

BEFORE THE OTAGO REGIONAL COUNCIL
AND
BEFORE THE WAITAKI DISTRICT COUNCIL
AND
BEFORE THE DUNEDIN CITY COUNCIL

ORC File No: RM16.138

IN THE MATTER **Of the Resource Management Act 1991**

AND

IN THE MATTER **Of Applications by Oceana Gold (New Zealand)**
Limited for various resource consents for the
Coronation North Mine Project, Macraes Flat

Evidence of Laurence Peter BAREA on behalf of the
Director-General of Conservation dated 21 October 2016

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DOC-2879177

INTRODUCTION

1. My name is Laurence Peter Barea. I hold both Bachelor of Science (1991) and Master of Science (1st Class honours) (1995) degrees from the University of Waikato and a PhD (2008) in Terrestrial Ecology from Charles Sturt University, NSW, Australia.
2. I took up my current role with the Department of Conservation (the Department) as Technical Advisor Ecology for Biodiversity Offsets in November 2012. Previously I was a senior environmental consultant with Golder Associates (NZ and Canada) Limited, and prior to that I was an Ecologist and Biodiversity Technical Support Supervisor for the Waikato Conservancy of the Department from October 2007 – February 2010. Between 2001 and 2004 I worked as a consulting wildlife biologist in Boise, Idaho on a range of development projects across the Pacific Northwest of the United States of America before moving to Australia in 2004 to undertake my Doctoral research. Between 1996 and 1998 I worked for the Department as a wetland and threatened species ecologist.
3. I have published nine scientific papers in peer reviewed literature and am co-author on another paper currently in press on biodiversity offsetting. I am a member of the New Zealand Ecological Society.
4. I have been an expert witness on biodiversity offsetting in relation to the previous Coronation Mine Project, Hauāuru mā Raki (HMR) Wind Farm, the Hurunui Water Project, the proposed Auckland Unitary Plan, and the proposed South Taranaki, Buller, Thames/Coromandel, Kapiti and Queenstown Lakes District Plans.
5. My current role in the Department involves implementation of the New Zealand government's *Guidance on Good Practice Biodiversity Offsetting in New Zealand* (the NZ Guidance). I provide technical advice on biodiversity offsets and their development and assessment in accordance with the NZ Guidance.
6. I am presenting this evidence on behalf of the Director General of Conservation addressing impact management and environmental compensation for the Coronation North mine proposal made by Oceana Gold Limited (OGL). I visited the proposed mine site on July 12, 2016.

CODE OF CONDUCT

7. I confirm that I have read the code of conduct for expert witnesses as contained in the Environment Court's Practice Note 2014. I have complied with the practice note when preparing my written statement of evidence, and will do so when I give oral evidence before the Court.
8. The data, information, facts, and assumptions I have considered in forming my opinions are set out in my evidence to follow. The reasons for the opinions expressed are also set out in the evidence to follow.
9. Unless I state otherwise, this evidence is within my sphere of expertise and I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

SCOPE

10. I have been asked to provide evidence in relation to the management of adverse effects to the environment. Specifically, I address the following matters:
 - a) Managing Adverse Effects to the Environment and the NZ Guidance
 - b) Biodiversity Offsets and other forms of Effects Management
 - c) The Mitigation Hierarchy
 - d) Additionality and Long Term Outcomes
 - e) Proposed Otago Regional Policy Statement 2016
 - f) Comments on the Applicant's Adverse Effects Management Approach
 - i. Coronation North Waste Rock Stack
 - ii. Island Block and Highlay Hill Covenants
 - iii. Lizard and Freshwater Biodiversity Management
 - iv. Threatened and Rare Plants
 - v. Coal Creek Dam and Reservoir
 - g) Conclusion

EXECUTIVE SUMMARY

11. Biodiversity offsets are measurable conservation outcomes compensating for significant residual adverse effects of development projects after appropriate prevention and mitigation measures have been taken. Their goal is to achieve no

net loss and preferably a net gain of biodiversity on the ground. The New Zealand government developed guidance on good practice biodiversity offsetting drawing on internationally accepted practice. Other forms of environmental compensation seek to achieve goals that do not necessarily achieve no net loss.

