ecologist stated that: *The 181ha area under consideration is part of a nationally important tract of intact indigenous forest on unmodified landforms of high conservation value. The forests of South Westland are particularly significant because they contain a high proportion of lowland podocarp dominated forests, which are significant fauna habitat. The Karangarua State Forest, of which the area is part of, was classified as high value by Coker and Imboden (1982), the seminal forest classification system of the time (outstanding was the highest quality). The values have become more important over time, as modification continues elsewhere.*

The application has now been reduced to 15ha. It appears strange that initially the company needed 181ha, but now only needs 15ha to be both economically viable, and have enough rock to quarry. Once they have destroyed this toe slope on the glacial moraine, it would be logical for them to apply for access to the adjacent rock, so they could continue their activity. As they would have already reduced the importance of this piece of land in terms of both forest cover and landform, they may well be granted further access. So you would have a situation of death by a thousand cuts.

The assessment by the ecologist would suggest that the whole area should be considered for addition to Westland Tai Poutini National Park, as it has such high natural values.

Even if you just consider this 15ha access application, there are strong reasons for it not to be granted.

1. This is stewardship land which is to be managed to protect its historic and natural values – the natural values are very high. The ecologist reports that it is effectively acting as a buffer between highly modified land and the larger continuous forested area. If this is removed, that buffer area will be shifted further back onto currently unmodified forest.
The landform itself will be permanently destroyed.
2. This is part of Te Wāhipounamu - South West New Zealand World Heritage Area. There is an obligation on DOC to manage the area to preserve its uniqueness. Permanently destroying some features, including landforms and mature trees does not do this.
3. Recreational access would be restricted into the area, you cannot have members of the public travelling through a quarry site. The noise from blasting would

OBJECTION OR SUBMISSION FORM
**Publicly notified application for leases,
licences, permits, or easements.**



Department of
Conservation
Te Papa Atawhai

New Zealand Government

Submission No. 3



A. Permission Application Number and Name of Applicant

87595-AA Kokiri Lime Company Limited

B. Name of Proposed Activity and Location(s)

Access arrangement at Karangarua, South Westland District for rock quarry purposes.

C.1 Objector or Submitter Information-

Submitter's name (list organisational name if submitting on behalf of a business, community group, etc.)	Royal Forest & Bird Protection Society Inc. (Forest & Bird)
Contact person and role of organisation	Nicky Snoyink
Email (Communication from DOC will be via email unless alternate contact requested)	[REDACTED]
Alternate contact for all DOC communication	Jen Miller [REDACTED]
Phone/Mobile	[REDACTED]
Postal Address and Post Code	[REDACTED] Christchurch [REDACTED]

I wish to **keep my contact details confidential**

Note: Your contact details will be not made public, but your name and organisation will be published. DOC will send you all submitter communications.



A. Permission Application Number and Name of Applicant

87595-AA Kokiri Lime Company Limited

B. Name of Proposed Activity and Location(s)

Access arrangement at Karangarua, South Westland District for rock quarry purposes.

C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Nicky Snoyink
Organisation	Forest & Bird
Date	19 February 2021

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

See attached written submission

My reasons for my objection or submission are:

See attached written submission

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

See attached written submission

G. Attachments

If you are using attachments to support your objection or submission clearly label each attachment, complete the table below and send in your attachments with this 'objection or submission form'.

Document title	Document format (e.g. Word, PDF, Excel, jpg etc.)	Description of attachment
F&B Submission to Access Arrangement 87595	PDF	Written submission

How do I submit my objection or submission?

Complete this form and email to permissionshokitika@doc.govt.nz You may also mail your objection and submission to: Director-General, c/o Department of Conservation, Attn: Lucy Croft, Private Bag 701 Hokitika 7810

Submission No. 3



19 February 2021

Director-General
Department of Conservation
Private Bag 701
Hokitika 7810

BY EMAIL: permissionshokitika@doc.govt.nz

Royal Forest and Bird Protection
Society of New Zealand Inc.

Christchurch
New Zealand

www.forestandbird.org.nz

Tēnā koe,

Re: Submission Access Arrangement 87595

1. Forest & Bird is Aotearoa New Zealand's largest and oldest conservation organisation. For almost a century we have advocated for the protection and preservation of New Zealand's native species and habitats, and more recently to halt its decline.
2. In November 2017, the Prime Minister announced there would be "no new mines on public conservation land." The reasons for this are obvious – our conservation land holds very high biodiversity values, and is important if we are to protect our biodiversity's resilience, respect our natural environment, and halt the decline of our ecosystems across the country. The forest sinks are also important places to sequester carbon. The imperative to protect them was made even clearer by the Climate Change Commission's report and recommendations.¹
3. Forest & Bird opposes this Access Arrangement application. However, we acknowledge and are acutely aware of the need for an appropriate rock source to provide resilience and protection for West Coast communities and especially for sites of cultural and spiritual significance including Te Tauraka Waka a Māui marae and associated lands at Bruce Bay, that are vulnerable to erosion.
4. Addressing this need should not come at such cost to nature. A thorough assessment of the alternatives is vital.
5. The application has been assessed as significant for public notification. However, in Forest & Bird's view there is insufficient information and independent technical reports for the general public to make an informed submission. This undermines the public notification process.

¹ <https://www.climatecommission.govt.nz/get-involved/our-advice-and-evidence>

6. The lack of expert information beyond that provided by the applicant and the Department of Conservation (DOC) creates a significant challenge for making an informed submission. On that basis alone, the application should be declined.
7. An independent geological report, to confirm the claim of no alternative sites or sources of rock would have been helpful. In Forest & Bird's view, the ecological reports provided by the Department of Conservation understate the significance of the ecological values that will be destroyed by this proposal and appears to have misinterpreted the meaning of representative in terms of assessing significance.²

"The application will result in the loss of approx. 14ha of natural native forest and many dozens of individual trees of great age (>500yrs). This 14ha represents a small proportion of similar forest in the Ecological District. Mining in this reduced, modified area is unlikely to significantly reduce the value of the wider area for nature conservation."
8. The existence of podocarp forest elsewhere in the ecological district does not reduce its significance and justify its removal. The type of insidious reduction represents a death by a thousand cuts for Aotearoa New Zealand's natural heritage.
9. Furthermore, neither an expert invertebrate survey nor a landscape impact assessment appears to have been provided to the public.
10. West Coast podocarp forest ecosystems have suffered severe loss and fragmentation. The removal of in-situ podocarp forest comprised of many dozens of >500-year-old trees will create a long-term irreversible adverse effect, not only by reduction of mature indigenous forest and loss of intact habitat for indigenous fauna but also through the loss of important genetic diversity.
11. Aotearoa New Zealand's podocarp forest ecosystems are found no other place on earth, and in South Westland its significance is internationally recognised by the United Nations Educational Scientific and Cultural Organisation (UNESCO).³
12. We do not consider this application consistent with West Coast Tai Poutini Conservation Management Strategy Outcomes, particularly for indigenous biodiversity nor do we consider it consistent with other statutory and non-statutory obligations to protect and maintain indigenous biodiversity.
13. For the reasons above, Forest & Bird requests that Access Arrangement 87595 be declined.

Forest & Bird wishes to be heard.

Thank you for the opportunity to submit.

² Department of Conservation guidelines for assessing significance of ecological values (2016). M. Davis., N.J Head, S.C Myers and S.H Moore.

³ Te Wāhipounamu - South West New Zealand World Heritage Area

Nāku noa, nā



Nicky Snoyink

Royal Forest and Bird Protection Society of New Zealand Inc.

Regional Conservation Manager Canterbury/West Coast