

# Proposed Coastal Plan for Taranaki, 2018

## Submission by Climate Justice Taranaki Inc., 27 April 2018

### Introduction

1. Climate Justice Taranaki (CJT)<sup>1</sup> welcome the opportunity to provide the Taranaki Regional Council with comments on the Proposed Coastal Plan for Taranaki. We are a community group of residents from in and around Taranaki who are concerned about climate change, its root causes and the social injustice associated with it. Our core members have background in environmental science and marine ecology. We have been an incorporated society since 2015.
2. CJT submitted on the Draft Coastal Plan for Taranaki in November 2016<sup>2</sup>. A few of our comments were addressed in the Proposed Plan but many remain outstanding, as reflected in this current submission.

### Mana whenua

3. It is our understanding that Ngāti Maru has a mandate to negotiate with the Crown already. This needs to be updated in the plan (section 1.6). We note that Ngāti Maru is not included in Schedule 5B (Sites of significance to Māori). We urge the Council to work with Ngāti Maru when developing and implementing the plan.
4. Many hapū and iwi still oppose Crown authority over land and sea. The Foreshore and Seabed Act 2004, which extinguished customary Māori property rights to the coastal areas, and the subsequent Marine and Coastal Area (Takutai Moana) Act 2011, are recent examples of legislation that demonstrate the on-going debate as to who controls the coast and sea. It is our understanding that all iwi of Taranaki made applications in the High Court for legal recognition of their customary rights in te takutai moana (the marine and coastal area). These applications were due one year ago, on 3rd April 2017. Approximately 380 applications for Crown engagement were received from across Aotearoa. The Taranaki applications can be seen on the Ministry of Justice website<sup>3</sup>.

### Coastal Management

#### Appropriate use and development

5. CJT suggest updating the paragraph “*Appropriate use and development*” (p.13 of plan) to reflect the central government’s recent announcement<sup>4,5</sup> of no new offshore (EEZ and territorial waters) oil and gas exploration permits and restricting new permits to only onshore Taranaki over the next three years. While Taranaki has been “*one of the most important mineral producing regions...*” the government has signalled an end to further exploration and a beginning to transition away from fossil fuels.
6. A new Westpac NZ research report<sup>6</sup> showed that “*NZ can decarbonise towards a two-degree target while achieving economic growth*” and an early and smooth transition “*would create \$30 billion more GDP through to 2050 than the shock scenario.*” The Council of Trade Unions<sup>7</sup> including E tū<sup>8</sup> and South Taranaki iwi Ngāti Ruanui<sup>9</sup> have all openly announced their readiness to start a just transition to low carbon economy.

#### Coastal hazards and climate change

7. There is no doubt that climate change and sea level rise are heightening the risk of coastal hazards<sup>10,11</sup>. We ask that the statement be strengthened to “*The risk of, or vulnerability to, coastal*

hazards ~~may~~ increase over time due to climate change and sea level rise” (p.15). Climate change has already been identified as the cause of a 379 percent increase in sewage overflows<sup>12</sup> last year, as ageing infrastructure were unable to cope with record rains, threatening coastal water quality. In terms of coastal hazards, it is crucial to be kept up-to-date and flexible in terms of vulnerability assessments and management, because extreme events are occurring more frequently and intensely, as a result of climate disruption. What was previously considered a 1-in-500-year event is becoming a 1-in-100-year event, a 1-in-20-year event, and could eventually become the norm<sup>13,14</sup>.

8. A recent Ministry for the Environment report titled Adapting to Climate Change (MfE, 2017)<sup>15</sup> pointed out, “Given the long lifetime of infrastructure, it is important that climate change adaptation is factored into infrastructure decisions now... However, overall there is limited evidence of proactive action that reduces medium and long-term risks... In the majority of cases, councils do not have a plan for how to go about climate change adaptation...”

