

## Comments

### LTP 2021-31

<b>Comment ID</b>	1182
<b>Response Date</b>	14/04/21 5:33 AM
<b>Status</b>	Submitted
<b>Submission Type</b>	Email
<b>Version</b>	0.2
<b>Files</b>	
<b>First name</b>	Ian
<b>Surname</b>	McFarlane
<b>Email address</b>	
<b>Are you submitting on behalf of an organisation?</b>	Yes, I'm submitting on behalf of an organisation
<b>Which organisation are you submitting on behalf of?</b>	Purau Mooring Association
<b>Which age category are you in?</b>	-
<b>Do you have any further comments on the activities proposed in specific portfolio/s (please select all those you wish to comment on):</b>	
<b>Where do you live in Canterbury? Select your district below:</b>	-
<b>Would you like to see us investing in the following initiatives in your area? Kaikoura</b>	
<b>Would you like to see us investing in the following initiatives in your area? Hurunui</b>	
<b>Would you like to see us investing in the following initiatives in your area? Waimakariri</b>	

**Would you like to see us investing in the following initiatives in your area? Christchurch**

**Would you like to see us investing in the following initiatives in your area? Selwyn**

**Would you like to see us investing in the following initiatives in your area? Ashburton**

**Would you like to see us investing in the following initiatives in your area? Mackenzie**

**Would you like to see us investing in the following initiatives in your area? Timaru**

**Would you like to see us investing in the following initiatives in your area? Waimate**

**Would you like to see us investing in the following initiatives in your area? Waitaki**

**Do you wish to speak to your submission?** Yes

*We may use your phone number to contact you to arrange attendance at a hearing. This information will be kept private.*

**Phone number**

**How did you find out about giving feedback?**

## Purau Mooring Association submission on Environment Canterbury Long Term Plan

April 8, 2021

The PMA has more than 100 members and has been active for about four decades. It offers considerable savings for Ecan as an overseeing group which maintains and inspects moorings.

### Officers

Ian McFarlane chairman  
Larry Burrow secretary  
Doug George treasurer

Chris Hutching deputy treasurer  
Daniel Petrache committee member

### WE WISH TO MAKE A PRESENTATION AND BE HEARD ON THIS SUBMISSION

1/ The Purau Mooring Association (PMA) is deeply concerned about a proposed \$57.50 "...removal of wrecks/abandoned vessels..." levy to be imposed on all swing mooring owners (LTP - Fees and Charges Section. P268).

2/ The harbourmaster has never discussed the matter with the PMA, and members were shocked to learn of this proposal that is deeply buried in the LTP.

3/ The harbourmaster's view that the benefit and risk of wrecks lie with mooring owners is incorrect. He needs to provide examples of wrecks in recent years that came off moorings, rather than some other source.

4/ Removing derelict boats benefits everyone in the region whether they are a mooring owner or not.

5/ Using the same justification for the new levy would make it logical to levy vehicle owners for removal of abandoned cars in riverbeds. Clearly such a proposal could never be imposed. But in this case, the harbourmaster seeks to impose the new levy simply because he can, through Ecan's powers under the Local Government Act.

6/ There are numerous other activities where Ecan carries out actions to improve/tidy the local environment and does not target specific user groups to pay for them.

7/ The new fee comes in the context of a DOUBLING of annual mooring fees last year to \$230, which should cover any perceived requirement for a "wreck levy". There has never been a detailed explanation on what the higher fee has been spent on.

8/ The regional council maintains records of all swing moorings and attached vessels for which mooring owners are already charged a considerable fee, and therefore should be able to readily identify any owners responsible for wrecks.

9/ The council requires vessels to be registered and to display their registration

details. Therefore - how is it that derelict vessel owners are not traceable ?

10/ Removal of derelict vessels must be the responsibility of the administering authority and the vessel owner, not other mooring holders who have no control nor responsibility over abandoned vessels.

11/ Questions –

- How many boats in the past five years have had to be deposited off? How many came off moorings?

- Who paid, and did Ecan try to get the owners to pay for this?

- Why are mooring owners being targeted? Why not all boat users, because wrecked boats may have nothing to do with moorings.

- What if a wreck is owned by a foreign owner who comes to Canterbury?

- Why hasn't the role of insurance been explored further?

- Who pays for removal of rubbish and car wrecks in the region?

- Where will the money from the new levy reside – in a special identifiable account or a general slush fund? Will the money be refunded if it not used?

12/ The “wreck levy” is unfair

Wrecks are not a big problem.

It is an owner's responsibility or the regional authority's, not the responsibility of a specific user group (mooring holders) simply because they also have a mooring.

Ecan has already DOUBLED the mooring fee in the past twelve months, therefore it has already recently enjoyed a significant injection of money from mooring holders for purposes it has never explained.

12/ Remedies if there is a problem with wrecks

- either levy all boat owners or none (including marina berth holders and recreational users of the public slipways).

- require insurance cover for all mooring owners, the vast majority already have it.

- allow PMA to explore blanket insurance cover for its members

- require all new purchasers of moorings to sign a document acknowledging responsibility should their boat sink

13/Summary

The proposed wreck levy is unfair and comes after Ecan last year DOUBLED mooring fees.

Wrecks are seldom a problem around Banks Peninsula, and certainly less problem in areas which have an association such PMA keeping an eye on things.

Boat owners are responsible for their boat safety and Ecan representing is the agency with systems and responsibility to deal with wreck removal on behalf of all rate-payers if owners are not able to for any reason

It is wrong in principle and legally doubtful to tax a small group of boat users on the off-chance that one of the members of that group may create a problem.



