

Michael Dine

From: Laura Horton s 9(2)(a) privacy
Sent: Wednesday, 16 February 2022 9:54 am
To: Permissions Christchurch
Subject: Jet Junkies Marine Mammal Permit Application

Sir/Madam

I was shocked to hear that local jet ski company Jet Junkies has applied for a marine mammal permit, which would allow them to operate jet ski tours around the Lyttelton harbour. As you know, this area is home to many marine mammals, including the vulnerable Hector's dolphin. Noise pollution, habitat disturbance and risk of collisions are of great concern. Please consider our precious wildlife and decline this application.

Laura Horton

s 9(2)(a)
privacy

Michael Dine

From: s 9(2)(a) privacy
Sent: Tuesday, 15 February 2022 11:11 pm
To: Permissions Christchurch
Subject: Submission on Jet Junkies Limited permit application

To Whom it May Concern,

I am writing on behalf of my family (descendants of James Hector) to strongly oppose this application.

Lyttelton Harbour contains a busy international port, and the upper harbour is very shallow. Groups of jet skis are likely to be extremely noisy and stressful for the dolphins – and the aforementioned features of the harbour would surely make it harder for them to avoid groups of jet skis.

Hectors dolphins are a taonga - there are several commercial operators out of Akaroa that already provide the public with paid opportunities to view them. These individual vessels seem more appropriate, and easier for the dolphins to choose to engage with or avoid, than groups of jet skis operated by novices.

Yours sincerely,

Zoe Hector (BSc Hons Marine Ecology)
Ian Hector
Finn Hector

Sent from [Mail](#) for Windows

Michael Dine

From: Mark Belton [REDACTED] s 9(2)(a) privacy
Sent: Tuesday, 15 February 2022 9:58 pm
To: Permissions Christchurch
Subject: Jet Junkies Application

I wish to register my opposition to the application by Jet Junkies to operate a touristic jet ski operation in a Marine Mammal Habitat, namely Lyttelton Harbour.

Key reasons include.

As a resident of Lyttelton Harbour for 45 years and an active sailor for this period I have watched the slow recovery of marine life in the harbour environs, and the slow recovery of harbour's much degraded environmental condition.

One of the most precious creatures in the harbour is Maui Dolphin. Protection and recovery of of its natural habitat, and protection of the dophins from disturbance is of utmost importance.

In particular dolphins should not be exposed to high speed jet ski's operating in their environment.

Lyttelton Harbour is small and precious. The touristic use of jets skis is an intrusive, inane and pointless activity.

It ia requested the application id rejected.

Mark Belton

[REDACTED] s 9(2)(a)
[REDACTED] privacy

Sent from [Mail](#) for Windows

Michael Dine

From: Rachel Jefferies s 9(2)(a) privacy
Sent: Tuesday, 15 February 2022 9:11 pm
To: Permissions Christchurch
Subject: Submission on Jet Junkies Limited permit application

Categories: Red Category

A submission to the Director-General, Department of Conservation

in response to Jet Junkies Limited permit application

Attention: Michael Dine, Permissions Advisor

Dear Ms Nelson,

Thank you for the opportunity to have a say on an application for a marine mammal permit for the purpose of commercial vessel based marine mammal viewing in Lyttelton Harbour and surrounding heads.

Jet Junkies Limited is proposing up to five commercial trips a day, each trip lasting an hour and involving up to three jet skis. The proposed maximum cumulative viewing or contact time per trip is twenty minutes, meaning a daily maximum cumulative viewing or contact time of 1 hour and 40 minutes.

Whakaraupō/Lyttelton Harbour is home to Hector's dolphin. Hector's dolphin are classified by DOC as Nationally Vulnerable: facing high risk of extinction in the medium term. Threats to Hector's dolphin, as listed on the DOC website, include:

- boat strike
- noise
- tourism.

The summer months are the busiest time of the year for tourism. This also coincides with when Hector's dolphin come inshore for breeding and calving. Nursing females need enough time to rest and forage for food. Hector's dolphin have a relatively short lifespan and low reproductive rate.

Jet ski-based marine mammal tours require participants to drive their jet skis to the dolphins, rather than letting the dolphins come to the watercraft.

Educating tourists on Hector's dolphin, or any marine mammal, through harassing them by jet ski is fundamentally flawed. An education programme would only make sense if there were genuine benefits to the dolphins. Jet ski dolphin tourism in Whakaraupō/Lyttelton Harbour is short-term and high risk.

When taking these risk factors, as highlighted by DOC, into consideration, I am unable to support an application for a marine mammal permit for the purpose of commercial vessel based marine mammal viewing in Lyttelton Harbour and surrounding heads.

Rachel Jefferies

Lyttelton

15 February 2022

Michael Dine

From: Alison Westrupp s 9(2)(a) privacy
Sent: Tuesday, 15 February 2022 5:35 pm
To: Permissions Christchurch
Subject: Jet Junkies Mammal

To whom it may concern,

I am opposed to the granting of consent for this purpose.

As distance must be kept from marine mammals, and slow speeds adhered to, I do not believe that this venture will be successful in its pursuits to do the claimed mammal viewing.

I do not believe that this venture will do enough to raise any awareness, or enact any subsequent positive action to improve the plight of our delicate harbour and the endangered creatures that inhabit it

I believe jet ski tours will disrupt remaining peace n the harbour.

For these reasons, I'm strongly opposed to jet ski tours within the harbour.

Regards,
Alison Westrupp

Michael Dine

From: s 9(2)(a) privacy s 9(2)(a) privacy
Sent: Tuesday, 15 February 2022 5:13 pm
To: Permissions Christchurch
Subject: Jet junkies

I believe jet tours would be too noisy going up and down the harbour and cause waves for kayaks who are going across the harbour at a much slower pace.

I am sure the dolphins would also not like the noise and to be followed by jet tours especially if they are in the areas where it is tidal.

What about kayaking with the dolphins instead as in Akaroa and Kiakoura.

Thank you for your time in looking at all proposals.

s 9(2)(a) privacy

Michael Dine

From: Paula **s 9(2)(a) privacy**
Sent: Tuesday, 15 February 2022 4:31 pm
To: Permissions Christchurch
Subject: Jet Junkies Marine Mammal Permit Application

Hello

I am writing to express my deep concerns over Jet Junkies' application for a marine mammal permit. Sound is amplified underwater and the noise alone could drive marine mammals out of the area, in search of safer, quieter habitat. Collisions are also a concern, as marine mammals can surface quickly. Surely, viewing these animals can be done from a quieter, slower vessel than a jet ski? I urge you to decline Jet Junkies' marine mammal permit.

Please decline this application. We, the animal loving public of Aotearoa have only DOC as our representatives in this matter

Kind regards
Paula hanekom

Michael Dine

From: Purita Mok s 9(2)(a) privacy
Sent: Tuesday, 15 February 2022 2:25 pm
To: Permissions Christchurch
Subject: Jet Junkies Marine Mammal Permit Application

Hi there

Sorry this is being sent after the noon deadline today.

I would like to voice my opinion on the marine mammal permit that Jet Junkies has applied for to operate their jet ski tours around the Lyttelton harbour. That harbour is home for many marine mammals who would be negatively affected by jet skis. There would be unnecessary noise and danger to these mammals for the sake of Jet Junkies making a buck.

I urge you to decline this permit application for the protection of these marine mammals.

Thank you for your attention.

Kind regards,
Purita

Michael Dine

From: coyletroy . s 9(2)(a) privacy
Sent: Tuesday, 15 February 2022 2:22 pm
To: Permissions Christchurch
Subject: Jet Junkies Marine Mammal Permit Application

Kia Ora,

I wish to express opposition to the above proposal. The proposed activities are not conducive to protecting the local Hector's dolphin sub-population. For this reason alone, it is important that the proposal is rejected.

Yours Sincerely
Dr Troy Coyle

Michael Dine

From: Nicky Snoyink s 9(2)(a) privacy
Sent: Tuesday, 15 February 2022 12:50 pm
To: Permissions Christchurch
Subject: Forest & Bird Submission Jet Junkies Marine Mammal Permit Application 150222
Attachments: F&B Submission Jet Junkies Marine Mammal Permit Application 150222.pdf

Kia ora,

Please find attached Forest & Bird's submission on the Jet Junkies Marine Mammal Permit application.