## **Policies**

### **Integrated management**

9. CJT fully support the emphasis on integrated management. We suggest expanding Policy 2(g) to include working collaboratively with government departments and authorities (e.g. EPA) to avoid, mitigate and manage any potential impacts from activities proposed/conducted in the Exclusive Economic Zone (e.g. seabed and petroleum mining), on Taranaki’s coastal environment.

## **Regional Rules**

### **Petroleum dispersant use**

10. Rule 4: As stated in our 2016 submission on the Draft Coastal Plan, we do not support the use of petroleum dispersant in any of the Coastal Management Areas (CMAs) and certainly not as a Permitted activity. Two of the dispersants that have been approved for use by Maritime NZ<sup>16</sup>, Corexit 9500 and Corexit 9527, are extremely toxic<sup>17</sup> to humans and the environment, and even more toxic when combined with crude oil. We submit that the use of the above-mentioned and other toxic petroleum dispersants be Prohibited in all CMAs. The use of non-toxic dispersants may be Discretionary.

### **Untreated human sewage discharges**

11. Rule 5: We strongly support that any untreated human sewage discharges be Prohibited in all CMAs.

### **Wastewater treatment plant discharges**

12. Rule 6: We are strongly opposed to allowing existing wastewater discharge that contains human sewage into any CMA, after its consent expires. We submit that once existing consents expire, the activity be Prohibited in all CMAs, considering its impact on the environment, on Maori rights and interest, the operational problems associated with such facilities, the duration of some existing discharge consents and advancement in wastewater treatment technology.
13. Our 2016 submission gave clear explanations to our argument on the subject of wastewater discharge, based on the lessons learnt from Waitara. Moreover, the risk of Norovirus<sup>18</sup> outbreaks through sewage-contaminated produce is real, as shown by the presence of Norovirus in shellfish collected near the marine outfall in Hawera in August 2017<sup>19</sup>. While the NPDC Wastewater Treatment Plant upgrade in recent years has significantly reduced the levels of GI and GII Norovirus in the plant effluent, low levels of Norovirus GII were detected in mussels collected from the Waiwhakaiho Reef during May 2017<sup>20</sup>. Crucially, mussels and other filter feeding molluscs are

efficient at concentrating Norovirus which can be retained in their flesh for up to 8-10 weeks. Only low concentrations of Norovirus are required to pose a high risk of infection in humans<sup>21</sup>.

14. Rules 7 & 8: We are strongly opposed to allowing new wastewater discharge that contains human sewage (treated or untreated) into any CMA. We submit that all new wastewater discharge containing human sewage be Prohibited in all CMA.

### **Sampling and cleaning biofouling**

15. Rule 10: We support that any discharges from biofoul cleaning into all CMAs except the Port, be Non-complying.

### **Seismic surveying and bathymetric testing**

16. Rule 12: We are strongly opposed to further petroleum prospecting and exploration. We submit that all seismic surveying for petroleum in any CMA be Prohibited because of the need to stop any further fossil fuel exploration and extraction in order to minimize climate disruption and to avoid harm to marine ecosystems and threatened species. On 27<sup>th</sup> February 2018, following our complaint to the Advertising Standards Authority<sup>22</sup> re PEPANZ's [seismicsurvey.co.nz](http://seismicsurvey.co.nz) website, PEPANZ revised its claims. Our complaint highlighted the harm from seismic surveys on marine ecological communities and on marine mammal species. Currently, offshore seismic survey activities are poorly regulated and renowned marine scientists, notably Prof Liz Slooten and Dr. Leigh Torres, have both criticized the effectiveness of the Code of Conduct developed by the Department of Conservation. A petition<sup>23</sup>, demanding a halt to all seismic testing in Taranaki Moana has gathered almost 12,000 signatures. On 30<sup>th</sup> November 2017, the Iwi Chairs Forum, involving all of the Taranaki iwi, unanimously passed a resolution, opposing all seismic testing and oil exploration across all NZ waters<sup>24</sup>.

