

Ngāti Mutunga o Wharekauri Iwi Trust

*Abalone Resource Limited – Whangamoe Resource
Consent Application*

Submission – July 2013

Introduction

The Ngāti Mutunga o Wharekauri Iwi Trust ("the Trust") represents the collective interests of Ngāti Mutunga o Wharekauri (NMOW), and is a mandated iwi authority for the purposes of the Resource Management Act 1991 and the Māori Fisheries Act 2004. Although the Trust speaks for NMOW on a number of matters, the mana and decision-making powers remain with NMOW, according to NMOW tikanga/kawa. This then forms the basis for this submission from the Trust to the Chatham Islands Council (CIC).

Our Purpose

- To be the repository of the collective Tino Rangatiratanga of Ngati Mutunga O Wharekauri
- To represent the collective interest of Ngati Mutunga O Wharekauri and be the legal representative of Ngati Mutunga O Wharekauri in relation to the collective interest
- To make and pursue the settlement of claims on behalf and for the benefit of Ngati Mutunga O Wharekauri under the provisions of the Treaty of Waitangi Act 1975
- To be the mandated iwi organisation for Ngati Mutunga O Wharekauri

Benefit Provision

To advance the social and cultural development of Ngati Mutunga o Wharekauri beneficiaries and distribute benefits directly or indirectly to beneficiaries, irrespective of where they may reside, when and where the Trust may decide.

Tikanga

To promote and preserve, protect and maintain the identity, mana, Tino Rangatiratanga, culture, history, traditions, arts and crafts, tikanga, reo, and taonga tuku iho of Ngati Mutunga o Wharekauri.

Overview

This submission is the Ngāti Mutunga o Wharekauri response to an application for a Resource Consent at Whangamoe. The permit is for the purpose of:

- Occupying a defined eight hectare Coastal Marine Area site at Whangamoe inlet
- Retaining marine farming structures
- Undertaking the activity of marine farming of designated species (paua, seaweed, kina, dredge oysters, blue pearls, horse green lip mussels)
- Retaining long line anchors.

The consent is sought by Abalone Resources Limited (Pita Thomas) and appears a renewal of an existing but lapsed consent previously held by Roger Beattie.

The Trust acknowledges Pita Thomas and his efforts to create economic opportunity on the island. His willingness to meet with Trustees and talk to the application was also appreciated (occurred June 27 2013).

Consent Renewal Features

The features of the consent are:

- An 8 hectare coastal marine area site (see page 7 of the attachment)
- No change in the area 'footprint'
- The area for farming is situated away from a current 'Rahui Recreational Area' (see page 8 figure 2 of the application)
- Species to be farmed are paua, seaweed, kina, dredge oyster, Mussels

The farming method proposed is as follows (see page 10 of the application):

- Japanese longline system utilising rope droppers (oysters, mussels, seaweed)
- Purpose designed culture barrel for other species (paua, kina etc)

Scale of operations is (see page 13 of the application):

- 8 hectares in area (200m by 400m rectangular area – just under 20 acres)
- 1000 barrels / 24 long lines
- Depth from 9m to 12m
- Theoretical capacity = 130,000 juvenile paua, 60,000 adult paua (20t by weight)

Environmental / ecological impacts are as follows:

- Placement of anchor blocks on the sea bed
- Character effects of barrels in the inlet
- Organic debris (waste / faeces / associated farming by-product including shells and natural mortality of species being farmed)

Environmental Mitigation Plan

The proposed mitigation features are:

- Assessment of seabed conditions to accurately place mooring blocks to minimise environmental hard
- Remote location limits character impacts
- Low surface buoy density to minimise visual (character) impacts
- Limiting one buoy to every 10 metres of surface (total of 300 buoys maximum)
- Well flushed inlet
- Commitment to industry standards and guidelines to measure turbidity and / or nutrient depletion
- Relatively low density farming operation
- No artificial feed – local feed only

Iwi Trust Response

Summary

- Understanding the total waste deposit by kg/tonne (faeces production, shell drop, natural mortality)
- Natural waste rate within Whangamoe
- Flush rate of the inlet and amount of natural materials flushed currently, with a consideration of how much additional farmed materials can be flushed in total
- Better description of disease in farmed animals and their impact on wild-stock should the disease escape
- A more detailed disease management plan
- More detail on predatory wild stock fauna and whether farms increase them disproportionately above their natural population size (in the wild)
- Land disposal of farm 'waste' (impact on waste disposal area)

Waste Deposit – Flush Rate of Inlet

The theoretical biomass is 20t by weight of paua. There appears no estimate of the potential biomass of the other planned species. For example, the application at page 17 refers to shell drop for mussels. Interestingly, the Morissey study described at page 18 makes it clear that waste in relation to organic, waste etc is "...case specific."