Forest & Bird wishes to emphasise the lack of information accompanying this application means that is very difficult for submitters to be informed enough to understand the impacts of the activity or necessary mitigation. We are surprised that the application was publicly notified in the absence of this information.

That aside, thank you for the opportunity to submit.

Kind regards,
Nicky

Royal Forest and Bird Protection
Society of New Zealand Inc.

P O Box 2516
Christchurch
New Zealand

P: 03 940 5522
www.forestandbird.org.nz

15 February 2022

Director-General
Department of Conservation
Private Bag 4715
Christchurch 8140

BY EMAIL: permissionschristchurch@doc.govt.nz

Tena koe,

Re: Submission on Jet Junkies Limited Marine Mammal permit application

Thank you for the opportunity to submit on the Jet Junkies Marine Mammal permit application.

Forest & Bird does not support this application and request that it be declined for the following reasons.

- Application does not satisfy Marine Mammals Protection Act 1992
- Impact on threatened species
- Noise, disturbance and cumulative effect
- Regenerative tourism

Marine Mammals Protection Act 1992

1. Marine mammal permits are regulated under the Marine Mammals Protection Act 1992. The purpose of this Act is to provide for the protection, conservation and management of marine mammals and, in particular to regulate human behaviour and contact with marine mammals to prevent adverse effects on and interference with marine mammals.
2. The decision making criteria for this application are set out in section 6 of the Act. The activity should not be contrary to the purposes and provisions of the Act, general policy statements, and conservation management strategies approved under section 3C of the Act. The activity should not have any significant adverse effect on the behavioural patterns of the marine mammals. Among outlining conservation and educational commitments, the application also needs to set out the operator's relevant experience regarding contact with marine mammals and working in the physical environment, of which sufficient knowledge needs to be demonstrated.
3. Given the lack of information supplied with the application it is not clear to Forest & Bird how many or any of these criteria will be met. On that basis the application should be declined.

4. Furthermore a raft of policy exists detailing the threat status of Hector's Dolphin in particular and the measures to protect them, as well as research into the effects of noise and disturbance of anthropogenic activities on marine mammals. This is summarised detailed below in this submission.
5. Forest & Bird believe that the activity by virtue of the use of motorised personal watercraft (jetskis) and the potential for adverse effects on marine mammals, it is contrary to the purposes and provisions of the Act.

Impact on threatened species

6. Hector's dolphins are nationally endangered. Found only in New Zealand waters, throughout the country they are subject to many anthropogenic pressures and further threats as a result of climate change.

7. The Department of Conservation's (DOC) Hector's dolphins webpage states:

...the best available evidence indicates that this subspecies is considered to be facing a very high risk of extinction in the wild.¹

8. Policy 1.5.11 of the Canterbury Waitaha Conservation Management Strategy (CMS) states:

The diversity of New Zealand's natural heritage is maintained and restored with priority given to:

c) conserving threatened and at-risk species to ensure persistence, with an emphasis on those listed in Appendix 5.²

The CMS Appendix 5 identifies a list of threatened and at-risk indigenous flora and fauna present in Canterbury (Waitaha) and includes Hector's Dolphin.

9. Te Mana o te Taiao, the New Zealand Biodiversity strategy has this 2050 outcome for indigenous species

All indigenous species are protected and secure, and none are at risk of extinction due to human activities.³

10. Furthermore, the Lyttleton Harbour is part of the Banks Peninsula Marine Mammal Sanctuary. The purpose of the Sanctuary is to protect the endangered Hector's dolphin from bycatch in set nets.⁴

11. As a threatened species living within a marine mammal sanctuary, the welfare of Hector's dolphins is a national priority, and their protection is paramount. Based on this, activities that potentially increase the risk of extinction should be avoided.

12. The absence of supporting evidence to justify consistency with conservation policy objectives suggests the application should be declined.

¹ [Draft Hector's and Māui dolphin Threat Management Plan: Marine mammals \(doc.govt.nz\)](#)

² Canterbury Waitaha Conservation Management Strategy

³ Te Mana o Te Taiao Outcome 2 Page 43

⁴ [Horomaka/Banks Peninsula Marine Mammal Sanctuary: Marine protected areas \(doc.govt.nz\)](#)

Noise, disturbance and cumulative effect

13. The DOC webpage goes on to state:

Public and government concern over the effect of human induced mortality on Hector's and Māui dolphin has led to the development of a draft Threat Management Plan to help protect these species.

14. The Threat Management Plan (TMP) is under review. The proposed overarching objective of the TMP is to:

Ensure adverse effects on dolphins from other human-induced threats are avoided or minimised.

15. The TMP identifies injury, disease, disturbance, noise, habitat modification, impacts on prey distribution and abundance, reduced foraging success, displacement, and habitat fragmentation as key threats to dolphins.⁵ Boat strike presents an additional risk.

16. The Lyttleton Harbour Hector's dolphin population face a significant number of anthropogenic threats from busy harbour activities.⁶ Concern for the impact of noise and disturbance on dolphins in Lyttleton Harbour has been regularly reported on in the media.⁷

17. The noise and disturbance level to the dolphins is likely exacerbated by the accessibility of their Lyttleton Harbour dolphin habitat to a range of other commercial and recreational marine activities.

18. Forest & Bird are concerned that the cumulative effect, particularly the noise effect of the proposed activity in addition to existing noise and disturbance is real, and if permitted would not be consistent with the Act.

19. Erbe et al. (2018) explain that

*Underwater noise can interfere with key life functions of marine mammals (e.g., foraging, mating, nursing, resting, migrating) by impairing hearing sensitivity, masking acoustic signals, eliciting behavioral responses, or causing physiological stress.*⁸

New data demonstrate how noise from small vessels can impact underwater soundscapes and how marine animals will have to adapt to ever-growing noise pollution.⁹

Forest & Bird strongly encourage the Department to consider this research in its decision making process for this application.

⁵ Protecting Hector's and Maui Dolphins Discussion Paper June 2019 Page 11

⁶ [Lyttelton Port development may affect endangered Hector's dolphin | Stuff.co.nz](#) and [Lyttelton cruise berth not 'dolphin-friendly' » METRONEWS](#)

⁷ [Concern for Hector's dolphins during Lyttelton Port berth construction | Stuff.co.nz](#) and [Jet ski dolphin tours plan for Canterbury harbour prompts environmental concerns | Stuff.co.nz](#)

⁸ Erbe, Christine & Dunlop, Rebecca & Dolman, Sarah. (2018). Effects of Noise on Marine Mammals. 10.1007/978-1-4939-8574-6_10.

⁹ Pine, Mathew et al. (2021) A Gulf in Lockdown: how an enforced ban on recreational vessels increased dolphin and fish communication ranges

Regenerative tourism

20. Before the pandemic, a report by the Parliamentary Commissioner of the Environment (PCE) examined the impacts of tourism on New Zealand's people and environment.¹⁰

The PCE concluded that

*If the current policy framework were to stay the same, the industry – and New Zealand as a whole – could confront a range of social, cultural and environmental impacts we might regret.*¹¹

21. The subsequent border closure in March 2020 would go on to have a devastating impact on the tourism industry, particularly those relying on international tourism. Recognising the vulnerability of New Zealand tourism and considering the PCE's conclusion, post COVID-19 the Ministry for Business innovation and Employment (MBIE) seized the opportunity to re-set the tourism industry.
22. MBIE established the tourism task force and embarked on an exploratory process involving a broad range of stakeholders, ultimately producing a report with recommendations to Government on how a reimagined tourism should look meant.¹² Forest & Bird participated in this process.
23. Overwhelmingly, participants agreed that the protecting and restoring the natural environment was fundamental to a regenerative tourism industry. Central to the taskforce's sentiment was that like all industries, tourism needed to evolve so that short-term financial benefits do not come at the expense of the planet or the cultural or community well-being over the longer term.¹³
24. While Forest & Bird acknowledges the applicants willingness to advocate for the marine environment and educate jet ski users about life as a cetacean in the Banks Peninsula Marine Mammal Sanctuary, we consider the activity fundamentally at odds with desired future state of tourism, and in particular marine based tourism and the desire to protect one of Aotearoa New Zealand's most charismatic marine species.
25. Furthermore, during the course of researching information for this submission it is recognised that the Regional Coastal Plan for the Canterbury Region (2005) overdue for review. In the 2005 version, it is recorded that
- Environment Canterbury will liaise with organised user groups to investigate locations where activities with potentially adverse effects, for example jetskis, may operate.*¹⁴
26. It is unclear to what extent this has occurred. Aligning the Resource Management Act framework with the Conservation framework is now urgent to ensure that the Banks Peninsula Hector's dolphin population is protected and secure, and that it is no longer at risk of extinction due to human activities.