12. OceanaGold Ltd has applied to operate the Coronation North Gold Mine and has offered a set of consent conditions to address the adverse environmental effects of the project. I have reviewed these conditions and am partially supportive. However, I have remaining concerns regarding their adequacy. In particular I am concerned about the following;
 - a) The design of the Coronation North Waste Rock Stack (as revised) does not appear to have taken into account its overlying 108ha of Trimbells Gully, an area of significant habitat for flora and fauna previously recommended for protection in the Protected Natural Area Programme.
 - b) The conditions do not meet Policy 5.4.6 of the proposed Otago Regional Policy Statement.
 - c) Lack of additionality associated with covenants at Highlay Hill and Island Block/Deepdell Creek and ongoing management of pests.
 - d) Shortfalls in conditions addressing threatened plants, lizards and freshwater habitats.
 - e) The lack of a full set of conditions providing environmental compensation for the values lost to the Coal Creek Dam and Reservoir leaving an unacceptable level of uncertainty into the design and implementation of the project.
13. Failure to address these concerns will in my opinion risk inappropriate ecological outcomes and unacceptable biodiversity loss.

MANAGING ADVERSE EFFECTS TO THE ENVIRONMENT AND THE NZ GUIDANCE

14. The Business and Biodiversity Offsets Programme (BBOP; <http://bbop.forest-trends.org/>) is an international collaboration of more than 80 organizations and individuals including companies, financial institutions, government agencies and civil society organizations. New Zealand has been a key contributor to the

programme with members from the Department of Conservation, extractive industry and legal profession contributing to the work. The members have produced guidance on biodiversity offsetting to achieve no net loss or a net gain in biodiversity.

15. The BBOP's vision and expectation is that biodiversity offsets will become a standard part of business practice for those companies undertaking activities with a significant residual effect on biodiversity after avoiding, minimising and remedying adverse effects; and that the routine mainstreaming of biodiversity offsets into development practice will result in long-term and globally significant conservation outcomes.

16. Biodiversity offsetting refers to a process that seeks to counter-balance the unavoidable effects of activities on biodiversity by enhancing the state of biodiversity at a site other than the affected site and is defined as:

Measurable conservation outcomes resulting from actions designed to compensate for significant residual adverse biodiversity impacts arising from project development after appropriate prevention and mitigation measures have been taken. The goal of biodiversity offsets is to achieve no net loss and preferably a net gain of biodiversity on the ground.

17. Thus, biodiversity offsets are differentiated from other forms of effects management, including environmental compensation, i.e. actions intended to address residual adverse environmental effects not intended to achieve no net loss, by requiring three essential components:

- a) Explicit measurement and balancing of biodiversity predicted to be lost and gained;
- b) A mitigation hierarchy to be followed, i.e. offsetting significant residual effects after appropriate avoidance, minimisation and on-site rehabilitation activities have taken place; and
- c) A goal of no net loss and, preferably, a net gain of biodiversity to be reasonably demonstrated and then achieved on the ground.

18. In response to an increasing number of proposals involving offsets, where consistency of approach and a standard were lacking, the Department led an initiative to develop the NZ Guidance between 2009 and 2014. The intention was

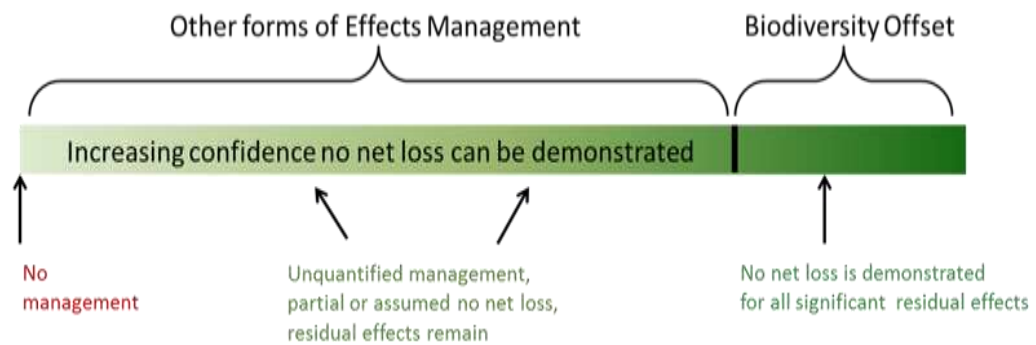
to ensure that solutions addressing residual effects are ecologically sound and demonstrably result in no net loss or a net gain. The NZ Guidance is contextually related to Goal 3 of the New Zealand Biodiversity Strategy (2000), which is to halt the decline in New Zealand's indigenous biodiversity.

