

To The Registrar
Environment Court
Christchurch

1. Yachting New Zealand Incorporated (**YNZ**) wishes to be a party to the following appeal against part of the decision of Marlborough District Council (**Council**) on the Proposed Marlborough Environment Plan (**Proposed Plan**).

Te Runanga o Kaikoura and Te Runanga o Ngai Tahu v Marlborough District Council – ENV-CHC-2020-000046.

2. YNZ made a submission about on the subject matter of the proceeding.
3. YNZ has an interest in the proceedings greater than the general public has as YNZ is the national sports body for competitive and recreational sailing and boating. YNZ represents the needs and interests of over 250-member yacht and boating clubs and class associations. YNZ gets involved at both the central and local government level when environmental and legal issues directly affecting New Zealand’s recreational boat owners and operators are at issue.
4. YNZ is not a trade competitor for the purposes of section 308C or 308CA of the Resource Management Act 1991.
5. YNZ is interested in part of the appeal relating to the Proposed Plan’s marine discharge provisions.
6. In particular YNZ is interested in the following particular issues:

Coastal Marine Zone

- a. The following proposed amendment to Volume 2, Chapter 16 of the Coastal Marine Zone Rule 16.7.5:

Discharge of treated or untreated human sewage ~~from land-based activities~~ into the coastal marine area, except for the discharge of treated human sewage from regionally significant infrastructure.

7. YNZ **opposes** the relief sought because:
- a. The discharge of human sewage from ships¹ is provided for in the Resource Management (Marine Pollution) Regulations and other rules within the MEP;
 - b. The discharge of human sewage from vessels into the coastal marine area is enabled, subject to restrictions in Rules 16.7.3 and 16.7.4;
 - c. Thus, the amendment sought conflicts with other rules in the MEP;
 - d. There is no probative evidence to justify a blanket prohibition on the discharge of human sewage from vessels;
 - e. It does not address the health and safety risks if vessels are required to travel outside the CMA to discharge; and
 - f. The amendment sought does not address the reality of New Zealand's popular maritime cruising and recreation grounds, including Marlborough, which do not have appropriate or sufficient sewage pump out locations to service vessels.
8. YNZ agrees to participate in mediation or other alternative dispute resolution of the proceeding.

¹ As defined – which includes a wide range of recreational vessels, including those of a relatively small size

Signature:

Yachting New Zealand Incorporated by its
authorised agent:



Jeremy Brabant

Date:

17 June 2020

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Advice

If you have any questions about this notice, contact the Environment Court in Christchurch.