¹⁰ [report-pristine-popular-imperilled.pdf \(pce.parliament.nz\)](#)

¹¹ Report Pristine, Popular, Imperilled PCE Page 7

¹² [The Tourism Futures Taskforce interim report – December 2020 \(mbie.govt.nz\)](#)

¹³ [The Tourism Futures Taskforce interim report – December 2020 \(mbie.govt.nz\)](#) Page 97

¹⁴ [Regional Coastal Environment Plan for the Canterbury Region | Environment Canterbury](#) Page 77

Decision sought

For the reasons in this submission, Forest & Bird requests that the Jet Junkies Marine Mammal permit application be declined in its entirety.

Thanks for the opportunity to submit.

Nāku noa, nā

Nicky Snoyink

Royal Forest and Bird Protection Society of New Zealand Inc.

Regional Conservation Manager Canterbury/West Coast

Email: **s 9(2)(a) privacy**

Michael Dine

From: Reuben Davidson [s 9(2)(a) privacy]
Sent: Tuesday, 15 February 2022 11:32 am
To: Permissions Christchurch
Subject: Submission on Jet Junkies Limited permit application

Kia ora

I would like to make a submission on the permit application made by Jet Junkies for Whakaraupo/Lyttelton Harbour.

I am objecting to the application on the following grounds.

- **Environmental**
Our focus should be on the care, protection and enhancement of the harbour and bays for our endemic species. The proposed activity will see a marked increase by inexperienced operators (ie. the public) using high powered equipment they are not familiar with. This poses an unacceptable risk for marine life, much of which is endangered. Tourism activities such as this are much better operated by qualified professionals who would be accountable to DOC and other relevant authorities (eg. A mutli-passenger watercraft)
- **Consultation with Runanga**
The application seems to show a superficial attempt to engage with hapu and iwi by way of emails sent to addresses available. I would expect an application such as this to demonstrate meaningful engagement with Runanga and ideally a letter of support or formal partnership agreement that demonstrates whakawhanaungatanga and a plan for the respect and care of taonga species.
- **Community engagement**
There appears to have been no consultation with the various communities that will be affected. Given the proactive and engaged nature of the local residents around Lyttelton Harbour I think this is a missed opportunity and I'd expect any existing operator proposing new activity on this scale to do more using the many accessible forums available via social media and multiple local publications.

I would conclude by saying that I support innovative business and environmentally responsible operators that can enhance our shared environment through careful and considered operations. The proposal I have seen doesn't leave me feeling confident this is the case for the Jet Junkies activity at this time.

I am happy to provide further comment or discussion if required.

Nga mihi

Reuben Davidson

[s 9(2)(a) privacy]

Michael Dine

From: Jennie and Joel Watkins s 9(2)(a) privacy
Sent: Tuesday, 15 February 2022 10:32 am
To: Permissions Christchurch
Subject: Permit request - Jet Junkies dolphin tours - Banks Peninsula

Hi there,

I would like to raise an objection to the request by Jet Junkies that dolphin tours be a permitted activity in or around Lyttelton Harbour.

The Hector's dolphin population is endangered and needs protecting. Commercial jetski tours are highly likely to cause a nuisance (or worse) to the dolphin population and further threaten the viability of what is a small but very important local population.

Jetski tours should therefore not be a permitted activity and accordingly this request should be declined.

Best regards,
Joel Watkins

s 9(2)(a)

Michael Dine

From: Francesca Hilbron s 9(2)(a) privacy
Sent: Monday, 14 February 2022 11:05 pm
To: Permissions Christchurch
Subject: Jet Junkies Marine Mammal Permit Application

Tēnā koe and thank you for the opportunity to make this submission against the application by Jet Junkies to run jet ski tours to view marine mammals in Lyttleton Harbour.

Allowing people to actively seek out marine mammals including New Zealand's rarest and endangered dolphins, without any evidence of experience, knowledge and expertise of marine mammals and their needs, does not, in my view, fit with the Department of Conservation's policy of ensuring "human interactions with marine mammals and other protected species are managed to avoid or minimise adverse effects on populations and individuals".

I do not accept that spending time operating jet skis and boats constitutes experience with marine mammals as Jet Junkies implies. I do not see any evidence that the operator and their staff has sufficient evidence of experience with marine mammals other than the operator completing a DOC course. I can only assume the course was completed to satisfy their application given there is no evidence the company or staff have been involved in marine mammal conservation to date. The company has until now focused on giving thrill-seekers fun on craft designed for speed and entertainment. Their submission, social media presence and website provide no evidence they are interested in promoting conservation or delivering tours primarily for marine mammal education as the CEO has stated. It would seem to me that this is simply an opportunity for Jet Junkies to attract more customers, extend the ocean area for its jet ski tours, and ultimately increase its profit.

Jet Junkies promotes itself as a company that "provides on the water adrenaline fuelled entertainment". It's a company that promotes "fast family action on the water" and is clearly aimed at thrill seekers. This is not a natural fit with conservation and while there have been improvements in the design of jet skis and other similar craft in terms of noise and fuel pollution, their vibrations at least will be disturbing to marine life. One study at least has also indicated that animals move deeper into the water when approached by personal water craft. So in effect, people on jet skis will be chasing these animals who will be trying to avoid drowning in noise.

It would not be helpful to the wildlife to allow Jet Junkies to prove themselves, thereby opening the door to increased human interaction and noise. There are sufficient opportunities for humans to get up close to marine mammals with existing commercial providers. We can also learn about these species and our role in protecting them in other ways and we should not believe that the only way to develop compassion and caring for them is by satisfying our desire to get close. Seeing them in their natural environment only serves to change that environment by putting more humans in it.

It is very hard to imagine that people will want to pay to ride a jet ski, a noisy machine designed for speed and thrills, only to go at 'idle' speed, seeking out marine mammals. It is also very hard to imagine that people will be paying to ride a jet ski without the expectation of getting close to an endangered Hector's dolphin given they already much closer to the water than if they were in a larger boat - that is getting much closer than the required 50m distance or 200m distance when the mammals have calves. People will want to get as close as they can. And no doubt it will be much more difficult to manage separate thrill seekers on their individual craft, and despite Jet Junkies promising to take any action against those who break the rules, the damage to the animals will already have been done.

Please consider the marine mammals in this submission from Jet Junkies and the real intent behind what this company wants to achieve. This is not about conservation or education. Nothing in this company's submission or background or business demonstrates that what they now want to do is in the interests of conservation management or protection of marine mammals. It is about using marine mammals to attract more custom for the company's core business of thrill-seeker adrenaline pumping water activities at the expense of what's in the best interest of our wildlife. It will compound issues already impacting mammals including fishing, shipping and aquaculture and I am sure that if Jet Junkies were to be successful, in time they would want to increase their tour numbers as the income generated will be far too attractive.

Ngā mihi

Francesca Hilbron

Michael Dine

From: mareile stoppel s 9(2)(a) privacy
Sent: Monday, 14 February 2022 7:56 pm
To: Permissions Christchurch
Subject: opposition against the Jet Boat Junkie application

To whom it may concern,

I hereby strongly voice my objection against this application.

Jet skis are loud and fast and cause marine mammals to move away, they are not compatible at close range in a marine environment.

To pursue mammals, as you would in a commercial operation, is not in the interest of the protection of Hector's dolphins.

To state the obvious, parts of Banks Peninsula are a Marine Reserve and it is our communal responsibility to prevent noise, pollution and encroachment even in areas adjacent to the zoned reserves.

Jet skis operate and are driven by groups of individuals. It will be very difficult to communicate within, monitor or even control such a group to adhere to marine mammal protective legislation.

Looking forward to your reply

Kind Regards

Mareile Stoppel

Michael Dine

From: Quentin McDonald s 9(2)(a) privacy
Sent: Monday, 14 February 2022 7:36 pm
To: Permissions Christchurch
Subject: Jet Junkies Marine Mammal Permit Application

Kia ora,

I am writing as a regular resident of Diamond Harbour with respect to the application by Jet Junkies for a Marine Mammal Permit. Despite being opposite a working port we have observed that jetskis are by far the noisiest vessels in the harbour. We often see Hector's dolphins from our place and they are clearly sensitive as disappear quickly if disturbed. I don't think that up to five jetskis intruding on these beautiful and endangered creatures can do anything but further risk them. Therefore I would suggest this application is not approved as there is little value to this proposal.