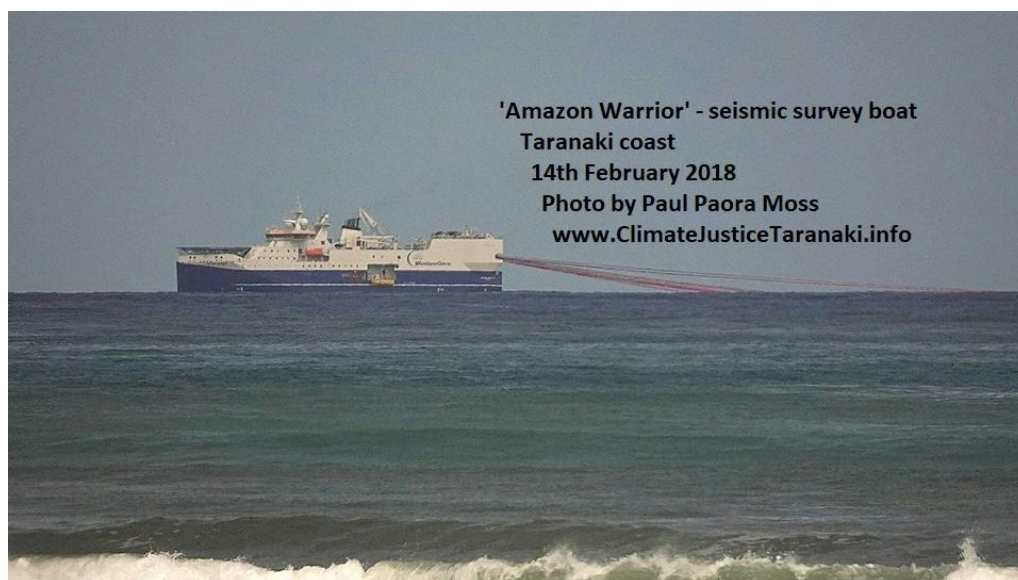


Photo: Seismic survey vessel 'Amazon Warrior', taken from Te Ikaroa, near Cape Egmont, on 14th February 2018, by Paul Paora Moss.

### **Other discharges to water or land not provided for in Rules 1 to 12**

17. Rules 13 & 14: We are very concerned about these two 'catch-all' rules and seek clarifications and examples of the types of contaminants that fall under these. Are they designed to capture contaminant discharge from industrial facilities such as Fonterra Whareroa and Methanex plants?

18. Fonterra Whareroa holds a consent<sup>25</sup> to discharge up to 40,000 cubic metres/day of dairy factory wastewater via a marine outfall, shared by South Taranaki District Council, for the discharge of municipal wastes including meat processing wastes. In 2014-2015, seven unauthorised incidents occurred, resulting in consent breaches. In 2015-2016, three incidents were recorded and resulted in two infringement notices being issued<sup>26</sup>. Methanex Motunui Ltd holds a consent (3400-2)<sup>27</sup> to discharge up to 12,096 cubic metres per day of effluent, containing hydrocarbons, methanol, 13 different treatment chemicals (including 600 kg of the coagulant Klaraid PC 1190P, 400 kg of Cortrol OS7780, 300 kg of Inhibitor AZ8104, 300 kg of Continuum AEC3109 and 20 kg of Spectrus CT1300, etc) and other contaminants into the Tasman Sea via the Waitara marine outfall. Cortrol OS7780<sup>28</sup> is very toxic to aquatic organisms, and there is limited evidence of it being carcinogenic. The maximum daily limit of Spectrus CT1300 may be doubled in response to increased levels of the bacteria Legionella if detected. Spectrus CT1300 is potentially toxic to the liver, kidney and central nervous system. In 2014-2015, two incidents due to Methanex's aging pipelines resulted in non-compliance. In 2015-2016, two unauthorised incidents recording non-compliance in respect of Methanex's activities at the Waitara Valley site occurred<sup>29</sup>. In 2016-2017, three unauthorised incidents recording non-compliance were recorded at the two sites<sup>30</sup>. Most of these incidences were apparently related to mechanical failures or unanticipated issues. None was followed by any enforcement response.
19. These industries, by discharging wastes and contaminants, are not only polluting our environment, but pose serious risks to public health and often ignoring Maori rights. They externalise the real costs of their operations by making profits from public good. Just as there is an urgent need to transition off fossil fuels onto renewable energy, the linear model of business and product lifecycles will need to transition onto circular economies<sup>31</sup> where waste is treated as wealth (rather than liability) – good for business and good for the environment.
20. We argue that strengthening environmental regulation will create the incentives for such transitions. We argue that if such 'catch-all' rules are to remain, then Rule 13 for the relevant discharge activities should be Publicly Notified.

