Submission Form

Marine Consents and Marine Discharge Consents Application

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SUBMISSION115999

Submitter Name:

Malthus

Roger

Hard Copy Form ☐

Incomplete Submission ☐

Marine Consents and Marine Discharge Consents Application

Application Name:	Trans-Tasman Resources Limited iron sand extraction and processing application
EPA Reference:	EEZ000011
Applicant:	Trans-Tasman Resources Limited
Notification Date:	17 September 2016
Submissions Close:	Extension of submission period to 5:00pm, Monday 14 November 2016 Originally submission period was to close 5:00pm, Friday 14 October 2016

3. Electronic correspondence

You will receive information by email. If you are unable to receive emails, please indicate below:

☐ I cannot receive electronic copies of information and updates

4. Do you wish to speak to your submission at the hearing?*

○ I / We **do not wish** to speak about my / our submission at the hearing.

OR

◉ I / We **wish** to speak about my / our submission at the hearing.

If you **wish to speak** at the hearing, tick as many as apply to you:

☑ If others make a similar submission, I / we will consider presenting a joint case with them at the hearing.

☐ I / we wish to present in Te Reo Māori.

☐ I / we wish to present in New Zealand Sign Language.

☐ I / we intend on having legal representation (i.e. a lawyer speaking on your behalf).

☐ I / we intend to have expert witnesses to support my / our submission.

5. What decision do you want the EPA to make and why?*

If you require more space, please attach additional pages. Please include your name, page numbers and *Trans-Tasman Resources Limited iron sand extraction and processing application* on the additional pages.

- ◯ Grant
- ◯ Grant with conditions
- ◯ Neutral
- ◉ Decline

My reasons for seeking this decision are:

? Potential damage to their recreational fishing, diving and educational area both in the EPA economic zone as well as the foreshore and seabed area administered by the Taranaki Regional Council; ? We consider there is insufficient tangible economic benefit for the people of South Taranaki. There is unlikely to be any significant proportion of people employed by Trans-Tasman Resources when this project is operational. There is also likely to be little in the way of business benefits to South Taranaki district towns and in particular Patea. There is also unlikely to be any tangible improvements to the infrastructure for towns such as Patea, ie the Patea River Mouth, Wharf Facilities, new businesses; ? The removal of iron sands is the removal of another non-renewable resource in the South Taranaki district. There is insufficient evidence to suggest that the removal of this non-renewable resource is offset by a similar benefit to, in particularly the young people of our community. They would benefit more from this resource remaining in place so they can make decisions as to how best to utilise it in their future; ? The information received to date from Trans-Tasman Resources indicates insufficient research particularly with reference to the Marine environment of the seabed and the area surrounding where mining is planned. There is also insufficient field trials with the proposed equipment in a more isolated environment for a reasonable timespan, to ensure that all parties to the consent are satisfied that the claims at present made will in fact be fulfilled.

6. Do you have an existing interest that may be affected by what is proposed in this application?

- ☑ Lawfully established existing activity, whether or not authorised by or under any Act or Regulations, including rights of access, navigation and fishing
- ☐ Any activity that may be undertaken under the authority of an existing marine consent
- ☐ Any activity that may be undertaken under the authority of an existing resource consent granted under the Resource Management Act 1991
- ☐ Settlement of a historical claim under the Treaty of Waitangi Act 1975
- ☐ Settlement of a contemporary claim under the Treaty of Waitangi as provided for in an Act, including the Treaty of Waitangi (Fisheries Claims) Settlement Act 1992
- ☐ Protected customary right or customary marine title as recognised under the Marine and Coastal Area (Takutai Moana) Act 2011

What is your existing interest and how may it be affected by this application?