19. The NZ Guidance is New Zealand's implementation of BBOP's international work. It was developed under the auspices of the Department's Biodiversity Offsetting Programme, with participation of the Ministry for Business, Innovation and Employment, Ministry for the Environment, Land Information New Zealand, and the Ministry for Primary Industries.
20. The New Zealand Programme has drawn from the work of the BBOP, including adoption of the ten principles, to the extent that the NZ Guidance is essentially the New Zealand embodiment of that work.
21. The NZ Guidance was formally launched by the Minister of Conservation on 7 August 2014. Although the NZ Guidance is not a statutory document it is a valuable tool for the design and assessment of ecologically sound management of effects and it provides an overview of the key steps necessary to demonstrate good practice when choosing to develop and implement a biodiversity offset in New Zealand.

Biodiversity Offsetting and other forms of Effects Management

22. In any activity there is usually a range of measures presented by the applicant to address adverse effects on the environment. It is usual that a mixture of solutions will be tabled: from avoiding, remedying and mitigating certain adverse effects through to actions addressing the loss of residual ecological values which cannot be avoided, remedied and mitigated.
23. The range of management options for these residual effects exists along a continuum representing increasing confidence that no net loss or a net gain can be demonstrated in support of its practical achievement on the ground. No net loss refers to the point where gains in biodiversity values accruing from management match those lost to development.
24. The concept of like for like is inseparably linked to no net loss. This is because as the degree of dissimilarity between the biodiversity being lost and gained increases, the more difficult it becomes to replace all the components lost because they may

not exist at the offset site. This means that those gains must involve the exchange of similar, or like for like, biodiversity values if no net loss is to be achieved. These concepts are illustrated in Figure 1.



25. At the extreme left of the figure, and under little or no investment in effects management, there is low confidence that no net loss can be demonstrated. With increased investment in identifying adverse effects and management options, outcomes improve, but biodiversity losses and gains may remain un-quantified (how much of what has been lost and gained?), different types of biodiversity (i.e., like for unlike) are exchanged for those lost (e.g., forest for tussock ecosystem loss), and residual effects often remain. A biodiversity offset is indicated at the point along the spectrum where no net loss or a net gain is demonstrated to be achievable on the ground.
26. It is common for developers to offer environmental compensation, sometimes presented as mitigation, as a means of addressing the adverse effects of their proposal. Environmental compensation often comprises a range of offerings, from financial payments and/or specific management actions aimed at improving or protecting habitats or species populations, or both. A critical difference between environmental compensation and biodiversity offsets is that compensation is not designed to demonstrate that no net loss or a net gain in biodiversity is achievable. Thus, the outcomes of compensation differ from those of biodiversity offsetting and it is important for decision makers to understand this difference.
27. In my opinion the NZ Guidance can be usefully applied to the design of good practice environmental compensation in cases, such as the one before the panel, where a biodiversity offset is not offered as a response to residual adverse environmental effects, but only after the mitigation hierarchy has been applied.

The Mitigation Hierarchy

28. The mitigation hierarchy is an integral part of biodiversity offsetting and good practice adverse effects management. It consists first of avoidance, then minimisation, which can be interpreted as partial avoidance where total avoidance is not possible (also being analogous to mitigation), then on-site rehabilitation, then, as a final step, offsetting or compensation.
29. The mitigation hierarchy has broad global support as good practice across industry, including extractive industries, as shown by its adoption in policy and guidance by the International Finance Corporation (<https://www.ifc.org/>), a member of the World Bank and major funder of mining projects and the Cross Sector Biodiversity Initiative (<http://www.csbi.org.uk/tools-and-guidance/mitigation-hierarchy/>), to which the International Council for Minerals and Mining (<http://www.icmm.com/en-gb>) is a partner. The fundamental importance of the mitigation hierarchy is reflected in its position as Principle 1 of the BBOP offsets guidance and within the New Zealand Guidance.
30. In development scenarios, such as mining a fixed ore body where total avoidance of ecological features is often not possible, minimising adverse effects by careful ecologically sensitive refinements to the location of less-spatially-restricted elements (e.g. waste rock stacks) can be a critical component of ensuring that adverse effects are as small as practicable. This can translate to reduced adverse effects and more cost effective environmental compensation for residual adverse effects. However, for such compensation to be ecologically robust, it must provide something new.

Additionality and Long Term Outcomes

31. Another fundamental principle of biodiversity offsetting or environmental compensation is that of ensuring that the gains accrued through compensation are additional to what would have occurred without the project. This means that placing a covenant over an ecosystem that is not under foreseeable threat of a nature and scale commensurate with the development proposal, is limited in its provision of anything new.
32. It is important that gains offered by environmental compensation are matched to the time scale over which the adverse effects of the project will be realised. This is reflected in international and the NZ Guidance which states that offset outcomes

must last at least as long as the project's impacts and preferably in perpetuity. In my opinion, this should also apply to robust environmental compensation.