Quentin McDonald

s 9(2)(a)
privacy

Michael Dine

From: carolinehb s 9(2)(a) privacy
Sent: Monday, 14 February 2022 7:07 pm
To: Permissions Christchurch
Subject: Jet Junkies Marine Mammal Permit Application

I was shocked to hear of this potential business going ahead with their jetski tours. Please do not allow it to happen. It is terrible for the dolphins and other marine life that live there, threatening their habit and themselves. It is their home, not ours to destroy.

Yours sincerely
Caroline

Sent with [ProtonMail](#) Secure Email.

Michael Dine

From: Skye Broberg s 9(2)(a) privacy
Sent: Monday, 14 February 2022 5:47 pm
To: Permissions Christchurch
Subject: Re: Application for Jet Junkies Ltd, in Lytteton Harbour

Attn: Director-General,

The Marine Mammal permit submitted by Jet Junkies four Lyttelton Harbour tours of the Dolphin's habitat seems counterintuitive to their well-being. I wish to oppose this business venture.

Not only are jet-ski's an audio irritation to those on land, but also to those underwater. As an experienced SCUBA diver I am well aware of the noise levels of jet-skis underwater, and as a bay dweller, also aware of their noise delivery above. Nothing ruins a day at the bay more than the ongoing droning sound of jet-skis, allowing a small few to enjoy the ride, whilst the majority of creatures in their sound zone will be irritated, at best. It is well known that underwater noise can disrupt dolphins' ability to navigate and communicate. Cetaceans are also negatively affected by such noises.

I would imagine that the peak season for Jet Junkies would be over the summer holiday season when Hector's Dolphins move inshore for calving, a time when they should be disturbed as little as possible and the calves are vulnerable to watercraft accidents.

Even DOC has called on jetski users to stop harassing Hector's dolphins around the Banks Peninsula, which has been classified as a sanctuary for these aquatic creatures. Jet Junkies' plan is to find and essentially 'harass' those vulnerable dolphins. Studies have shown that jet skis have a more dramatic effect on dolphins than motorboats, more often affecting a change in behavior, or change in direction (Ref 1). This is direct interference in the dolphin's daily lives. Lyttelton Harbour is already regularly flooded with underwater noise, do we really need to expand that into the greater bay area on a regular basis? This is directly compromising the comfort of the said sanctuary with additional noise pollution taken directly to the dolphins.

As an aside, Australian states QLD, NSW and VIC have rules that state you must not go within 300m of dolphins or whales in an effort to protect both the dolphins and humans. (Ref 2.)

For a small few to make a monetary profit, at the expense of the livelihood of an already endangered animal, is too high a price to pay. Jet Junkies will not enhance the lives of the marine creatures, but only enhance the issues they already face to live in a world increasingly dominated and contaminated by humans. Let's do right by the dolphins and leave them to live their lives without additional invasion and noise pollution.

References:

1. https://www.researchgate.net/publication/255649209_Effects_of_Boat_Activity_on_the_Behavior_of_Bottlenose_Dolphins_Tursiops_truncatus_in_Waters_Surrounding_Hilton_Head_Island_South_Carolina
2. <https://watercraftzone.com.au/jet-ski-rules-dolphins-whales-nsw-qld-vic-australia/>

Skye Broberg

Michael Dine

From: nirdosh nirdosh **s 9(2)(a) privacy**
Sent: Monday, 14 February 2022 5:17 pm
To: Mareile Sweetheart; Permissions Christchurch
Subject: Very strong objection to the application to Chase Hector Dolphins with jet skis

To whom it may concern,

I hereby voice my strong objection to allowing this application.

Jet skis and marine mammals are simply not compatible and especially when the subject is a Hector Dolphin.

To pursue mammals, as you would in a commercial operation designed to pursue, is not in the interest of the protection of Hectors dolphins.

Areas of Banks Peninsula are designated Marine Reserve and we have a real and urgent responsibility to support all of these challenged mammals by preventing noise, pollution, pursuit and possible injury by these fast moving vessels.

It would be very difficult to police, monitor or exercise any significant control over the random groups of Jet Ski drivers who would be drawn to think they have permission to harass Hector Dolphins and subsequently other Marine Mammals.

Considering the very fragile nature of our marine environment I am shocked that this issue is even up for discussion. I look forward to your reply

Kind Regards. Nirdosh (aka Ian Brown)

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s 9(2)(a) privacy

Michael Dine

From: Christine Rose **s 9(2)(a) privacy**
Sent: Monday, 14 February 2022 4:45 pm
To: Permissions Christchurch
Subject: Jet-ski Junkies application for Hector's dolphin tours
Attachments: Hector's dolphins Lyttelton - Jetski Junkies.docx

Hi,
Please find attached, a submission to the proposed Hector's dolphin jet-ski tours from Jet-ski Junkies, from Māui and Hector's Dolphin Defenders and Sea Shepherd NZ.

Thanks

Christine Rose

Māui & Hector's Dolphin Defenders

and

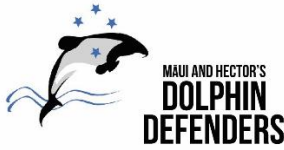
Michael Lawry

Sea Shepherd New Zealand

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find me on:

s 9(2)(a) privacy



355 Foster Rd
RD1
Kumeu 0891

Email: permissionschristchurch@doc.govt.nz

Re: Jet-ski Junkies Application for Hector's Dolphins Marine Mammal Permit, combined submission from Māui and Hector's Dolphin Defenders and Sea Shepherd New Zealand

Māui and Hector's Dolphin Defenders NZ Inc is a long-standing non-profit organisation dedicated to improving the population status and individual welfare of these taonga animals. We carry out advocacy, educational and community engagement, and support research, knowledge and protection for this valued species.

Sea Shepherd New Zealand is a non-profit conservation organisation whose mission is to end the destruction of habitat and slaughter of wildlife in the world's oceans in order to conserve and protect ecosystems and species. Sea Shepherd uses innovative direct-action tactics to investigate, document and take action when necessary to expose and confront illegal activities in the oceans. By safeguarding the biodiversity of our delicately balanced oceanic ecosystems, Sea Shepherd works to ensure their survival for future generations.

Thank you for the opportunity to submit on the application by Jet-ski Junkies for tours in Lyttelton Harbour's Hector's dolphin habitat, additional to their current jet-ski operations.

The Māui and Hector's Threat Management Plan 2020 requires agencies to 'Ensure that adverse effects on the dolphins from (other than fishing) human-induced threats are avoided or minimised.' Therefore, this application should be declined.

There are only about 100 Hector's dolphins who frequent Lyttelton harbour and surrounding bays, and there can be 20 in Lyttelton at any one time. That means there's a high concentration of impact and risk from existing industrial, recreational and tourism activities and pollution, on just a few animals. The cumulative effects of the wide range of past and present industrial activities are already significant for the local Hector's dolphins. Because of the dolphins' vulnerability, collectively and individually, **all** threats need to be actively reduced, rather than increased. The Department of Conservation and Jet-ski Junkies should also **specifically** work together to address risks to Hector's from current tour operations, rather than approving more.

Videos on the Jet-ski Junkies website show what appear to be typical jet-ski behaviour. Vehicles are moving fast, unpredictably, and without ability to detect or respond appropriately to Hector's presence, putting the dolphins at risk of boat strike, noise and other disturbance.

We realise that Jet-ski Junkies' clients probably already encounter Hector's dolphins. That is where the opportunity lies to educate clients about the dolphins and the risks they face, not through a whole raft of new impacts from increased tours.

Some of our specific concerns are:

- The application says, 'marine mammals will not be disturbed or harassed', and that they 'shall not make loud or disturbing noises around cetaceans' but this is exactly what the application is for and what jet-skis do.
- A significant risk for Hector's dolphins in busy harbour environments is from boat strike which this will add to.
- The application's proposed series of five tour opportunities a day, will apply sustained pressure on the dolphins throughout the day.
- Evidence shows how tourism activities can affect dolphin resting, feeding, socialisation and breeding, to cause localised population collapse. DoC should develop a management plan to ensure the range of effects facing Hector's in Lyttelton Harbour are reduced, and not add to these harms, by approving additional jet-ski tours.