In any case, 20t of paua will produce a measureable and calculable amount of waste deposit. The Iwi Trust would expect to see further detail on what that rate might be. It should not be difficult to determine this by using benchmarks from similar farms in New Zealand.

Any measure of waste deposit needs to include wild-stock within the inlet. The Iwi Trust notes no survey of existing wild-stock has occurred. This needs to be addressed so that a total waste deposit can be determined (wild and farmed).

The Iwi Trust then expects to see further consideration of the natural flush rate of the inlet. The Iwi Trust notes at page 16 of the application that:

"Whangamoe inlet is well flushed site making it unlikely there will be any measurable accumulation of organic material..."

We note further the commitment of Abalone Resources Limited to follow industry guidelines set by Aquaculture New Zealand to mitigate adverse effects. Whilst these are reassuring commitments, there is still a lack of detail around the flush rate of the inlet relative to waste generation. The Iwi Trust requires some measurement around the assertion that the inlet is 'well flushed' and that it is 'unlikely' there will be any measurable accumulation of organic material.

Waste Disposal

Farming activities produce land based waste. It appears there is a potential for significant additional waste to occur including:

- Shell by-product
- Fuel
- Building by-product
- Human induced waste
- Offal

The Trust would appreciate further detail on disposal method of waste, location of disposal, and acknowledgement from Council that there is capacity to take waste from the proposed farm.

Disease Management

Farming of any stock (whether land or sea based) increases the potential for disease. This is a natural consequence of farming activities. There appears no description or indeed identification of disease types that affect the various proposed farmed species. Greater detail on what diseases can affect which species is required. Equally, we would expect to see a 'rate of disease' outbreak description in relation to farmed animals.

Of absolute concern to the Iwi Trust is the potential for disease to escape from aquaculture activities into wild-stock populations. The Trust cannot over-emphasise the disastrous consequences of an outbreak stemming from a farm on the island's biggest economic resource.

Further detail on the following is required:

- Types of diseases
- Risk identification of disease outbreak relative to increasing farming intensity
- Frequency of testing for disease
- Clear description of both mitigation and management of disease should there be an outbreak (e.g. destruction of stock and how this would occur)
- Containment of disease to protect wild-stock
- Rate of disease spread should an outbreak occur from farming activities.

Predation

Similar details around predation management are required as per disease management. Any increase in stock (whether wild or farmed) will bring a rise in natural predation. The Iwi Trust wishes to see further detail on the following:

- Types of predators relative to species
- Management of stock to reduce rate of predation
- Whether a natural rise in predation from farming activities will see an exponential rise in wild-stock predation as the 'low hanging fruit is exhausted'.

Conclusion

The Trust thanks Abalone Resources Limited (ARL) and the Chatham Island Council for the opportunity to consider ARL's resource consent application. The Trust reiterates its commitment to sharing knowledge and resources for the long term benefit (and viability) of our island. The Trust is not opposed to aquaculture and the development of economic opportunities on the island. Rather, the Trust is concerned to ensure that any activities that impact livelihoods on the island (both positive and negative) occur with risks identified with carefully thought through mitigation plans.

The Trust acknowledges that some of the identification and mitigation plans may arise from Ministry of Primary Industries 'Undue Adverse Effects (UAE)' tests related to the concerns raised in this submission. If that is so the Trust would be grateful for additional information as to how UAE results impact on-going certification and permitting of activities on the proposed farm.

Ngāti Mutunga o Wharekauri Iwi Trust welcomes the opportunity to discuss this proposal further with the applicant and council.

Naku noa



Ward Kamo
Trust Secretary
Ngāti Mutunga o Wharekauri Iwi Trust