

Submission by G V & V M Kerr in opposition to RMA Application #2101.198 to deposit up to 7.2 million cubic metres of dredged material at the offshore disposal site A0

14th April 2011.

In our written submission with regard to the applicant's proposal to deposit up to 7 million cubic metres of dredge spoil in the sea off Taiaroa Head, our 3 main objections were...

1. That the application did not adequately address the damaging effects of dumping dredge spoil to the local coastal environment.
2. That the site A0 was not adequately investigated or modeled and
3. that the monitoring proposal was incomplete.

While we understand that the applicant has now done some modeling at site A0 and tabled an Environmental Management Plan, our main objections to the proposal have not changed.

All life on this planet is dependent on the ability of plants to photosynthesize. Fine sediment in suspension reduces the amount of light that can reach marine plants and below a critical threshold photosynthesis will not occur. We are concerned that fine sediment in the dredged material will very likely have a negative effect on phytoplankton and plants that form the basis of the food chain.

On page 14 of the Environmental Management Plan (otherwise called the EMP) with regard to monitoring of Major capital dredge plant disposal at site A0, it is proposed that 2 turbidity meters be deployed at the north east corner of A0. The north east of A0 is the off-shore edge only. It is difficult to have confidence in an EMP which monitors the drift of material in the opposite direction to that which everyone is worried about.

Point 15 on page 3 of the EMP states " This EMP document should be thought of as a 'live document' that will be reviewed, updated and referred to throughout the project" . In other words it can be changed and altered. It is not appropriate for consent to be given for a project which could cause serious environmental damage, when the monitoring programme is not fixed.

The applicant states "the effects of Project Next Generation are either minor, or can be appropriately avoided, remedied or mitigated" They give no descriptions or any detail as to exactly how any damage to ecosystems is to be mitigated or remedied.

- *How would the applicant mitigate the effects?*
- *How could they remedy damage?*

The applicant has described the Next Generation project as essential. It has been suggested that if this work is not done then the region will miss out on millions of dollars. The applicant also claims that there is no alternative to disposing of the dredged material at sea.

This same company is expecting to be allowed to monitor itself. This is not acceptable, all environmental monitoring should be developed, run & assessed by an independent body acceptable to all involved parties.

We contend that consent should not be granted for the application.

Greg & Viv Kerr
RD 1 Waikouaiti
Otago 9471