In conclusion, there should be active management to reduce the pressures on Hector's in Lyttelton harbour, rather than to increase it. To be consistent with the Threat Management Plan, other biodiversity objectives, and public expectations about the protection of Hector's dolphins, this application should be declined.

We would welcome the opportunity to speak to this submission.

Thank you,

Yours sincerely

Christine Rose

Chair

Māui and Hector's Dolphin Defenders

Michael Lawry

Managing Director

Sea shepherd New Zealand

Michael Dine

From: toni jones **s 9(2)(a) privacy**
Sent: Monday, 14 February 2022 4:31 pm
To: Permissions Christchurch
Subject: Application by Jet Junkies for Marine Mammal Tours permit.

Kia ora

We seek that the application for a Marine Mammal Tours permit by Jet Junkies is declined.

Our reasons for this are as follows:

The ill-effects of watercraft noise on marine mammals is well-documented.

Hector's dolphins are at risk. Lyttelton Harbour is part of the Banks Peninsula Marine Mammal Sanctuary. Activities which have a detrimental effect on the dolphins and exacerbate the risk of their extinction should be banned.

As residents of Lyttelton, well aware of the noise pollution caused by jet skis in the harbour, we are alarmed to hear that the Jet Junkies proposal is being considered.

We are hopeful that organisations with a clearer understanding of the threat to marine life and the resources to provide information to substantiate this will make fuller submissions, however as concerned locals who are extremely worried about Jet Junkies' proposal we want to make you aware of our opposition.

Ngā mihi nui

Tony Geddes and Toni Jones

**s 9(2)(a)
privacy**

Michael Dine

From: William Carome s 9(2)(a) privacy
Sent: Monday, 14 February 2022 3:44 pm
To: Permissions Christchurch
Subject: Submission on Jet Junkies Limited permit application
Attachments: William Carome Submission on Jet Junkies Limited permit application.pdf

Kia ora,

I hope this email finds you well and I want to thank you for the work that you do.

My name is Will Carome and I am a recent MSc graduate from the University of Otago. I conducted research examining the relationship between vessels and Hector's dolphins at Akaroa Harbour and have extensive experience working with dolphins around Banks Peninsula.

I have attached my brief submission below and urge you to at least read the abstracts of both [my](#) and [Emmanuelle Martinez's](#) theses before making any decisions regarding granting additional marine mammal permits for this population. It is entirely inconsistent with scientific evidence for a jet ski operator to be granted a permit to view Hector's dolphins. I hope I have made this clear in my submission and that you will carefully consider what I and others have put forward.

Sincerely,

Will Carome

--

William Carome
MSc | Marine Mammal Research Group
Department of Marine Science
University of Otago, Dunedin, New Zealand

s 9(2)(a) privacy

Director-General
New Zealand Department of Conservation | Te Papa Atawhai

Attention: Michael Dine, Permissions Advisor

Dear Mr. Dine,

I hope you are well and that this brief submission is helpful in your processing of the application for a marine mammal viewing permit made by Jet Junkies Limited.

My name is Will Carome and I have spent the better part of the last two years examining the relationship between tourism and Hector's dolphins for my MSc thesis at the University of Otago. It would be entirely inconsistent with the scientific evidence for a permit to be granted to Jet Junkies Limited to view Hector's dolphins. Indeed, it would be best for their operation to be limited to only the inner harbour of Lyttelton, where they are less likely to inadvertently interact with Hector's dolphins (Brough et al., 2020).

Hector's dolphins are exposed to a range of impacts at Lyttelton, including underwater noise produced from port activities (e.g., Leunissen et al., 2018; 2019) and heavy shipping traffic, and around Banks Peninsula, including fishing (e.g., Rayment and Webster, 2008) and dolphin tourism (Nichols et al., 2001; Martinez, 2010, 2011; Carome, 2021). Extreme care is needed to minimise human impact on this endangered (Reeves et al., 2013) and endemic species. The cumulative impact of all human activity must be considered when assessing additional permitting to view or swim with these 'kiwis of the sea.'

My research showed clear and obvious impacts of vessels on Hector's dolphins within Akaroa Harbour. Specifically, high levels of motorised recreational vessel traffic, cruise ship presence, and (importantly) high levels of dolphin tourism were correlated with reduced dolphin presence in core habitat (Carome, 2021). While dolphin tourism can provide education and foster care for this endangered species, we have long known that vessels significantly disrupt the normal behaviour patterns of Hector's dolphins (Bejder et al., 1999; Nichols et al., 2001; Martinez et al., 2010, 2011). The addition of a dolphin tour operator at Lyttelton is, at best, likely to have a significant adverse effect on the behavioural patterns of Hector's dolphins and, at worst, presents a substantial risk of deadly boat strike to dolphins in the harbour.

Although not a specific focus of my research, I have observed dolphins being harassed by jet skis on numerous occasions. As you will see in the report, Martinez et al. (2010) found that jet skis were more than twice as likely to manoeuvre illegally around dolphins compared to other vessels. Jet skis can manoeuvre unpredictably and are relatively quiet underwater, making it challenging for dolphins to detect avoid them. It is my scientifically informed opinion that there should be no additional permits granted to view Hector's dolphins nationwide, particularly those allowing untrained skippers to approach dolphins from jet skis. I hope you will consider this submission and carefully assess the scientific evidence in making your decision.

Sincerely,

Will Carome

MSc | Marine Mammal Research Group
Department of Marine Science
University of Otago

Literature Cited:

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Michael Dine

From: Beatrice Cheer **s 9(2)(a) privacy**
Sent: Monday, 14 February 2022 2:53 pm
To: Permissions Christchurch
Subject: Jet Junkies Marine Mammal Permit Application

Hello,

I am writing to express my serious concern that the jet ski company Jet Junkies is intending to harass Hector's Dolphins in Lyttelton Harbour and I would like you to decline their application for a marine mammal permit.

Animals like this need to come up for air regularly and how can the jet skis avoid hitting them or getting too close? Jet skis move very quickly and could be frightening to the animals as well as incredibly noisy. I believe the sound travels or is amplified under water so this will make the situation worse. The dolphins may be unable to communicate with each other and in particular, their young.

The company state they will have up to 5 jet skis on each trip - in my experience, even 1 jet ski creates an incredible amount of noise. What is the noise rating for these vehicles and how does that compare with the noise levels tolerated by Hector's dolphins?

Their application states they will remain 300 metres from the animals...how is that possible? The dolphins surface randomly and suddenly. And jet skis move very quickly. I cannot imagine they could stay 300 metres away and still get a good look at them.


I am lucky enough to live in Diamond harbour and can from time to time see Hector's Dolphins from my home which is wonderful. The opportunities to view them from a quiet spot onshore, or from a slow and quiet moving vessel like a yacht already exist so why do noisy and aggressive jet skis need to be included where they might injure the dolphins or harass them in such a way that they may leave the harbour? These are endangered animals and it is DOC's role to protect them.

Please decline Jet Junkies application for a marine mammal permit.

Kind regards,

--

Beatrice Cheer
s 9(2)(a) privacy



Michael Dine

From: Judy Erasmuson s 9(2)(a) privacy
Sent: Monday, 14 February 2022 2:27 pm
To: Permissions Christchurch
Subject: Jet ski tours

You have got to be kidding me. Jet skis and endangered marine life are mutually exclusive. If this goes ahead it will shock and dismay myself and the public. Some common sense please.

Judy Erasmuson
s 9(2)(a) privacy

Michael Dine

From: Sylvia Mills s 9(2)(a) privacy
Sent: Monday, 14 February 2022 1:01 pm
To: Permissions Christchurch
Subject: Jet Junkies Marine Mammal Permit Application

To Whom it May Concern:

I was shocked to hear that local jet ski company Jet Junkies has applied for a marine mammal permit, which would allow them to operate jet ski tours around the Lyttelton harbour. As you know, this area is home to many marine mammals, including the vulnerable Hector's dolphin. Noise pollution, habitat disturbance and risk of collisions are of great concern. Please consider our precious wildlife and decline this application.

Sincerely,

Sylvia Mills

Sent from my iPhone

Michael Dine

From: s 9(2)(a) privacy
Sent: Monday, 14 February 2022 12:28 pm
To: Permissions Christchurch
Subject: Submission on Jet Junkies Limited permit application

Kia ora,

Please accept my disapproval for this application.

