

File: REQ.599577

Attention: Malcolm Nicolson

Chief Executive Officer

Northland Regional Council

14 July 2020

Dear Mr Nicholson

Thank you for your response to my letter.

Whilst the contents of your response is clear and concise, it appears to be just another re-establishment of that information that is already out in the public domain and does not address the concerns that I expressed regarding the MPMP and associated charges. For clarity, because the references you quote include bio-security in all spheres, we are discussing specifically those in the marine environment.

My first question was:

Who is responsible for the introduction of pests? You correctly note that hull biofouling is the predominant way in which marine pests are spread and that the majority of vessel movements are recreational vessels. That is surely a given but that does not address the question of responsibility.

Most vessels domiciled in the Bay of Islands (BOI) rarely leave their home waters and when doing so even more rarely stop in one place long enough to gather pests. This is especially true for recreational boats going out of their home waters because heavy hull fouling seriously impairs boat performance and consequently the very dominant number of boats leaving the BOI would be clean and anti-fouled upon departure and would be equally clean upon their return.

From these statements it is easy to deduct that the predominant way that pests are spread is through the movement of visiting boats. You noted that “although both commercial and recreational vessels arrive into Northland, the majority of vessel movements are recreational vessels”. The implication of this statement is that you appear to agree that the pest problem is the result of visiting boats. Whether they are foreign boats or boats from other areas in New Zealand is moot. The fact is, they’re not BOI locals.

My next question was:

Who gets to pay? This was a rhetorical question but you have succinctly confirmed that the people responsible for contaminating our environment are NOT the ones that get to pay. Because the Council has “no efficient way to collect costs” from visiting boats, the victims get to pay.

Foreign yachts contribute nothing and are a very credible conveyor belt for the fresh influx of pests

Aquaculture contributes nothing even though they derive the greatest benefit from the MPMP activity, the apparent control of pests the existence of which is virtually guaranteed to harm their business. The fact that their facilities do not move and thus do not spread pests is a very weak argument indeed.

Business owners as far as I can tell, make no specific contribution to the MPMP fund even though their businesses, like ratepayers, depend almost entirely on the pristine environment of coastal

attractions. The downside of marine pests would play a measured and significant part in the success or not of business in the NRC region.

The port(s) in the region get to pay (well, barely). From a statement issued by NRC's Bio security Manager Marine and Strategy, Kathryn Lister, the ports in NRC's jurisdiction pay just \$5000 per annum to cover all of the commercial shipping entering from foreign regions. I'm not sure what qualifies as a "port" but I cannot conceive of more than three and probably only two (Whangarei, BOI). So commercial shipping is responsible for a relatively paltry sum money and this will include hundreds of arrivals, all eminently capable of introducing fresh levels of harmful pests to our environment.

Cruise liners contribute nothing but, having brought thousands of visitors into BOI, they get a free ride due to the small contribution made by port(s) in the region (see above). Yet the BOI is an attraction leveraged by the cruise lines to the direct benefit/enjoyment of their passengers. To be sure, if they derived no benefit, they would not stop here.

Trailer boats pay nothing. Whilst presenting no risk to MPMP, these boaters also derive benefit from the facilities and pest free environments that NRC claim to be creating. I'm sure that the gathering of contributions to the fund falls well into the too-hard basket mentioned in your response but in reality, a levy is easily collectible from this source. To be fair, they're mostly making a contribution, albeit a tiny one, via their rates account. Mostly they are property owners in Northland.

The ratepayers get to pay a share of 35% of the cost. Whilst this may seem to folks living in Kaikohe or Kaitaia as being unfair, the truth is that the entire region depends on the ecological wellbeing of the environment for financial success mostly strongly driven by coastal attractions, resorts and water-related activities. It should thus not be a surprise nor is it unfair that the ratepayers should have a part in the funding.

Having said that, the majority of boat owners in the NRC region that are subjected to the MPMP levy are also ratepayers. So we get to pay twice – once through a mooring levy and then through our rates bill.

The rates that I personally pay are very high compared to other regions in the North Island. When compared to town-dwelling property owners, I pay rates based on the same value structure as town-based ratepayers in Kerikeri do but receive only a fraction of the benefits. We supply our own water, our own wastewater processing. We have no street lighting, no sidewalks and no kerbside maintenance. While the residents of Kerikeri town are to receive a new \$27m wastewater system as an included part of their (and my) rates, I not only supply my own sewerage treatment system at my cost but I maintain it, run it and have to provide an annual certificate of proper operation to council, all at my own cost.

And now I have a double contribution to pay to run an eco-war that simply cannot be won. You will need to try harder to try and explain the equity of that to me.

Private vessels on moorings and in marina berths get to pay the lion's share. And yet, as with trailer boats, we also present no risk to MPMP. Whilst not an auditable number, the following is my estimate of boats in BOI

Area	Boats	MPMP levy @\$83/boat
Doves Bay Marina	193	16000
Opuia Marina	400	33200
Kerikeri Inlet moorings	682	56600
Matauwahi Bay (Pomare Bay)	124	10300
Russell moorings	47	3900
Pahia, Cherry Bay	108	9000
Okiato	93	7700
Opuia moorings	134	11000
Total		147700

These figures do not include Whangarei, the Tutukaka Marina, Manganui harbour and many other mooring fields in the NRC area. The value of collections from mooring and marina berth owners could well run into half a million dollars a year. When compared to the \$5000 contributed by the ports, this has to be a derisive condition.

