

Coastal Resources Limited marine dumping consent application

Submission Reference no: 72

Andrew Jeffs

Submitter Type: Not specified

Source: Email

Overall Notes:

Clause

Do you intend to have a spokesperson who will act on your behalf (e.g. a lawyer or professional adviser)?

Position

No

Notes

Clause

Do you wish to speak to your submission at the hearing?

Position

Yes I/we wish to speak to my/our submission at the hearing

Notes

Clause

If you wish to speak to your submission at the hearing, tick the boxes that apply to you:

Position

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

Notes

Clause

We will send you regular updates by email

Position

I can receive emails and my email address is correct.

Notes

Clause

What decision do you want the EPA to make and why? Provide reasons in the box below.

Position

Refuse

Notes

Full submission is attached



7 September 2018

Coastal Resources Limited Application
Environmental Protection Authority
Private Bag 63002
Waterloo Quay
Wellington 6140
Via email: CRL.application@epa.govt.nz
Cc: mary-ellen@kaipara.co.nz

Re: Submission CRL Application

I am a Professor of Marine Science at the University of Auckland where my research interests span coastal ecological processes, invasive marine species, and underwater sound. Much of my research has been conducted in the Hauraki Gulf and consequently I am familiar with this marine environment.

I have several areas of concern regarding the proposal by CRL to expand their current marine dumping operation.

Marine Biosecurity

The Bio researchers report, and the provided correspondence from MPI, fails to identify the designated unwanted marine organism, *Undaria pinnatifida*, among those likely to be of concern for this proposal. This species is commonly found around the Auckland waterfront, especially in marinas. It is also likely to be transported with dredge spoil. I have seen detached specimens of this species floating in the water column so it clearly has a large potential dispersive range after release at sea, especially as the breeding stage of this species can contain large numbers of spores.

It is a requirement under the Biosecurity Act for the knowing transport of unwanted organisms to require a section 52 approval. I am familiar with this requirement as I hold such an approval for the relaying of cultured mussels across the Hauraki Gulf for experimental work aiming to recover mussel beds destroyed by fishing last century. In our case we are taking mussels from mussel farms in Coromandel and redeploying them to form mussel beds on the seafloor in the Mahurangi Harbour. Both the source and receiving sites contain the same sets of invasive marine organisms, however, the Ministry of Primary Industries requires us to thoroughly clean the mussels at source (i.e., at harvest in Coromandel), transport them in biosecure conditions, chemically treat them to provide 100% kill of marine invasive species before they can re-enter the sea. My recent discussions with senior marine biosecurity personnel confirm that this approach is essential to ensure adequate containment of invasive marine species and is a requirement of the Biosecurity Act.

The documentation supplied with this proposal implies that CRL is requesting a different standard of containment of marine unwanted organisms, despite transiting through, and depositing into areas of seabed, where these marine unwanted organisms are not currently present. This appears wholly inconsistent with the standard to which others are currently being held for similar activities which have much lower risk of extending the existing range of these unwanted marine organisms. The applicant should be required to obtain a section 52 approval and meet the same or higher standards as existing holders of approvals, i.e., cleaning at source, transport in biosecure conditions, treatment to ensure 100% kill rate of unwanted organism, prior to release.

Alternatives

The applicant has provided a cursory appraisal of alternative land-based disposal options for soil which is nearly 8 years old. It does not give any consideration to the full range of disposal options/sites, (e.g., Puketutu Island, or rail freighting to sites out of Auckland, or greenfields sites). The economic report which dismisses alternative options as prohibitively expensive is also cursory in nature and uses bald cost estimates with no clear sourcing of information. Land based disposal options would overcome many of the environmental concerns with sea-based disposal and should be given greater consideration despite possible higher logistic costs.

Marine Mammals

The proposed disposal site is in an area of marine mammal activity, as confirmed by long term recordings from the NZDF underwater listening station on the east coast of Aotea. These existing data were not referred to at all by Bioresearchers report. Heavy vessel activity generates high levels of underwater sound and is well known to interfere with normal marine mammal behaviour. The assessment of the potential effects on marine mammals provided by the applicant is also cursory in nature, and the current consent provisions for protecting marine mammals are inadequate in my professional view. For example, it is extremely difficult to see marine mammals in rough sea conditions or at night, and the underwater sound recording equipment described for use is highly unlikely to detect marine mammal calls when operated from a heavy vessel with a running engine.

Recommendation

I would recommend the application be declined or put on hold, until the applicant can provide;

- adequate provisions for meeting current accepted standards for marine biosecurity can be implemented,
- a more comprehensive assessment of alternative land-based disposal options,
- a more thorough assessment and plan for managing the potential impacts on marine mammals.

Yours sincerely

A handwritten signature in black ink, appearing to be 'A. Jones' or similar, written in a cursive style.

Dr Andrew Jeffs
Professor of Marine Science