The cost v benefit of bringing commercial jet ski tours into the harbour has disproportionate harmful impacts for local residents, both those that live in and out of the water. Currently, there is minimal noise pollution in the area - and it's very much noticed when there are one or two jet skis out on the water over a long-weekend holiday - the noise reverberates throughout the basin and many people have no choice but to endure this for one person's gain. I can't imagine up to the five tours per day with a 5-year license requested....

Let's leave our harbour with the level of development it currently has - a rich resource for all to enjoy with the right mix of commercial activity in its current form. Compromise that - for what - impact and gain for who?

Thanks,

s 9(2)(a)
privacy

Michael Dine

From: Kirsten Taylor s 9(2)(a) privacy
Sent: Monday, 14 February 2022 11:59 am
To: Permissions Christchurch
Subject: Jet Junkies Marine Mammal Permit Application

Dear DOC,

I am deeply concerned that our local marine animals will be disturbed and even harmed if a marine mammal permit is granted to Jet Junkies.

Who will police these jet ski tours to ensure they aren't using excessive speed or getting too close to wildlife? Dolphins, seals and whales can all surface without warning and could be injured by the jet skis. Not to mention the amplified sound under the water, which could disrupt communication and cause stress and fear to wildlife. Please consider the animals first when making your decision.

Kirsten

Michael Dine

From: Clean Walk s 9(2)(a) privacy
Sent: Monday, 14 February 2022 11:18 am
To: Permissions Christchurch
Subject: Jet Junkies Marine Mammal Permit Application

Kia ora

I am writing to express my deep concerns over Jet Junkies' application for a marine mammal permit. Sound is amplified underwater and the noise alone could drive marine mammals out of the area, in search of safer, quieter habitat. Collisions are also a concern, as marine mammals can surface quickly. Surely, viewing these animals can be done from a quieter, slower vessel than a jet ski? I urge you to decline Jet Junkies' marine mammal permit.

Thanks
Abtin

Michael Dine

From: Paul Milligan **s 9(2)(a) privacy**
Sent: Monday, 14 February 2022 10:24 am
To: Permissions Christchurch
Subject: Submission on Jet Junkies Limited permit application
Attachments: JetJunkies_BC Submission.pdf

Attention: Michael Dine, Permissions Advisor

Please find attached a submission from Black Cat Group on the application for a Marine Mammal Permit for Jet Junkies.

Regards,

Paul Milligan
Chief Executive

s 9(2)(a) privacy
s 9(2)(a) privacy
s 9(2)(a) privacy

P: PO Box 80, Lyttelton 8841
A: Level 1, Harbourside House,
5 Norwich Quay, Lyttelton



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Director-General
Department of Conservation
Christchurch Shared Services
Private Bag 4715
Christchurch Mail Centre
Christchurch 8140

Attention: Michael Dine, Permissions Advisor

Re: Jet Junkies Marine Mammal Permit Application

Dear Michael,

Introduction

Black Cat Group wish to submit on the abovementioned application for a new Marine Mammal Permit in Lyttelton Harbour. Black Cat were the first to offer wildlife cruises in Banks Peninsula, starting in Akaroa in 1985 (before Marine Mammal Permits existed) and are known as one of New Zealand's first eco-tourism operators.

Black Cat have a proven history of working in an ethical and responsible manner when it comes to wildlife, conservation and sustainability. This is backed by the awarding of the Qualmark EnviroGold certification, qualifying as a DOC SMART Operator, being part of the Tourism Industry Aotearoa Sustainability Commitment, being finalists in the SKAL International Conservation award in 2019 and winning the Tourism Industry Conservation Award in 2019.

Since our inception, we have worked closely with the Department of Conservation and the New Zealand Whale and Dolphin Trust on ensuring better protection measures are put in place for the Hector's Dolphins around Banks Peninsula. We believe the issuing of any Marine Mammal Permit is a privilege and something that should not be issued without substantial consideration of the impacts on the mammals themselves.

The Hector's Dolphin population continues to decline and is as an endangered species. An abundance of caution needs to be taken by DOC when it comes to issuing new permits.

The Application by Jet Junkies

Black Cat Group have a number of concerns with the application submitted by Jet Junkies.

1. Number of trips applied for

The first point is the sheer volume of trips applied for. Jet Junkies have applied for 5 trips per day with 3 vessels on each trip and no seasonality adjustments. This equates to 5,475 permitted vessel interactions with dolphins in any given year. This application alone has requested more daily trips than the combined permitted watching activity of all permitted operators on Akaroa Harbour in the peak of summer.

There is currently a moratorium in place in Akaroa to prevent additional permits being issued and the current permitted operators are working with DOC to undertake research into the effects of tourism vessels on Hector's Dolphins – this research and findings should be considered when reviewing the application by Jet Junkies for Lyttelton Harbour.

2. Amount of Activity

Due to the high volume of commercial (and recreational) activity in and around Lyttelton Harbour, we feel DOC should take a conservative approach. An additional tourism related permit will simply add to the cumulative impact on dolphins. We believe that there are lessons to be learnt from the experience in Akaroa where there were multiple permits issued over the years, creating a higher level of activity. It's quite appropriate, as can be seen in Kaikoura, to have a single permitted operation – especially with the known threats to Hector's dolphins species combined with the high commercial/recreational levels in Lyttelton Harbour.

3. Educational Value

Section 6 (1) of the Marine Mammals Protection Regulations 1992 states:

(h) that the commercial operation should have sufficient educational value to participants or to the public.

The application from Jet Junkies highlights that each Jet Ski can accommodate 2 passengers with one possibly having 10 passengers. At best, this means that each trip operated by Jet Junkies will reach a maximum of 14 members of the public.

Black Cat do not believe this represents sufficient educational value to outweigh the potential impacts to the dolphins. In addition any donations to dolphin conservation projects will likely be quite small due to the low passenger numbers. Again the benefits are outweighed by the impacts.

4. Inexperience of the “drivers”

Each Marine Mammal Permit is required to list the “Skippers/Drivers” undertaking the permitted activity (in this case viewing of Marine Mammals). Additionally, Section 6 (1) of the Marine Mammals Protection Regulations 1992 also states:

(e) that the proposed operator, and such of the operator's staff who may come into contact with marine mammals, should have sufficient experience with marine mammals:

(f) that the proposed operator, and such of the operator's staff who may come into contact with marine mammals, should have sufficient knowledge of the local area and of sea and weather conditions:

(g) that the proposed operator, and such of the operator's staff who may come into contact with marine mammals, should not have convictions for offences involving the mistreatment of animals:

Black Cat believe that anyone operating a vessel under a Marine Mammal Permit should need to meet the above criteria. As per the application submitted by Jet Junkies, the Jet Ski’s will be operated by customers and therefore DOC cannot have the confidence that the above criteria are being met.

5. Duration of trips

The application by Jet Junkies has stated the trips will last for a maximum of 1hr and cover quite a substantial area. In order to reach the area’s where the dolphins are most likely to be found, the Jet Ski’s will need to travel at considerable speed. The speed of the vessel has a direct link to the risk afforded to the dolphins and we believe the risk to the dolphins once again outweighs the benefits to the dolphins.

Additionally, travelling at such fast speeds reduces the ability to spot dolphins for trained observers – researchers conducting surveying often travel no faster than 5 knots in order to have the best chance of spotting dolphins. The operators of these Jet Ski’s will not only be new to the vessel and the harbour, but will also not be trained to spot dolphins while travelling at such speeds as will be required to complete the trips within the 1hr timeframe.

6. Speed of the Jet Skis

As highlighted in point 5 above, the Jet Ski’s will need to travel at considerable speed in order to cover enough distance in the 1hr timeframe. The Jet Ski’s will be travelling at speeds greater than that of a Hector’s Dolphin which increases the risk as the dolphins will not be able to get out of the way easily.

This risk increases further during the summer months, when the majority of the activity under the permit is likely to take place, as the pods move further into the harbour to give birth. When a calf is young and learning from its mother, they stay a lot closer to the surface of the water and are slower to react to threats such as fast moving vessels.

7. Noise Generated by the Jet Skis

Jet Ski's are extremely noisy vessels. They can be heard by the human ear from quite some distance. A Hector's Dolphin's hearing is a lot more sensitive and given the Hector's Dolphins have a high reliance on echolocation, the noise generated by the Jet Ski's could impact on the dolphins ability to communicate and navigate.

