

02 April 2025

West Coast Regional Council and Westland District Council.
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Westland Mineral Sands Applications for Resource Consents under Section 96(1) of the Resource Management Act 1991

1. This is technical advice on an application from Westland Mineral Sands Co. Limited (WMSC) for the following Resource Consents (Discharge Permits; RC-2023-0133-01, RC-2023-0133-02, RC-2023-0133-03, RC-2023-0133-04, RC-2023-0133-05, RC-2023-0133-06 and RC-2023-0133-07; and Land Use consent; RC240013 to undertake heavy mineral mining and ancillary activities for the Mananui Sand Mine Project. The proposed mine footprint is located on approximately 112 hectares of private land. Ancillary activities include a proposed access from State Highway 6, associated infrastructure and processing facilities also situated on private land.
2. The following technical advice on the above applications has been compiled by the National Public Health Service (NPHS) Te Waipounamu, Health New Zealand – Te Whatu Ora. NPHS Te Waipounamu provides public health services across the South Island, including the West Coast.
3. NPHS Te Waipounamu recognises its responsibilities to improve, promote and protect the health of people and communities of Aotearoa New Zealand under the Pae Ora (Healthy Futures) Act 2022 and the Health Act 1956.
4. This technical advice sets out matters of interest and concern to NPHS Te Waipounamu, and the information provided, and decisions requested, are based on evidence about effects on public health and equity.
5. NPHS Te Waipounamu is neutral and neither supports nor opposes the WMSC applications, being only concerned to ensure conditions are imposed that will, as far as practicable, protect the health of people and communities and mitigate any adverse effects on public health.

Specific Comments

6. The following comments are specifically related to the parts of the consent applications that are relevant to safeguarding the health of residents living near the site, persons undertaking recreational activities near the site and those living, working and travelling on or near the transport routes from the site through Hokitika and Greymouth to the Port of Greymouth.
7. They cover potential environmental health issues, primarily those related to noise and dust emissions from mining and transport activities, including exposure to naturally occurring radioactive materials in the mineral sands and heavy mineral concentrate.
8. NPHS Te Waipounamu wishes to highlight the following matters that we consider have not been adequately addressed in the Assessment of Environmental Effects (AEE) and supplementary application papers.

Noise

9. The AEE appears to acknowledge that noise levels at the residential premises nearest the site will not always be fully compliant with the existing Westland District Plan or the proposed Te Tai O Poutini Plan.
10. This is a concern, as the provisions of both these plans are designed to mitigate adverse effects of environmental noise on people and communities. As such, any proposed activities that will not fully comply with these plans require very careful consideration and compelling reasons to depart from them.
11. The decision sought is the imposition of adequate controls to protect the health of people and communities as follows:
 - a. The proposed long daytime hours on all days (until 22.00 hours) do not provide adequate noise protection for nearby residents. Shorter daytime periods, intermediate evening periods and alternative weekend limits should be further considered.
 - b. Consideration of noise effects on the side of houses screened from road noise is also required, and of noise effects at locations further from the road (such as the walkway and reserve).
 - c. For the plant to operate continuously as planned, use of mains electricity power rather than local generators or diesel engines could significantly reduce potential noise effects. This noise avoidance/mitigation option should be considered and assessed.
 - d. Further assessment of, and management processes for, special audible characteristics is also required as these affect the subjective acceptability of noise.

- e. Further consideration of the imposition of curfews on activities at the site to ensure that the nearest residential receptors can reasonably enjoy weekends, evening and overnights free from additional environmental noise for the duration of the project.

Ancillary transport activities (Noise)

- 12. The AEE and supporting documents associated with the application provide a comprehensive analysis of activities relating to mineral sand mining but no detailed assessment relating to the transport route from the site through Hokitika and Greymouth to the Port of Greymouth.
- 13. The application, as described in the AEE, appears likely to increase heavy truck movements along the planned transport route. Further assessment of the impact of these transport movements on the noise environment and further consideration of proposed mitigation is required to fully assess the potential impacts on human health.
- 14. More specific information is needed as the application documents are not clear in terms of numbers of truck movements at specific times of the day and night and they do not contain any current analysis of the background noise environments along the planned transport route.
- 15. The decision sought is to impose adequate controls to protect the health of people and communities as follows:
 - a. Further consideration of the imposition of curfews on transport activities from the site to ensure that residential receptors living along the transport route can reasonably enjoy weekends, evening and overnights free from additional environmental noise for the duration of the project.
 - b. Further environmental noise analysis on background noise levels along the transport route and assessment of the human health impacts for those living alongside the transport route of the effects of the transport activities to and from the site.

Ancillary transport activities (heavy metal concentrate containing naturally occurring radioactive materials)

- 16. The AEE and supplementary application papers include a reasonably comprehensive assessment of the mining operation, and the process plant operations used to produce the heavy mineral concentrate. It appears that this is in the form of wet mineral sand and will not be liable to dust creation from being mined, processed and transported.
- 17. Heavy mineral concentrate is known to contain trace amounts of naturally occurring radioactive materials, which may pose health risks if not responsibly managed. NPHS Te Waipounamu is aware of concerns within the local community regarding this particular risk in relation to mining and transport of heavy mineral concentrate.

18. Paragraph 6.77 of the AEE states 'A report prepared by Hardie Pacific outlining the various radiation sampling methods conducted on site is included in Attachments S. The assessment indicates that the majority of material is captured in the Heavy Mineral Concentrate, which is removed from the site, however, also confirms that the Heavy Mineral Concentrate produced is well below the concentrations which would classify the material as radioactive, and therefore the Radiation Safety Act 2016 does not apply to the production/transportation of this material'.
19. The decision sought is to impose adequate controls to protect the health of people and communities as follows:
- a. Consultation with the Office of Radiation Safety of the Ministry of Health, as the authority with jurisdiction under the Radiation Safety Act 2016, should be carried out before consent is granted to ensure that the information in Attachment S is subject to expert review, and the proposed consent conditions are sufficient to protect public health.

NPHS Te Waipounamu does not wish to be heard in support of our technical advice. However, NPHS Te Waipounamu is willing to consider participation in any pre-hearing conferences or mediation.

Dated this 2nd of April 2025



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