### **Structures and occupation**

21. Rule 18: We object to permitting the placement of any outfall structure and the associated activities in any of the CMAs. Without a resource consent, it is impossible to know whether the standards/terms/conditions are met. We submit that such activities be Prohibited or Non-Complying in CMAs Outstanding Value and Estuaries Unmodified, and Discretionary in the other CMAs.

### **Structure used for whitebaiting**

22. Rule 24: We support the Prohibited status of erection or placement of a whitebait stand in all CMAs. We also support the installation of protected whitebait breeding stations such as staked haybales at the mean high water level of stream and river mouths.

### **Exploration or appraisal drilling**

23. Rules 26-28: We are opposed to further petroleum exploration and mining onshore and offshore and therefore ask that drilling of any petroleum exploration or appraisal well and associated activities in any CMA be Prohibited. If this is not acceptable to Council, then we ask that such activities in the Open Coast and Port be Discretionary (rather than Controlled). Due to the likely effects on public access and safety risks<sup>32</sup>, we request that these activities be Publicly Notified (whether the activity is deemed Discretionary or Controlled).
24. If Council insist on Rule 26 with its Controlled status, then we ask that the setback distance of 1,000 m from sensitive marine benthic habitat (Schedule 4B), reef system or boundary of CMA Outstanding

Value be increased to at least 6,000 m. The latter is based on Cawthron (30/10/2015)<sup>33</sup> which concluded that while a distance of 1,000 m should be adequate from a single well drilling activity, a much larger buffer distance (6 km or over) could be required to reduce community-based effects from multiple wells. A more conservative approach based on the maximum zone of effects would suggest a buffer distance of 20 km for water-based drilling fluids, as discerned by the limits of barium tracers. Rule 26 condition (a) indicates that new drilling may occur beyond 2,000 m of a previously drilled site which presumably means an existing well, resulting in a multiple wells situation, requiring a minimum buffer or setback distance of 6,000 m.

### **Petroleum production installation erection or placement**

25. Rules 29-30: We are opposed to the drilling of new production wells but would support provisions for the maintenance and occupation of space by existing wells and associated infrastructure, and for the abandonment and decommissioning of wells and the associated infrastructure at the end of production life. If any new production wells are to be drilled, then prudent buffer distances as we propose in point 24 above should apply. Rule 30 relating to petroleum production, installation and associated activities in CMAs Outstanding Coastal, Estuaries Unmodified and Estuaries Modified should be reclassified as Prohibited (rather than Non-complying).

### **Temporary military training**

26. Rules 31-32: We do not support military training activities in a world where most, if not all, wars are fought over control of resources and ideologies. The NZDF, like many others, are clearly not just a 'defence' force, and they operate largely in secrecy without opportunities for public scrutiny (See the recent revelations by Nicky Hager and Jon Stephenson (2017)<sup>34</sup>. The recent fire-fighting foam contamination<sup>35</sup> around NZ's military sites and its health impacts on nearby residents illustrate some of the far-reaching and irreversible harm caused by military and associated activities. Our group stands for social justice where all can have access to the necessities of life and well-being. We do not condone violence including military actions and any potential human and environmental harm they cause.