8. Number of vessels within 300m

Section 20 of the Marine Mammals Protection Regulations 1992 states that the maximum number of vessels within 300m of a pod of dolphins is 3 (similar stipulations for whales and seals).

(e) no vessel or aircraft shall approach within 300 metres (1 000 feet) of any pod of dolphins or herd of seals for the purpose of enabling passengers to watch the dolphins or seals, if the number of vessels or aircraft, or both, already positioned to enable passengers to watch that pod or herd is 3 or more:

The application by Jet Junkies is for 3 vessels on each trip, therefore always reaching the maximum number of vessels on any given sighting. The above law would be very hard to manage with the inexperienced drivers of the jet skis if dolphins were sighted within 300m of another vessel and/or other vessels on the harbour approach a pod being viewed by all 3 Jet Junkie vessels. In addition this could limit the current operations of the existing permit holder (Black Cat Group), if there is already the maximum amount of vessels with a pod of dolphins.

Summary

As outlined above, there are a number of concerns raised by this application. Based on this, Black Cat Group seeks that the application by Jet Junkies for a marine mammal watching permit be declined in its entirety.

Should the Department consider it necessary, Black Cat is happy to meet to discuss its submission.

Michael Dine

From: Janette Kear **s 9(2)(a) privacy**
Sent: Sunday, 13 February 2022 10:27 pm
To: Permissions Christchurch
Subject: Jet Junkies application for a marine mammal permit

Dear Christchurch DOC,

Re: Jet Junkies application for a marine mammal permit to offer tours using jet skis.

Jet Junkies propose to run commercial tours in Lyttelton Harbour to view nationally vulnerable Hector's dolphins, and seals.

Hector's dolphin advocate Genevieve Robinson is very concerned about the proposal.

The proposed number of tours per day and the decibel level the dolphins would be subjected to is unknown. Jet skis have the potential to be very disruptive to dolphins as apparently the noise they create is even louder below the water.

Otago University zoology professor Liz Van Slooten is concerned about the potential for collisions with the dolphins, and points out that the Lyttelton Harbour Hector's dolphins are already subject to a lot of human generated activity in their environment - fishing, dredging, and agricultural impacts.

My main concern is the potential for major negative impact on an already vulnerable species.

I am also very concerned about the noise pollution presented by jet skis to residents, and to recreational users of the Harbour. Noise travels across water and is a major and unnecessary stress. There may also be negative effects on other recreational users of the harbour.

Please decline this proposal.

Janette Kear

**s 9(2)(a)
privacy**

Michael Dine

From: Gunther Hammer s 9(2)(a) privacy
Sent: Sunday, 13 February 2022 6:02 pm
To: Permissions Christchurch
Subject: re Jet boat junkie application

To whom it may concern,

I hereby voice my objection against this application.

Jet skis and marine mammals are not compatible at close range in a marine environment.

To pursue mammals, as you would in a commercial operation, is not in the interest of the protection of Hector's dolphins.

To state the obvious, parts of Banks Peninsula are a Marine Reserve and it is our communal responsibility to prevent noise, pollution and encroachment even in areas adjacent to the zoned reserves.

Jet skis operate and are driven by groups of individuals. It will be very difficult to communicate within, monitor or even control such a group to adhere to marine mammal protective legislation.

Looking forward to your reply

Kind Regards

Gunther Hammer

Michael Dine

From: Sue Yates s 9(2)(a) privacy
Sent: Sunday, 13 February 2022 4:42 pm
To: Permissions Christchurch
Subject: Jet Junkies Marine Mammal Permit Application

I was shocked to hear that local jet ski company Jet Junkies has applied for a marine mammal permit, which would allow them to operate jet ski tours around the Lyttelton harbour. As you know, this area is home to many marine mammals, including the vulnerable Hector's dolphin. Noise pollution, habitat disturbance and risk of collisions are of great concern. Please consider our precious wildlife and decline this application.

Thank you for doing the right thing for our precious and fragile marine wildlife and environment.

Sue Yates

Michael Dine

From: imogen maxwell s 9(2)(a) privacy
Sent: Sunday, 13 February 2022 11:20 am
To: Permissions Christchurch
Subject: Jet Junkies Marine Mammal Permit Application

I was shocked to hear that local jet ski company Jet Junkies has applied for a marine mammal permit, which would allow them to operate jet ski tours around the Lyttelton harbour. As you know, this area is home to many marine mammals, including the vulnerable Hector's dolphin. Noise pollution, habitat disturbance and risk of collisions are of great concern. Please consider our precious wildlife and decline this application.

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Michael Dine

From: Julie Jane [REDACTED] s 9(2)(a) privacy
Sent: Sunday, 13 February 2022 11:01 am
To: Permissions Christchurch
Subject: Jet Junkies Marine Mammal Permit Application

I'm deeply concerned that our local marine animals will be disturbed and even harmed if a marine mammal permit is granted to Jet Junkies.
Who will police these jet ski tours to ensure they aren't using excessive speed or getting too close to wildlife? Dolphins, seals and whales can all surface without warning and could be injured by the jet skis. Not to mention the amplified sound under the water, which could disrupt communication and cause stress and fear to wildlife. Please consider the animals first when making your decision.

Julie Jane.

Michael Dine

From: Fiona Cargill s 9(2)(a) privacy
Sent: Sunday, 13 February 2022 10:53 am
To: Permissions Christchurch
Subject: Submission on Jet Junkies Limited permit application

Attention: Michael Dine, Permissions Advisor

Hello Michael

I am very concerned over Jet Junkies' application for a marine mammal permit.

In its application, Jet Junkies note they will respect the wildlife as it is 'their home not ours', yet using noisy fast jet skis to seek out these mammals and go as close as possible for their customers is doing anything but respect the wildlife. This will hound the animals and cause them unnecessary stress and fear. Sound is amplified underwater and the noise alone could drive the animals out of the area in search of a safer and quieter habitat.

Jet Junkies notes that it will slow its speed when coming to known viewing sites, yet dolphins, seals and whales can surface at any point quickly and without warning, so collisions are of extreme concern.

Jet skis are noisy and fast. Who will be making sure they don't use excessive speed and get too close to the wildlife? There are kinder, less threatening and disruptive ways to educate the public, without hounding wildlife in the safety of their habitat.

Please consider the animals first and decline Jet Junkies' marine mammal permit. It is their home, not ours.

Thank you

Kind regards
Fiona

Michael Dine

From: cecile tait s 9(2)(a) privacy
Sent: Sunday, 13 February 2022 8:38 am
To: Permissions Christchurch
Subject: Jet Junkies Marine Mammal Permit Application

I am writing to express my deep, deep concerns over Jet Junkies' application for a marine mammal permit.

Sound is amplified underwater and the noise alone could drive marine mammals out of the area, in search of safer, quieter habitat. It could disturb their communications with each other, and cause stress and fear.

Collisions are also a concern, as marine mammals can surface quickly. Surely, viewing these animals can be done from a quieter, slower vessel than a jet ski?

Who will police these jet ski tours to ensure they aren't using excessive speed or getting too close to wildlife? Dolphins, seals and whales can all surface without warning and could be injured by the jet skis.

I urge you to please decline Jet Junkies' marine mammal permit.

Best regards,
Cécile Tait (Ms)

Michael Dine

From: Gillian Bicknell s 9(2)(a) privacy
Sent: Saturday, 12 February 2022 8:51 pm
To: Permissions Christchurch
Subject: Jet Junkies Marine Mammal Permit Application

Please do not allow this venture to proceed. We should be protecting, not exploiting these mammals. Surely it is a conflict of interest to be being paid a percentage of the earnings.

Yours sincerely
Gillian Bicknell

Michael Dine

From: alihedges11 s 9(2)(a) privacy
Sent: Saturday, 12 February 2022 5:58 pm
To: Permissions Christchurch
Subject: Jet Junkies Marine Mammal Permit Application

I'm deeply concerned that our local marine animals will be disturbed and even harmed if a marine mammal permit is granted to Jet Junkies.

Who will police these jet ski tours to ensure they aren't using excessive speed or getting too close to wildlife?

Dolphins, seals and whales can all surface without warning and could be injured by the jet skis. Not to mention the amplified sound under the water, which could disrupt communication and cause stress and fear to wildlife. Please consider the animals first when making your decision.