Proposed Otago Regional Policy Statement 2016

33. Policy 5.4.6 of the proposed Otago Regional Policy Statement (proposed ORPS) provides for the consideration of biodiversity offsetting for indigenous biological diversity. I acknowledge that the proposed ORPS is currently not operative and the weight that it can be given is discussed by Mr Familton.

Policy 5.4.6 Offsetting for indigenous biological diversity

Consider the offsetting of indigenous biological diversity, when:

- a) Adverse effects of activities cannot be avoided, remedied or mitigated;
 - b) The offset achieves no net loss and preferably a net gain in indigenous biological diversity;
 - c) The offset ensures there is no loss of rare or vulnerable species;
 - d) The offset is undertaken close to the location of development, where this will result in the best ecological outcome;
 - e) The offset is applied so that the ecological values being achieved are the same or similar to those being lost;
 - f) The positive ecological outcomes of the offset last at least as long as the impact of the activity.
34. Although the conditions proposed by OGL contain elements of approaches often used in biodiversity offsetting e.g. protective covenanting, I acknowledge that they are not framed as a biodiversity offset. With respect to Policy 5.4.6 in the proposed ORPS, in my opinion the proposed conditions are inconsistent with points, a)–c) above and only partially meet points e) and f).
35. Point a) is not met because, as I explain below, the design of the Coronation Waste Rock Stack has not minimised adverse effects to Trimbells Gully Recommended Area for Protection (RAP), rather the approach jumps straight to compensation. In addition, the options for managing water quality that could lead to an alternative to constructing the Coal Creek Dam and associated reservoir that would lead to avoidance of biodiversity loss, have not been fully explored in the application.

36. Points b) and c) are not met because the goal of no net loss or a net gain has not been demonstrated and there are losses of many, possibly thousands in the case of lizards, of rare or vulnerable species.
37. The proposed Highlay Hill covenant partially meets point e) at a vegetation community level but in the absence of detailed survey and comparison with values lost, the degree of similarity remains known. In the absence of ongoing pest control and maintenance of trout barriers commensurate with the timeframe over which adverse effects remain, point f) is not met. In saying this, I draw attention to the fact the adverse effects of the applications last much longer than the life of a consent and its associated conditions.
38. My conclusion with respect to Policy 5.4.6 in the proposed ORPS is that the adverse effects management approach taken by OGL is not a biodiversity offset, but rather a form of environmental compensation. I make comment on the content of this compensation in the following section of my evidence.

COMMENTS ON THE APPLICANT'S ADVERSE EFFECTS MANAGEMENT APPROACH

39. The applicant Oceana Gold Limited (OGL) has offered a set of conditions to address the adverse environmental effects of its activities under consideration and are presented in the evidence of Ms Debbie Clarke. I am generally supportive of the conditions in an environmental compensation framework. However, I have some remaining concerns which I discuss below.

Coronation North Waste Rock Stack

40. I commend OGL when Ms Clarke states in paragraph 8 of her evidence that "OceanaGold is genuinely committed to environmental management....". A first step in good environmental management is application of the mitigation hierarchy. I acknowledge that the RMA does not anticipate a hierarchy when it requires, in section 5(2)(c), avoiding, remedying, or mitigating any adverse effects of activities on the environment. However, as I describe above it is internationally recognised as best practice to demonstrate first avoiding and then minimising adverse effects *before* remedying, or mitigating adverse effects followed by addressing any residual adverse effects. Doing so is one way to demonstrate a commitment to

environmental management. Unfortunately, to my knowledge OGL has not demonstrated this.