Resident in Taranaki since 1980. 26 years in a New Plymouth business and subsequently 8 years since 2008 in the South Taranaki district where I now live. Member of three fishing clubs, being Patea, Cape Egmont and Opunake. Also member of Hawera Dive Club and last but not least a ratepayer in the South Taranaki district. Reasons for conclusions: Having kept a fishing diary for 10 years, fishing and diving in Patea and Opunake areas, I have analysed from my diary the best catches of blue cod and snapper for one days fishing in either January or February of each year. This diary clearly indicates there is a steady decline in the availability of vulnerable species, particularly Blue Cod. TTR have made little reference to this highly sought after species which is utilised for not only food but koha. The fish has a very slow growth rate of eight to 12 years till maturity and is territorial in habit and is unlikely to travel further than one kilometre from where it was initially born and grows. Pelagic fish to the area have shown some abundance in recent years with snapper not being territorial as aren?t kingfish and tuna. Crayfish tend to migrate into our fishery and are there on a seasonal basis, as are the above pelagic fish. Past, present and future: We all appreciate the importance of this fishery to Maori be it that they struggle to maintain dependence of this fishery at present due to the current social and economic environment. Many members of the above fishing clubs are now at a stage where their age enables them to fish more often. They are also purchasing larger boats so that they can not only fish more often but are able to fish a larger geographic area. Education is becoming an important part of sharing our fishery: I have on a number of occasions taken young people out for fishing experiences, not only from New Zealand but also from many other countries. That is part of their New Zealand experience and education. I estimate that 95% of the population are not likely to be scuba divers and therefore are unable to appreciate what is actually on the seabed bottom without making dive trips. However, the initiative completed by the Hawera Dive Club of placing a camera on a reef will have some significant tangible benefits to those unable to visit the seabed bottom. Supposed tangible benefits: I am informed by Trans-Tasman resources that there will be significant employment benefits from the approval of this application. I am cautious when told this as I have a family member who has been involved in the fishing industry and is now involved in the oil and gas exploration industry. Both are international professions and given that people have sufficient experience and ticketing for a job, employees are usually sought on an international basis as opposed to the locals on a geographic basis. I am not satisfied that there is any indication from Trans-Tasman Resources that they will invest in the local economy. Previous discussions indicate that they would be servicing the drilling ship from New Plymouth and this would include more specialist items such as chandlery and food. To improve the local economy there needs to be a significant proportion of the crew and those involved with Trans-Tasman Resources spending their wage packets in the South Taranaki district to have any significant positive impact on our local economy. Royalties are obviously paid on the refined mineral resources which will be exported directly to international markets. Regrettably, these royalties are paid in Wellington and not to the South Taranaki District Council. Consequently we are then placed in a position of responsibility to endeavour to have these resources returned to the South Taranaki district so that they can have some prospect of benefitting the local community and offsetting the loss of these non-renewable resources. Given that royalties are payable, we ask the question, are such royalties to be paid on international iron ore price, or are they to be paid on the basis of the value of the micro elements that are obviously sought in the iron ore being dredged. Research and Monitoring: ? As outlined above, we recommend that field trials be initially completed for at least a 12 month period, in a less sensitive environment, using the equipment intended to fulfil the applicant?s endeavours. ? We would wish to see that an observer be stationed on all vessels on a 24/7 basis. If this is good enough for the fishing industry in New Zealand surely this type of industry would also ensure that compliance requirements are met. ? We would recommend that the management of the resource consent be placed at the responsibility of the Taranaki Regional Council who are best able to deal with environmental matters in Taranaki as opposed to management being left to parties in Wellington where there is no local responsibility and limited communication. ? We would recommend that the resource consent not be for a 25 year period but subject to five year reviews to ensure that, should the applicant not be compliant with the requirements of this application, the consent could be withdrawn. The references to this application: ? Personal fish dairies ?

Fishing.Net.NZ - Blue cod scientific facts ? Industry insights Westpac fishing, agriculture and seafood ? Taranaki Regional Council ? Cawthorn Institute Report 2877 ? Book reference ? The Plundered Planet Paul Collier I would welcome the opportunity to expand on this submission when submissions are heard and also request that the hearing be in the South Taranaki District as this is where the major part of the interest in this application is being aired.

If you would like to attach any supporting documents please do so below.

