

[Redacted]

From: Otago Regional Council <notifications@engagementhq.com>
Sent: Thursday, 9 April 2020 12:31 pm
To: [Redacted]
Subject: Anonymous User completed Submission Form – Proposed Water Permits Plan Change (Plan Change 7) to the Regional Plan: Water

Anonymous User just submitted the survey 'Submission Form – Proposed Water Permits Plan Change (Plan Change 7) to the Regional Plan: Water' with the responses below.

Full name of submitter

Bligh Vergeer

Name of organisation (if applicable)

N/a

Email

[Redacted]

Postal Address (or alternative method of contact)

[Redacted]

Phone number

[Redacted]

Do you wish to be heard in support of your submission?

(Being 'heard' means speaking at a hearing)

No

Could you gain an advantage in trade competition from this submission?

No

Are you directly affected by an effect of the plan change that:

- a) adversely affects the environment; and
- b) does not relate to trade competition or the effects of trade competition

I am

State what your submission relates to and if you support, oppose, or want it amended:

(e.g. support rule 'x', or amend policy 'y')

The ORC has not considered the effect that this rule change will have on small scale suction dredge miners. The Plan Change and s32 analysis does not acknowledge or understand the numerous suction dredge gold miners in Otago who are forced to seek consent, including for non-consumptive water takes. The proposed policies and rules do not provide any policy support to these non-consumptive takes and force them via a non-complying consenting pathway and a maximum duration of six years. Given the costs associated with renewing consents this presents an unnecessary burden on hobby gold dredgers with no environmental benefit.” “Provide for non-consumptive takes such as suction gold dredging as a permitted or controlled activity and adopt a sensible term of consent for these takes rather than a blanket 6-year term that is commensurate with the (if any) effects on the environment.” “Your plan change has not considered non-consumptive takes that have no impact on the environment but require a resource consent. It would be counter-intuitive to force a non-consumptive take via a non-complying consent process and require a maximum duration of 6 years. Many non-consumptive takes are in conjunction other consents, and a 6-year maximum term will require the cost and frustration of having to seek further consents from your Council outside the natural consenting cycle.

State what decision you want the Otago Regional Council to make:

(e.g. amend policy ‘y’ to say....)

Specifically exclude suction dredge mining from 6 year consent length limit.

Give reasons for the decision you want made:

(e.g. I want policy ‘y’ changed because...)

Because suction dredging is a non-consumptive water take that has NO acute or chronic adverse environmental impact. This layer of beauracracy would make hobby suction dredging prohibitively expensive, as consent would need to be renewed every six years. And I reiterate - suction dredging has no known adverse effects on the natural environment.