41. Appendix 06a to the AEE states that all the vegetation beneath the Coronation North Waste Rock Stack will be buried, including habitat for, and populations of threatened and rare plant and lizard species. The area affected by the rock stack is described in the AEE as being a maximum potential area of 230 ha. This in my opinion is a substantial adverse effect.
42. In his evidence Brian Rance refers to the Coronation North Waste Rock Stack occupying 108ha (19%) of Trimbells Gully RAP (564ha) which he considers to be regionally significant. It is my opinion that, with respect to the placement of the Coronation North Waste Rock Stack over Trimbells Gully RAP, OGL has not fully applied best practice, internationally accepted in the mining industry, to first avoid or minimise adverse ecological effects prior to offering offsets or other forms of effects management, such as the environmental compensation offered. This means that the adverse effects on the environment, including threatened, at risk and rare species and ecosystems are greater than they could have been and despite the propose covenants, there remains a reduction in regionally significant tussock grassland and associated flora and fauna.
43. In addition, as Brian Rance states in his evidence, there appears to be no attempt to avoid the high concentrations of threatened plants located within the tributary of Trimbells Gully Creek and the Coal Creek dam and reservoir. These areas are also occupied by rare or threatened indigenous lizards, avifauna and invertebrates.
44. Accordingly, and in my opinion, for the ecological outcomes of this application to be improved, I recommend that OGL conduct a project design reshaping exercise to avoid placing the Coronation North Waste Rock Stack over the Trimbells Gully RAP. I note that the audit of OGL's ecological work prepared by Wildland Consultants refers to an alternative waste rock stack design which was rejected by OGL, based the current design being most cost effective, in favour of the current more ecologically damaging design. To my knowledge, OGL have not demonstrated that any additional cost involved in avoiding the permanent loss of biodiversity in the Trimbells Gully RAP would render the project nonviable.

45. In the absence of a redesign process the permanent loss of significant ecological values is a matter that in my opinion should be transparently and explicitly acknowledged and its appropriateness considered in the decision making process.

Island Block and Highlay Hill Covenants

46. Protective covenants are one method of offsetting or compensating for adverse effects to the environment. They are most appropriate when they provide gains that match, in a like for like manner, the values lost and the gains are long lasting and additional to what would have occurred under status quo.
47. I support the establishment of a covenant over Highlay Hill and Island Block (Deepdell Creek) including the additional areas outlined in Brian Rance's evidence. However, I would like to draw the panel's attention to the fact that limited additionality is gained through the establishment of both covenants, due to the near absence of significant threats to ecological values in the foreseeable future. Lack of additionality is an issue also discussed by Ms Adams with respect to protective mechanisms to compensate for the total loss of lizard habitat within the project footprint. Limited additionality is also discussed by Brian Rance with respect to the removal of the currently light grazing levels. This means that the establishment of both covenants does not fully compensate for the permanent biodiversity losses associated with the Coronation North Mine project.
48. For example, and as outlined in Brian Rance's evidence, the proposed Highlay Hill covenant is located at a higher elevation than the impact site which limits its use for agriculture. Although the proposed covenant would contains 19% of Trimbells Gully RAP, this is less than the 25% lost to the waste rock stack. Further, it is not at risk from gold mining due to its geology comprising basalt rather than potentially gold bearing schist.
49. OGL's overall approach to ecological protection avoids protecting any land with geology that may contain gold, including the remaining area of Trimbells Gully RAP. This limits the ability for a covenant to provide benefits that are additional to what would have occurred in the absence of the mine and eliminates any possibility to explicitly link biodiversity protection from the mining activities that cause its loss.

50. The proposed Island Block covenant site is also not at risk from mining and due to its steep topography is at limited risk from grazing, except for the margins which would benefit from the proposed fencing. However, the existence of few threats other than pests means that the site is likely to persist into the future regardless of consenting and land use practice in the wider landscape.
51. The existing threats to the ecological values of the proposed Island Block covenant are associated with the presence of pests; both weeds competing with native plants and predators which are likely to be suppressing the species of lizard, their populations and other indigenous flora and fauna. Ongoing pest management would provide additional benefits but is not being offered by OGL. However, condition 15.5 presented in Ms Clarke's evidence, excludes pest control beyond the felling of pine trees specified in Condition 15.4, when it states that the obligations of the covenant shall be limited to maintaining fencing and ensuring the covenanted land is not used for farming or mining purposes. I note that its use for mining is limited by the absence of gold bearing geology rather than by any will to forego resource to protect the environment.
52. In my opinion the absence of any pest control limits the long term benefits of establishing a covenant, including providing additionality. In my opinion, both covenants should receive ongoing targeted pest control to increase the level ecological gain so that it is additional to the status quo and is long lasting.