### **Structure maintenance, repair, minor alteration, removal and replacement**

27. Rules 35 & 38: We have concern over the Permitted status of maintenance, reconstruction, removal or replacement of established structures and the associated activities in CMAs Outstanding Value and Estuaries Unmodified. We propose that they be Discretionary instead, to allow for consideration of new/up-to-date knowledge about ecosystems, species and environmental effects, technological development and proper reporting/monitoring. Furthermore, there are issues with coastlines being presumed to be Crown land where the Seabed and Foreshore Act applies and where Maori reserves have been drawn up incorrectly and/or illegally taken by neighbours. In fact, there are clear records and archaeological evidence alongside current use by tangata whenua. We understand that Council allow seabed removal in tauranga waka and dumping of dredge spoils on Maori reserves eg. Egmont Boat Club. These activities need to be notified at the very least.

### **Clearance of outfalls, culverts and intake structures**

28. Rule 51: We submit that disturbance of the foreshore or seabed and deposition of materials for clearance of outfalls, culverts and intake structures and any associated activities, especially the discharge of contaminants, be Discretionary (not Permitted) in CMA Outstanding Value and Estuaries Unmodified so that adequate consent conditions, environmental monitoring and reporting could be put in place.

## Other disturbance, damage, destruction, removal or deposition that is not provided for in Rules 51 to 59

29. Rules 60, 61: We are gravely concerned over these two catch-all rules, especially when the Proposed Coastal Plan appears to be silent on seabed mining. The latter, such as the proposed TTRL seabed mining, is an extremely destructive activity opposed by a huge number of New Zealanders, all major environmental organisations and all Taranaki iwi<sup>36,37,38,39</sup>. We submit that all seabed mining activities be Prohibited in all CMAs, including the Open Coast due to transboundary impacts of the activity.



Minerals mining (blue), exploration (red) and prospecting (green) permits in the Taranaki coastal marine area and in the EEZ. Source: NZPAM website<sup>40</sup>, accessed 23/04/2018.

## Schedules & Maps

30. Schedule 1 CMA and Schedule 2: We propose including Patea Shoals and Rolling Ground as CMA of Outstanding Value and onto Schedule 2, based on the recommendation from Cawthron, 2016<sup>41</sup> which described these areas as “*worth considering as outstanding habitats in terms of ecological sensitivity (EEZ 2012)...*” We also ask Council to assess the value of Graham Bank as Cawthron indicated that it has not been investigated and “*may be a potentially outstanding area.*”
31. We seek clarifications about the delineation of boundaries of various areas of Outstanding values and their recognition by district councils. There appears to be some mismatch between those on the Coastal Plan (e.g. Map 39 Waitotara<sup>42</sup>) and those in the Proposed South Taranaki District Plan 2016 (e.g. Rural Map 22<sup>43</sup>). Regional and district councils need to align these and other relevant boundaries as well as policies and rules.

<sup>1</sup> Climate Justice Taranaki website. [www.climatejusticetaranaki.info](http://www.climatejusticetaranaki.info)

<sup>2</sup> Climate Justice Taranaki Inc., 18 November 2016. Feedback on Draft Coastal Plan for Taranaki, August 2016.

<https://climatejusticetaranaki.files.wordpress.com/2013/03/cjt-feedback-on-draft-coastal-plan-for-taranaki-18nvo20161.pdf>

<sup>3</sup> Ministry of Justice website – Marine & Coastal Area – Takutai Moana, accessed on 22/04/2018. <https://www.justice.govt.nz/maori-land-treaty/marine-and-coastal-area/applications/taranaki-region/>

<sup>4</sup> RT Hon Jacinda Ardern, 12/04/2018. Planning for the future – no new offshore oil and gas exploration permits.

