

Proposed Natural Resources Plan:

Submitter:

**New Zealand Diving and Salvage
Limited**

Submitter Number:

S147

Form 5: Submission on the Proposed Natural Resources Plan for the Wellington Region
 This is a submission on the Proposed Natural Resources Plan for the Wellington Region pursuant to
 Clause 6 of Schedule 1, Resource Management Act 1991



To: Freepost 3156
 Wellington Regional Council
 PO Box 11646
 Wellington 6142

Or email: regionalplan@gw.govt.nz

Your details

Full name: Sol Fergus
 Organisation name: (If applicable) New Zealand Diving and Salvage Limited
 Address for Service: 134 Gracefield Rd, Seaview, Lower Hutt 5010
 PO Box 30-392 Lower Hutt 5040

Telephone no's: Work: 04 568 2505 Home: Cell: 027 461 0500

Contact person: Sol Fergus

Address and telephone no (if different from above):

Electronic communication

Wellington Regional Council has a preference for providing information about the Proposed Natural Resources Plan via email. We will send you updates on the process, information and provide you with details of any meetings and the hearing. Please tick here if you do not agree to receive communication via email.

Email address: sol@nzds.co.nz / nzds@nzds.co.nz

Trade competition

I/we could not gain an advantage in trade competition through this submission. [Go straight to Your Submission]

I/we could gain an advantage in trade competition through this submission.
 If you could gain an advantage please complete one of the following:

I/we are directly affected by an effect of the subject matter of my submission that adversely affects the environment and does not relate to trade competition or the effects of trade competition.

I/we are not directly affected by an effect of the subject matter of my submission that adversely affects the environment and does not relate to trade competition or the effects of trade competition.

Your submission

The specific provisions of the Proposed Natural Resources Plan that this submission relates to are:

The specific provision of the Proposed Natural Resources Plan that my submission relates to is (please specify the provision/ section number): 5.2.7 Biofouling cleaning Rule 65: in-water cleaning - permitted activity (C)	My submission on this provision is: →	<input type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input checked="" type="checkbox"/> I wish to have the specific provision amended
	Reasons for my submission: →	Provision of clarity and alignment with Anti-fouling and in-water cleaning guidelines.
	I seek the following decision from WRC	The rule to be amended to permit in-water cleaning of any vessels regardless of origin with a micro-fouling level without need for containment.

	(give precise details): →	Guidelines recommendations for decision making on in-water cleaning pg 12. "Microfouling, regardless of origin, may be removed without the need for full containment of biofouling waste, provided the cleaning method is consistent with the coating manufacturer's recommendations. Where microfouling is removed using a gentle, non-abrasive cleaning technique...."
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	Reasons for my submission: →	Clarity of proposed rule
	I seek the following decision from WRC (give precise details): →	<p>That the proposed rule as written permits the in-water cleaning of regional and domestic vessels (as classed in the Anti-fouling and in-water cleaning guidelines pg 11) regardless of micro and macro-fouling state and without containment.</p> <p>This would be inclusive of the Cook Strait passenger ferries.</p> <p>If this is not the intention of the rule then amendment to clarify what activities are permitted for each of the identified vessel classes as per that described in the guidelines on pg 12.</p>

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The specific provision of the Proposed Natural Resources Plan that my submission relates to is (please specify the provision/ section number): 5.2.7 Biofouling cleaning Rule 65: in-water cleaning - permitted activity (f)	My submission on this provision is: →	<input type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input checked="" type="checkbox"/> I wish to have the specific provision amended
	Reasons for my submission: →	Increase ownership and avoid potential gap of reporting. Make allowance for already established non-indigenous species within the Wellington Region.
	I seek the following decision from WRC (give precise details): →	<p>Amendment of the rule to make allowance for non-reporting of existing / established non-idigenous species within the Wellington Region and include reporting ownership of species discovery on the in-water cleaning operator.</p> <p>"If any suspected species harmful or unusual aquatic species are found that are either new to New Zealand or the Wellington Region, the vessel owner and / or the in-water cleaning operator shall take the following steps*":</p>

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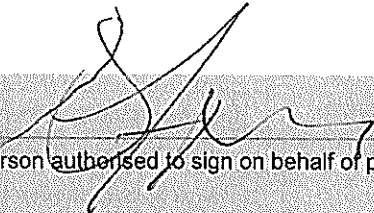
The specific provision of the Proposed Natural Resources Plan that my submission relates to is (please specify the provision/ section number): 5.2.7 Biofouling cleaning Rule 65: in-water cleaning - permitted activity (D)	My submission on this provision is: →	<input type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input checked="" type="checkbox"/> I wish to have the specific provision amended
	Reasons for my submission: →	Confirmation that the permitted activity does not require additional consent processes specifically pertaining to the return of filtered / processed water resulting from containment activities
	I seek the following decision from WRC (give precise details): →	It is of understanding that an in-water cleaning activity that involves capture and filtering processes would produce a requirement to return water to the ocean. Can there be clarity if this would require an additional consent to enable return of the filtered water. If there is a requirement we seek an amendment to incorporate this.

If you have more submissions you wish to make, please find more boxes at the bottom of this document

Attendance and wish to be heard at hearing(s)

- I/We do wish to be heard in support of my/our submission
[Note: This means that you wish to speak in support of your submission at the hearing(s).]
- I/We do not wish to be heard in support of my/our submission
[Note: This means that you cannot speak at the hearing. However, you will still retain your right to appeal any decision made by the Wellington Regional Council to the Environment Court.]
- If others make a similar submission, I will consider presenting a joint case with them at a hearing.

Signature: Sol Fergus



Date: 25 September 2015

[Person making submission or person authorised to sign on behalf of person making submission. NB. Not required if making an electronic submission]

Publication of details

Wellington Regional Council is legally required to notify a summary of submissions, including your name and address for service as provided on this submission form. Your name and address are included so that a person making a further submission is able to serve you with a copy of it.

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The specific provision of the Proposed Natural Resources Plan that my submission relates to is (please specify the provision/ section number): 5.2.7 Biofouling cleaning Rule 65: in-water cleaning - permitted activity (D)	My submission on this provision is: →	<input type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input checked="" type="checkbox"/> I wish to have the specific provision amended
	Reasons for my submission: →	Clarity regarding the rule as is written and the context which it is provided for compared to that in the guidelines.
	I seek the following decision from WRC (give precise details): →	That the requirement for capture is intended and only applicable to vessels of doemstic / international origin with macrofouling as described in the guidelines pg 12. Macrofouling of Domestic vessels may not require capture where these vessels are determined to have a fouling type that is identified as cosmopolitan and/or equivilant to that of a Regional origin.

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	Reasons for my submission: →	
	I seek the following decision from WRC (give precise details): →	

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	Reasons for my submission: →	
	I seek the following	

	decision from WRC (give precise details): →	
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