Blue Cod - Fishing Facts.doc
Microsoft Word 97 - 2003 Document
165 KB

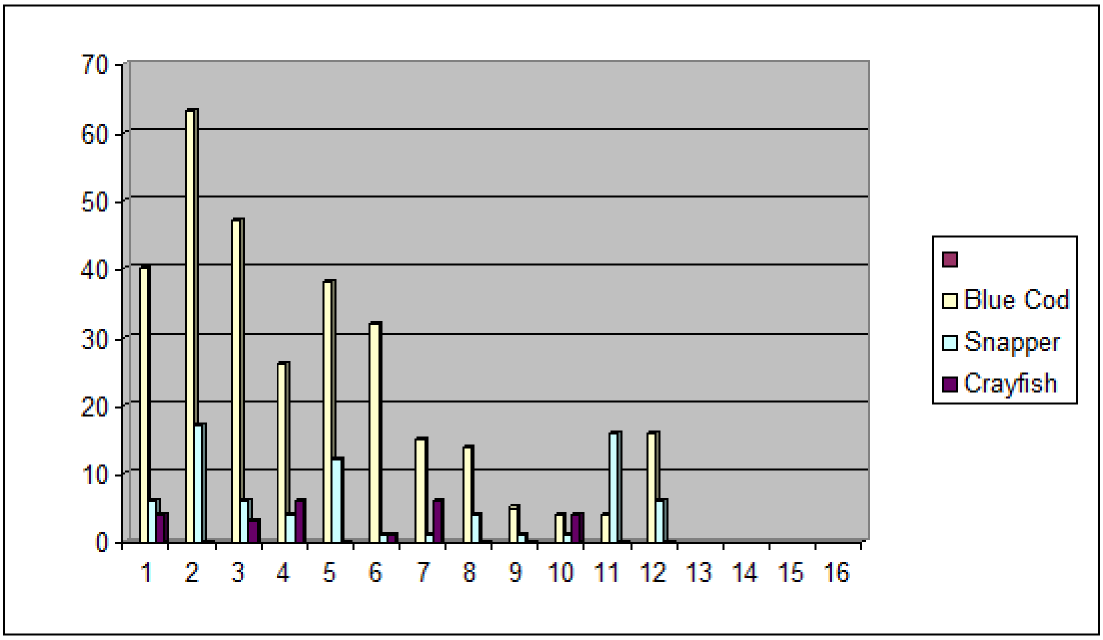
Only ONE PDF or Word document with a maximum size limit of 15MB can be attached to this submission form. Please forward larger files or file types other than PDF or Word, or multiple documents directly to the EPA on a CD or DVD or USB stick.

Email Address

☑ I wish to receive a copy of my completed submission via email.

Personal Fishing Records Over Ten Years off Patea

Dates	Blue Cod	Snapper	Crayfish
21/01/2006	40	6	4
4/01/2007	63	17	0
6/01/2008	47	6	3
6/02/2009	26	4	6
14/01/2010	38	12	0
12/02/2011	32	1	1
25/01/2012	15	1	6
8/11/2012	14	4	0
29/06/2013	5	1	0
25/01/2014	4	1	4
30/01/2015	4	16	0
26/01/2016	16	6	0



Scientific facts about Blue Cod

(an extract from Fishing.Net.NZ)

Forget the fishing stories – here is a quick review of the current scientific facts about the biology of blue cod.

By far the most popular recreational target species in the South Island, blue cod (Parapercis colias) is a bottom-dwelling fish commonly found near reefs down to a depth of 150 metres. Generally avoiding kelp forests and large rocky platforms, blue cod are opportunistic carnivores ranging mainly over open ground at reef edges.

Blue cod are not actually related to the true cods; in fact they are weevers (genera Parapercis), which are part of the wider sandperch family, with about 50 species internationally, occurring in both shallow water and depths to over 200 metres.

Blue cod are endemic and occur throughout most of New Zealand. While found from the shore to the edge of the continental shelf, they are primarily coastal and most abundant in temperate areas south of Cook Strait. Often attracted to divers, these naturally inquisitive fish are easily coaxed to hand-feed, even in remote areas where divers are rare.