Kind regards,
Alison Hedges

Sent from my Galaxy

Michael Dine

From: Amber Lee s 9(2)(a) privacy
Sent: Saturday, 12 February 2022 4:20 pm
To: Permissions Christchurch
Subject: Jet Junkies Marine Mammal Permit Application

Hello,

I am writing to express my concern over jet ski company Jet Junkies' application for a marine mammal permit to operate around the Lyttelton harbour. Who will monitor these jet ski tours to ensure that the local wildlife and their habitat is not disturbed or harmed? Sound is amplified underwater and the noise alone could cause stress to wildlife and disrupt their communication. Collisions are also a concern, as mammals such as dolphins and whales can surface quickly and become injured by jet skis.

Tourism is important for local economies, but these wonderful animals would be better viewed from quieter, slower vessels than jet skis. I urge you to have consideration for the animals in this area and decline Jet Junkies' permit application.

Sincerely,

Amber Lee

Michael Dine

From: Lesley Mochan s 9(2)(a) privacy
Sent: Saturday, 12 February 2022 7:50 am
To: Permissions Christchurch
Subject: Jet Junkies Marine Mammal Permit Application

Hello

I am writing to express my deep concerns over Jet Junkies' application for a marine mammal permit. Sound is amplified underwater and the noise alone could drive marine mammals out of the area, in search of safer, quieter habitat. Collisions are also a concern, as marine mammals can surface quickly. Surely, viewing these animals can be done from a quieter, slower vessel than a jet ski? I urge you to decline Jet Junkies' marine mammal permit.

Thank you
Lesley

Michael Dine

From: C. Miller s 9(2)(a) privacy
Sent: Saturday, 12 February 2022 6:42 am
To: Permissions Christchurch
Subject: Jet Junkies Marine Mammal Permit Application

I am writing to express my deep concerns over Jet Junkies' application for a marine mammal permit. Sound is amplified underwater and the noise alone could drive marine mammals out of the area, in search of safer, quieter habitat. Collisions are also a concern, as marine mammals can surface quickly. Surely, viewing these animals can be done from a quieter, slower vessel than a jet ski? I urge you to decline Jet Junkies' marine mammal permit.

Carol Miller

Michael Dine

From: Roy Hawthorne s 9(2)(a) privacy
Sent: Saturday, 12 February 2022 6:38 am
To: Permissions Christchurch
Subject: Jet Junkies Marine Mammal Permit Application

Please decline the application from Jet Junkies . It will create noise pollution and does not benefit the ocean mammals and sea birds at all.

Roy Hawthorne

s 9(2)(a)

Michael Dine

From: Rebekah Robinson s 9(2)(a) privacy
Sent: Friday, 11 February 2022 10:08 pm
To: Permissions Christchurch
Subject: Jet Junkies Marine Mammal Permit Application

To whom it may concern,

I'm deeply concerned that our local marine animals will be disturbed and even harmed if a marine mammal permit is granted to Jet Junkies.

Who will police these jet ski tours to ensure they aren't using excessive speed or getting too close to wildlife? Dolphins, seals and whales can all surface without warning and could be injured by the jet skis. Not to mention the amplified sound under the water, which could disrupt communication and cause stress and fear to wildlife. Please consider the animals first when making your decision.

Our dolphins are under increasing pressure, please protect them.

Rebekah

Michael Dine

From: Tamara Bozovic s 9(2)(a) privacy
Sent: Friday, 11 February 2022 8:46 pm
To: Permissions Christchurch
Subject: Submission on Jet Junkies Limited permit application

Kia ora,

I am writing regarding the **jet ski company 'Jet Junkies' application for a marine mammal permit** [1]. If granted, this permit will allow them to operate jet ski tours to view dolphins and seals around Lyttelton harbour.

This area is habitat to the vulnerable Hector's dolphin, as well as fur seals and whales. Jet skis would cause noise, represent a risk of collisions, and disturb this fragile marine ecosystem. **For these reasons, I recommend rejecting 'Jet Junkies' application.**

Thank you in advance for your consideration of this submission.

Ngā mihi,

Tamara Bozovic

[1] <https://www.doc.govt.nz/get-involved/have-your-say/all-consultations/2022-consultations/2022-notified-applications/jet-junkies-limited>

Michael Dine

From: Cynthia McConville s 9(2)(a) privacy
Sent: Friday, 11 February 2022 8:49 pm
To: Permissions Christchurch
Subject: Jet Junkies Marine Mammal Permit Application

Hello DOC

I am writing to express my concern for Hector's Dolphin and I ask that DOC refuse permission for jet skis to operate in Lyttleton Harbour.

Jet skis are noisy and inappropriate in the marine mammal environment. They are also a danger to little penguins who float on the surface of the water to rest.

Please do not allow this.

Cynthia McConville

s 9(2)(a) privacy

Michael Dine

From: Marielle Haringa s 9(2)(a) privacy
Sent: Friday, 11 February 2022 7:31 pm
To: Permissions Christchurch
Subject: Jet Junkies Marine Mammal Permit Application

Dear Sir/Madam,

It's simple. Jet skis and dolphins don't match!

I understand that local jet ski company Jet Junkies has applied for a marine mammal permit, which would allow them to operate jet ski tours around the Lyttelton harbour. As you know, this area is home to many marine mammals, including the vulnerable Hector's dolphin. Noise pollution, habitat disturbance and risk of collisions are of great concern. Please consider our precious wildlife and decline this application.

Hopeful for the best outcome for our precious marine life.

With regards
Marielle Haringa

Michael Dine

From: Annie Whiteside s 9(2)(a) privacy
Sent: Friday, 11 February 2022 6:51 pm
To: Permissions Christchurch
Subject: Jet Junkies Marine Mammal Permit Application

Kia ora koutou

I am concerned our local marine animals will be disturbed or harmed if a 'marine mammal' permit is granted to 'Jet Junkies'.

Who will be accountable to police these 'tours' to ensure the safety and well-being of our wildlife? Dolphins, seals and whales can and do surface without warning, and they are at risk of being harmed by humans speeding and getting in their space on jet skis. The amplified noise underwater could disrupt the communication, and cause stress and fear to these sentient beings who rely on us to protect them from human harm.

Please respect these animals and consider the impacts upon them first and foremost when making your decision.

Nga mihi
Annie Whiteside

Sent from my iPhone

Michael Dine

From: Jennifer Riley s 9(2)(a) privacy
Sent: Friday, 11 February 2022 5:12 pm
To: Permissions Christchurch
Subject: Jet Junkies Marine Mammal Permit Application

Tēnā koe

I writing to express my deep concerns over Jet Junkies' application for a marine mammal permit. Sound is amplified underwater and the noise alone could drive marine mammals out of the area, in search of safer, quieter habitat. Collisions are also a concern, as marine mammals can surface quickly. Surely, viewing these animals can be done from a quieter, slower vessel than a jet ski? I urge you to decline Jet Junkies' marine mammal permit.

--

Jennifer Riley

The world needs more plants, less meat

<http://www.EatKind.org.nz>

www.GreenDinnerTable.co.nz

Michael Dine

From: Ruth Van Arendonk s 9(2)(a) privacy
Sent: Friday, 11 February 2022 5:08 pm
To: Permissions Christchurch
Subject: Jet ski marine mammal/wildlife tours , Lyttelton

Kia Ora,

I'd like to voice my opposition to the proposed jet ski wildlife tours in Lyttelton Harbour.

I feel that the likely impact on dolphins far outweighs any potential benefits from increased human-dolphin interaction. As the Hector's dolphin is currently so endangered that the death of one animal is a critical loss to the species, the risk is too high.

The accumulative impact of global warming, the recent dredging, pollution leaching from Bexley Dump into their breeding and calf-rearing areas, and the laying of the sewerage pipe (on top of the usual shipping) means that we don't know enough about the variables to know whether dolphins can cope with another stressor. In fact, it seems unethical and callous to expose them to such a risk. Within the proposed five years, the population could have reached such a tipping point that it would be difficult or impossible for them to recover.

I have lived in Lyttelton for four years, visited the harbour all my life, and only seen dolphins twice as I walked around the bays. It has been a rare privilege and one I hope others will enjoy, but not at the expense of the species or future generations' enjoyment of them.

Nga mihi,

Ruth van Arendonk

Sent from my iPhone