<https://www.beehive.govt.nz/release/planning-future-no-new-offshore-oil-and-gas-exploration-permits>

<sup>5</sup> Government aims to strike balance ending offshore oil exploration: PM, 12 April 2018 <https://www.stuff.co.nz/business/103031705/ardern-to-end-to-offshore-oil-exploration-with-short-reprieve-for-taranaki>

<sup>6</sup> Westpac NZ, April 2018. Climate Change Impact Report. <https://www.westpac.co.nz/assets/Sustainability/Westpac-NZ-Climate-Change-Impact-Report.pdf>



- <sup>7</sup> New Zealand Council of Trade Unions Te Kauae Kaimahi, 27/03/2018. Unions ready to start a just transition to low carbon economy. <http://www.union.org.nz/unions-ready-to-start-a-just-transition-to-low-carbon-economy/>
- <sup>8</sup> E tū website, accessed 23/04/2018. <http://www.etu.nz/industry/energy-and-mining/>
- <sup>9</sup> Ngarewa-Packer, Debbie, 14/04/2018. No oil permits? No problem – just give us time to prepare. <https://thespinoff.co.nz/atea/14-04-2018/no-oil-permits-no-problem-just-give-us-time-to-prepare/>
- <sup>10</sup> Ministry for the Environment, 2017. Our atmosphere and climate 2017 – Data to 2016. <http://www.mfe.govt.nz/sites/default/files/media/media/our-atmosphere-and-climate-2017-final.pdf>
- <sup>11</sup> Mitchell, Charlie and Ged Cann, 19/10/2017. Some New Zealand climate change impacts may already be irreversible, Government report says. <https://www.stuff.co.nz/environment/98020081/some-new-zealand-climate-change-impacts-may-already-be-irreversible-government-report-says>
- <sup>12</sup> Number of sewage overflows increases by 379 percent – report, Radio NZ 12 April 2018. <http://www.radionz.co.nz/news/national/354840/number-of-sewage-overflows-increases-by-379-percent-report>
- <sup>13</sup> Ulrich, Peter and Yinpeng Li, 10/04/2017. When a 1 in 500 year event is not as it appears: The Edgecumbe Flood of April 2017. CLIMsystems Blog. <http://www.climsystems.com/blog/post/when-a-1-in-500-year-event-is-not-as-it-appears-the-edgecumbe-flood-of-april-2017>
- <sup>14</sup> Mitchell, Charlie, 2/02/2018. Ice, fire, storms and heat: Climate change is now part of our everyday lives. <https://www.stuff.co.nz/environment/101013889/ice-fire-storms-and-heat-climate-change-is-now-part-of-our-everyday-lives>
- <sup>15</sup> Ministry for the Environment, December 2017. Adapting to Climate Change in New Zealand. Stocktake Report from the Climate Change Adaptation Technical Working Group. <http://www.mfe.govt.nz/sites/default/files/media/Climate%20Change/adapting-to-climate-change-stocktake-tag-report.pdf>
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- <sup>17</sup> Corexit, oil dispersant used by BP, is destroying Gulf Marine Life, scientists say. Huffington Post, 25/04/2013. [http://www.huffingtonpost.com/2013/04/25/corexit-bp-oil-dispersant\\_n\\_3157080.html](http://www.huffingtonpost.com/2013/04/25/corexit-bp-oil-dispersant_n_3157080.html)
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- <sup>19</sup> South Taranaki District Council website, accessed 17/04/18. Shellfish near Hawera, 15/08/17. <https://www.southtaranaki.com/Live/Press-Releases-News-Articles/Shellfish-near-Hawera/60652>
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- <sup>21</sup> Taranaki Regional Council, March 2018. South Taranaki District Council Hawera Municipal Oxidation Ponds Monitoring Programme Annual Report 2016-2017. <https://trc.govt.nz/assets/Documents/Environment/Monitoring-wastewater/MR2017-STDCHaweraPonds.pdf>
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- <sup>24</sup> Iwi leaders unanimously oppose seismic testing, 30/11/2017. Radio NZ. <https://www.radionz.co.nz/news/te-manu-korihī/345129/iwi-leaders-unanimously-oppose-seismic-testing>
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