Lizard and Freshwater Biodiversity Management

53. OGL propose to provide a sum of \$30,000 over 5 years to support a researcher, MSc or PhD to conduct lizard research and contribute to habitat creation based on that research. I support this concept but note and support Ms Adams concern about the quantum of the sum. I also recommend the removal of reference to "over 5 years" to retain maximum flexibility of use and to provide for varying research costs over different years rather than potentially splitting the sum equally over 5 years which could substantially limit the research that could be undertaken.
54. Ms Adams has similar concerns to myself regarding the ability of OGL's proposed covenants to provide anything additional above the status quo for lizards with respect to their lost habitat. She also highlights the lack of evidence that creating boulder fields results in suitable habitat and increased populations across a range of lizard species. It must be considered by the panel that, in the event that the boulder

piles proposed by OGL are also unsuccessful, this project results in the permanent loss of a substantial amount of significant lizard habitat and lizards within the Ecological District.

55. I am concerned that OGL has not proposed any measures to address the 4.4 km of linear stream channel habitat lost to the project as stated by Dr Ryder at paragraph 74 in his evidence. An approach that focusses on trout predation of Galaxiids and crayfish and ignores the remaining freshwater biodiversity, as proposed by OGL, is one that accepts biodiversity loss. In my opinion this needs to be taken into account in the decision making process.
56. Proposed condition 15.9(e) in Ms Clarke's evidence relates to the records of monitoring lizard colonisation and occupancy of habitat created under condition 15.9. It required the consent holder to provide records of all monitoring to the Consent Authority on request. In my opinion all monitoring records should also be provided to the Department of Conservation upon request so that new information on the success of habitat creation for lizards is more usefully disseminated.

Threatened and Rare Plants

57. I support OGL's proposal to collect seeds, cuttings, plants or other cultivating material of threatened plants in Condition 15.6(a) of Ms Clarke's evidence and to plant out the cultivated plants in suitable locations that have been identified in consultation with the Department of Conservation.
58. I have one concern regarding the quantity of individuals of each species planted. Condition 15.6(b) of Ms Clarke's evidence refers to planting 20 individuals of each species and is followed by condition 15.6(d) which requires monitoring the success of all plantings for three years following planting. It is well recognised in the restoration literature that not all individual plants survive once planted out and survival rates differ across species and sites. This issue is also discussed in the audit of OGL's environmental work contained in the Dunedin City Council and Waitaki District Council S42a Report. I am concerned that as currently worded, condition 15.7 can be met with a scenario of 3 years of post-planting monitoring showing that all planted individuals failed to establish.
59. In my opinion the condition should be reworded to reflect a performance target of 20 individuals of each species listed in condition 15.6(a) surviving to the point an

experienced independent botanist considers them to be established, with follow up propagation and managed plantings to replace those that fail, so that the target of 20 individuals of each species is met. I also support Brian Rance's opinion that the sites where the plants are planted should be legally protected, fenced and that weeds and any other threats are managed so that the establishment of the plants is not compromised.

60. In support of the achievement and transparent communication of having met the condition, I am of the view that condition 15.6(d) should explicitly require the reporting of monitoring results with a copy to be provided to the Department of Conservation.

Coal Creek Dam and Reservoir

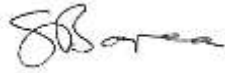
61. I have concerns regarding the approach to the adverse effects associated with the construction of the Coal Creek Dam and associated reservoir. While I support the establishment of a \$40,000 fund to build and maintain 2 trout barriers within the Mare Burn catchment, the overall management approach and any gains that may be derived is left to uncertainty. This is because, other than the above mentioned fund, OGL does not propose any conditions to compensate for the adverse effects of the dam and reservoir, because the dam may not be needed.
62. In my opinion a full set of conditions providing environmental compensation for the values lost to the dam and reservoir, including the streams shown in the evidence of Dr Ryder (Figure 2), should have been developed as part of this application with their requirement contingent on the dam being constructed. The footprint of the dam and reservoir is known and I see no reason why the ecological impacts cannot be calculated now and appropriate conditions put in place should the dam be built.
63. In my opinion, to leave this to a future process introduces an unacceptable level of uncertainty into the design and implementation of the project which risks inappropriate ecological outcomes and unacceptable biodiversity loss.

CONCLUSION

64. Granting consent to the Coronation North Mine will result in the permanent loss of significant habitats for indigenous species. I am concerned with the design of the

Coronation North Mine project and gaps in the conditions offered to compensate for its adverse environmental effects. These include limited attempts to avoid significant indigenous flora and habitats of indigenous fauna to measures that do not provide any or sufficient additionality, long term benefit to adequately compensate for the adverse effects of the project.

65. In the absence of these being addressed it is my opinion that a decision to grant a resource consent will result in uncompensated permanent loss of significant indigenous flora and habitats for indigenous fauna which in my view must be taken into account in decision making process.



Laurence Barea

[October 21, 2016]