Third question:

Who derives benefit? One of the contentious issues is whether or not the contributions we are making is having any effect and are we getting value for money. Is the programme for which we are paying delivering any form of benefit to us?

Marinas in the region will derive benefit from having fanworm controlled so as to not infest their facilities. Popularity of the marinas will be significantly impacted if it became known that the marinas were infested by fanworm. Do they have a levy on them that supports the MPMP initiatives? No they don't.

Councillor Sinclair, the NRC's Deputy Chairman, said: "These pests threaten our incredible coastal playground and its underwater life, including kaimoana. *They also pose considerable risks to our tourism and aquaculture industries.*"

Business operators will derive benefit from the control of fanworm. The pristine surroundings of the BOI are directly responsible for the level of visitors/tourists that fuel all the local businesses in the area. This is particularly true for marine-based industry that to a large degree, are paying tenants occupying council real estate.

Aquaculture derive the greatest benefit from the MPMP activity, the apparent control of pests that are virtually guaranteed to harm their business. Not only do they have a need to keep their farms pest free, they also "export" product from BOI to seed other aquaculture facilities outside of BOI. Contamination here could end up contaminating aquaculture in other areas of NZ that may still be pest-free.

The flip-side to that coin is: **Who does not derive any benefit from MPMP?**

The moored boats and boats in marinas get no benefit from the programme. The very sector that contributes by far the largest portion to the MPMP fund are the ones that benefit very slightly or, mostly, not at all.

By their very nature, these boat owners have to haul their boats on a regular basis to remove marine growth. Failure to do this substantially reduces the performance of boats, whether power or sail, to a point where they are barely usable.

Even the boats that languish interminably on moorings gathering huge levels of marine growth whilst getting very little love from their owners, are **victims** of pest infestation brought on them by visiting boats. If they get pest infestations, it is not their fault.

Certainly from my personal perspective there is no benefit. At my own cost, my boat gets regularly antifouled and cleaned as the performance of the boat is negatively affected by any growth, foreign pests included. This would be true for the vast majority of boat owners moored/berthed in the region.

Even if my boat were to attract fanworm introduced by foreign visiting boats, the problem would be taken care of at my cost. I would have absolutely no hope of any contribution from the MPMP fund in the removal of foreign pests from my boat.

Indeed, facilities that enabled us to keep our boats clean and pest free at little or no cost have been systematically reduced by NRC to a point where the only way that boats can be cleaned is by using the exorbitantly costly facilities provided by FNDC in the Opuia Marina. I believe the last of the tidal grids that made routine cleaning of hulls possible has recently been removed.

How effective is the programme? Are we getting anything for our money?

In June of 2010, MAF Biosecurity NZ called off their program to rid NZ waters of Mediterranean Fanworm based on information that indicated that the pest was already too widespread to be eradicated or even be contained. The conclusion drawn at the time was that “to continue to fund this effort did not add up given the geographical spread of the pest and the high cost of what is a very intensive process to remove them and that the Government therefore has determined that the response to Mediterranean Fanworm be stood down”. And that was ten years ago!

See <https://www.scoop.co.nz/stories/SC1006/S00027/fanworm-pest-elimination-programme-to-close.htm>

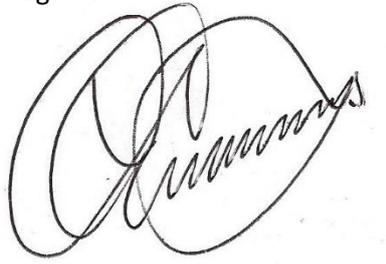
This decision was taken about a control regime of 10,000 hectares. The area just in BOI that NRC is trying to control is nearly three times that size and does not include Whangarei, Tutukaka, Whangaruru, Whangamumu and a dozen or more other anchorages frequented by recreational boaters. Surely at some point NRC must recognise, as MAF did, that this is an unwinnable war.

In the extremely unlikely event that NRC were to eradicate pests like Mediterranean fan worm and visiting boats from abroad and other NZ territories were completely banned, the problem would not exist. That being the case, boat owners domiciled (on moorings or in marina berths) in BOI are actually the victims here, we are not “the bad guys”. It is our boats that are under attack from pests arriving here on visiting boats, we are not the cause of this problem. Why are we the ones carrying the vast bulk of the cost?

So thanks again for your letter but your answers in no way address the inequity that is being foisted upon us by the Northland Regional Council. Since you mention that the most recent schedule was adopted by Council and comes into effect 1 July 2020, it is clear that none of the correspondence from me or any other source has made any difference. The invoice I have recently received from NRC for

the next year of MPMP shows that the levy remains unchanged from 2019 and I believe my response to it will also remain unchanged.

Regards

A handwritten signature in black ink, appearing to read 'Andre Asselbergs', written in a cursive style with a large initial 'A'.

Andre Asselbergs

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