

EPA Report

Analysis of Submissions

Coastal Resources Limited

EEZ100015

SEPTEMBER 2018



**Environmental
Protection Authority**
Te Mana Rauhi Taiao

New Zealand Government

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Purpose of this report

This Analysis of Submissions report is not required by the EEZ Act. It is a non-statutory document that has been prepared to provide the DMC with high level analysis of some key characteristics and themes in the submissions on the Coastal Resources Limited marine dumping consent application, to the extent that the submissions are capable of meaningful analysis.

This report does not remove the obligation on the DMC to read all submissions and supporting representations and evidence.

Submission statistics

The submissions period was open for 30 working days from **30 July 2018** to **10 September 2018**.

Seventy-six (**76**) submissions were received.

One of the submissions was received after the submissions period closed, and was accepted as a late submission by the DMC on 24 September 2018.

No incomplete submissions were received.

Submitters by location

Table 1: Submitters by location

Region	Total number of submitters	Number of submitters that wish to be heard
Auckland (excl. Great Barrier Island)	35	16
Great Barrier Island	31	1
Other	10	4
Total	76	21

Submitters to be heard

Twenty-one submitters wish to speak to their submission at a hearing. Sixteen of these are in the Auckland region (Table 1).

Table 2: Details of submitters that wish to be heard

Submitter category	Number of submissions
Submitters with legal representation	2
Submitters with expert witnesses	9

Submitter positions on matters

The majority (83%) of submitters wished the application be refused, 12% wished the application be granted, and 5% wished the application be granted with conditions (Table 3).

Table 3: Submitter positions

Submitter positions	Number of submissions
Grant	9
Grant with conditions	4
Neutral	0
Refuse	63

Submissions received by sector

Individual submitters formed the largest sector of submitters at 56%.

Sector	Number of submissions
Individuals	43
Business	17
Māori (Iwi/Hapu)	8
Groups/Societies	6
Local Government	1
Government Departments	1

Reasons for submissions

Reasons for granting

Of the nine submitters wishing the DMC to grant the consent, the main reasons cited are:

1. Necessity of vessel passage and marina function

- 7 submitters (9%) cited the need for dredging to maintain safe vessel passage and marina function.

2. Minimal environmental impacts

- 4 submitters (5%) cited a minimal effect of the dumping activity on the marine environment and minimal dispersal of dumped material.

3. Dumping location

- 4 submitters (5%) cited the location of dumping material is preferable to other options due to accessibility from Auckland and cost.

4. Economic certainty

- 4 submitters (5%) cited economic certainty to marinas that require on-going dredging.

Reasons for refusing

Of the 67 submitters wishing the DMC to refuse the consent (including those that wish grant with conditions), the main reasons cited are:

1. Environmental concerns

- 29 submitters (38%) raised concerns relating to the effects on marine life (including seabirds) in the vicinity of the dumping site. Five (5) of these are specific to the marine life around Great Barrier Island.
- 16 submitters (21%) raised concerns relating to water chemistry, water quality, and effects of pollutants, heavy metals, or inorganic materials.
- 1 submitter was concerned about the effects of micro-plastics on the beaches of Great Barrier Island.

2. Information inadequacies/uncertainty

Relating to effects

- 11 submitters (13%) raised concerns relating to insufficient or inadequate information on the existing environment.
- 6 submitters (8%) raised concerns relating to insufficient or inadequate information in the application documents to predict effects on the environment.
- Other submitters raised concerns relating to insufficient or inadequate information regarding cumulative effects, the volume of the dredged material, and section 39 matters.

Relating to mitigation measures

- 7 submitters (9%) raised concerns relating to the proposed mitigation measures/conditions.

Relating to existing interests/consultation

- 9 submitters (11%) raised concerns relating to a lack of engagement with local communities, iwi, commercial interests, or a general lack of social licence.

3. Amenity concerns

- 12 submitters (16%) raised concerns relating to the potential or unknown effects of the activity on the surf breaks at Great Barrier Island.

4. Effects on fishing/marine farms

- 11 submitters (14%) raised concerns on the potential or unknown effects of the activity on commercially/recreationally fished species and/or marine farms.

5. Biosecurity

- 10 submitters (13%) raised concerns relating to potential biosecurity risks in the vicinity of the dumpsite or at Great Barrier Island.

6. Dumping location

- 8 submitters (11%) cited land-based disposal options as a preferred alternative.
- 10 submitters (13%) raised concerns relating to the location of the proposed dumpsite (too close to Great Barrier Island or Hauraki Gulf Marine Park).

7. Concerns relating to Māori matters

- 5 submitters (7%) raised concerns relating to the potential impacts on Māori values or culturally important sites.

ENDS



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