Early development

After spawning, blue cod eggs float to near the surface and hatch after about six days. Larvae then remain floating for another three days or so before settling to the sea floor at around half a centimetre long. Generally not observed until at least 3cm, baby blue cod are mainly found among rubble or associated with living structures such as sponges, horse mussels etc (biogenic reefs). These very young fish require some habitat structure to avoid predators (often larger blue cod) and to find food such as tiny crustaceans.

Movement patterns

Typically a slow-moving fish, blue cod swim mainly propelled by their pectoral fins in a distinctive sculling motion, but are capable of sudden bursts of speed using their tail when required.

Large-scale tagging programmes have been done in the Marlborough Sounds in 1940−’41 and again in 1973−’76. These studies recorded maximum distances moved of 48km and 42km respectively; however, only 9% and 25% of blue cod moved more than a mile during the 13 and 28 months of these two studies.

Further south, tagging studies in Foveaux Strait (1998−1999) and Dusky Sound (2001−02) recorded maximum distances moved of 156km and 30km respectively. However, most fish moved less than 800m over 20 months in Foveaux Strait and less than 600m over 17 months in Dusky Sound. In fact, last year in Dusky Sound I recovered another three blue cod that I had tagged seven years earlier, and none had moved more than 350m.

While a few blue cod do move some distance, they are the exception, and the small amount of movement shown by most fish in these studies explains why blue cod may be vulnerable to over-fishing and local depletion. Blue cod can therefore benefit from smaller scale localised management in areas of high fishing pressure.

Social structure

While blue cod may aggregate when feeding, they do not school. As with other Parapercis species, large male blue cod probably defend rather loose territories. This has been observed directly in Northland, where small social groups have been recorded, with the territory of a large dominant male encompassing the home ranges of three to five females. The size of the territory appears to increase as the size of the fish increases.

Feeding

With large eyes, a wide mouth and an inquisitive nature, blue cod are voracious and opportunistic feeders. The main prey items of blue cod are crustaceans, small fish, shellfish, worms and small octopus. However, blue cod will eat almost any available animal matter, and their diet probably reflects what is most abundant in the environment. In one area, 52 different prey species were identified in the diet.

Growth

Blue cod grow to over 55cm in length, over 4kg in weight, and can reach a maximum age of more than 30 years. This moderately-slow growing species varies in growth rates around New Zealand, with males generally growing faster and larger than females. It takes up to 11 years for males and 12 years for females to reach the minimum legal size of 33cm in Southland. Further north growth may be a little faster, but it can still take seven years for males and 11 years for females to reach the 30cm size limit in the Marlborough Sounds.

Colour phase

The colour of blue cod changes with size; juveniles (5−15cm long) have a whitish body with two brown stripes running the entire length. Maturing fish darken to a rusty brown and the stripes become barely distinguishable. Beyond 25cm both sexes change colour to a mottled grey, which lasts until about 30cm, when a further change to green or blue occurs. Larger fish then develop a green-blue head, wide stripes and a pale belly. Both sexes occur in these colour phases, so it is not possible to sex blue cod by colour.

Reproduction

Like growth, size at sexual maturity also varies between locations. Fish in the Marlborough Sounds mature sexually at 21−26cm, compared to those in Southland which mature at 26−28cm. Blue cod have a relatively long spawning period, potentially ranging from early spring to mid summer, and evidence suggests that spawning occurs locally for both inshore and offshore populations.

Sex change!

Like other weevers, blue cod are able to change sex from female to male, but the presence of some large, older females suggests that not all blue cod undergo sex change. Just what controls sex change is largely unknown, but it is likely to be a complex process that is influenced by size, age and social interactions. In particular, the aggressive territorial behaviour of large males may be an important factor that suppresses sex inversion in smaller females. This may explain why catches from heavily-fished areas, such as the Marlborough Sounds, tend to be dominated by males (because there are no large males to suppress female sex change), while catches from areas with less fishing pressure, such as Dusky Sound, usually have a more balanced sex ratio. Just what effect a sex ratio biased towards males has on the reproductive output of blue cod populations is unknown, but a maximum legal size may be appropriate for blue cod in areas of high fishing pressure to ensure that some large fish remain in the population.