

Coastal Resources Limited marine dumping consent application

Submission Reference no: 91

David Boersen, **Empire Capital Limited**

Submitter Type: Not specified

Source: Email

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 1

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

Position 2

I/We intend to have legal representation (i.e. a lawyer speaking on your behalf).

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

Grant

Notes

Full submission is attached.

Marine dumping consent application

Application Name: Coastal Resources Limited Marine Dumping Consent

EPA Reference: EEZ100015

Applicant: Coastal Resources Limited

Submissions open on: 9.00 am 30 July 2018

Submissions close on: 5:00 pm 10 September 2018

1. Contact Details

- Empire Capital Limited

2. Spokesperson

- David Boersen
- 21 Sir Peter Blake Parade, Bayswater 0622
- David.boersen@empirecapital.co.nz
- Mobile: 0276890586

3. Empire Capital Representatives wish to speak to its submission at the hearing

- a. We intend to have legal representation at the hearing
- b. We intend to have expert witnesses to support our submission

4. Regular Updates

- a. I can receive emails and my email address is correct

5. I would like the EPA to make the following decision:

- a. Empire Capital would like clarification of the material able to be disposed of at the site. For example, will this include material dredged from the sea that has been stockpiled for a period of time.
- b. Empire Capital want the EPA to **grant the application**;
- c. My reasons for seeking this decision are:
 - i. The current site is the only viable disposal site within a reasonable distance of Auckland;
 - ii. The current consent does not have the capacity to accommodate the long-term marine dumping needs for material being dredged from various sites around Auckland, with additional material likely from the Waikato region;
 - iii. In some instances, material has been dredged from the seabed and stockpiled for later disposal. Provided this material achieves the specified quality standards set for the MDA, stockpiled marine sediments should also be able to be disposed of at the MDA.

- iv. Dredging is critical to the operation of most of Auckland marinas. Without an accessible disposal area, marinas would soon be filled with sediment and not be able to operate effectively. Other options for disposal of dredged material are prohibitively expensive;
- v. Many of the ferry terminals in Auckland, including in marina basins, need to be dredged. Without a disposal area for that dredging, ferries would not be able to operate.
- vi. The proposed location is a suitable site because:
 - It is accessible to areas where dredging is being undertaken and transportation is viable;
 - The site is well known to disposal operators;
 - It is located outside the Hauraki Marine Park;
 - Experience to date has shown that disposed dredged material falls; fairly quickly to the seabed and is not easily resuspended;
 - The Ecosystem at this location is not shown to be particularly sensitive
 - The application material has demonstrated that marine mammals are generally not present in the area and the sea floor habitat is not conducive to fin fish feeding; there is no threat to human safety or health;
 - Any effects can be retained within the disposal site, and will be minimal;
 - The proposal will not be contrary to the purpose of the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012;

6. Recommendation

Empire Capital recommends the application is granted.



David Boersen
Development Manager
Empire Capital Limited