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Submission Form (Form 5)

Submission on Proposed Plan Change 1: Regional Coastal Plan: Kermadec and Subantarctic Islands

[Form 5](#) Submissions on a Publicly Notified Proposed Regional Coastal Plan under Clause 6 of Schedule 1 of the Resource Management Act 1991.

Return your signed submission by 5pm 22 October 2025 via:

Email: planchange1@doc.govt.nz with subject line: Proposed Plan Change 1: Regional Coastal Plan: Kermadec and Subantarctic Islands

Post: Department of Conservation, Private Bag 3072, Hamilton 3240
Attention: Jesse Gooding, RSP Resource Management Team

All sections of this form need to be completed for your submission to be accepted. Your submission will be checked for completeness, and you may be contacted to fill in any missing information.

Full name: David MARIONNEAU _____

Phone: _____

Organisation:

____PONANT_____

*(*the organisation that this submission is made on behalf of)*

Email:

____dmarionneau@ponant.com_____

Postal address:

Address for service: name, email and postal address *(if different from above):*

Trade Competition

Pursuant to Schedule 1 of the Resource Management Act 1991, a person who could gain an advantage in trade competition through the submission may make a submission only if directly affected by an effect of the proposed policy statement or plan that:

- a) adversely affects the environment; and
- b) does not relate to trade competition or the effects of trade competition.



Department of
Conservation
Te Papa Atawhai

**Te Kāwanatanga
o Aotearoa**
New Zealand Government

Please tick the sentence that applies to you:

- ☒ I could not gain an advantage in trade competition through this submission; or
- ☐ I **could** gain an advantage in trade competition through this submission.
If you have ticked this box please select one of the following:
- ☐ I am directly affected by an effect of the subject matter of the submission
- ☐ I **am not** directly affected by an effect of the subject matter of the submission

Hearing Submissions [select appropriate box]:

- ☒ I wish to be heard in support of my submission.
- ☐ I do not wish to be heard in support of my submission.
- ☒ If others make a similar submission, I will consider presenting a joint case with them at a hearing.
- ☐ If others make a similar submission, I will not consider presenting a joint case with them at a hearing.

- *In accordance with clause 7 of Schedule 1 of the RMA, the Council will make a summary of your submission publicly available. The contact details you provide will also be made publicly available, because under clause 8A of Schedule 1 of the RMA any further submission supporting or opposing your submission must be forwarded to you by the submitter (as well as being sent to Council).*
- *Section 352 of the RMA allows you to choose your email to be your address for service. If you select this option, you can also request your postal address be withheld from being publicly available. To choose this option please tick the relevant boxes below.*

- ☐ I would like my address for service to be my email.
- ☒ I have selected email as my address for service, and I would also like my postal address withheld from being publicly available.

Signature:

Date: 22/10/2025

(Signature of person making submission or person authorised to sign on behalf of person making the submission – unless you are providing your submission by email).

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- *it is frivolous or vexatious:*
- *it discloses no reasonable or relevant case:*
- *it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:*
- *it contains offensive language:*
- *it is supported only by material that purports to be independent expert evidence but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.*

(1) The specific provisions of the Proposed Plan Change that my submission relates to are:		(2) My submission is that: <i>(include whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)</i>		(3) I seek the following decisions from the Minister of Conservation. <i>(Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand your concerns.)</i>
Chapter/Appendix/ Schedule/Maps	objective/policy/rule/ standard/overlay	Oppose/support (in part or full)	Reasons	
RULES / Access and anchoring within the coastal marine area of the Subantarctic Islands / Ancillary craft	Rule 40	Support in part	(a) 0.54nm (1000m) from where the mother ship is authorised to access: Could the conditions (a) "and/or" (b) be clarified? (a) is potentially too restrictive for Ancillary crafts/mothership activities. There are some cases where the ancillary crafts might safely operate further than 1000m from where the mother ship is authorised to access but still within 3000 metres from the mothership at any time.	Rule 40 is supported as well as the need for operational safety limits. The safety concern about the distance to be covered by the ancillary crafts from the mother ship to the landing sites is understood. However, the 1000-metre limit could potentially impact current activities. In certain cases, due to the design of the coastline and the bathymetry, ancillary crafts might safely operate further than 1000 m from where the mother ship is authorised to access. We seek clarification of the rule 40.
RULES / Vessels longer than 125 metres	47A	Support in part	Support in Full of 47A to the access to Perseverance Harbour. Would suggest adding Carnley Harbour to this rule	Support in Full of 47A to Perseverance Harbour. We seek the addition of Carnley Harbour under discretionary approval. This would allow for more options in ship operations, such as scenic navigation in Carnley Harbour and potentially ancillary craft scenic outings. Having more operational options in Auckland Island would also help manage the general operator's ship schedule and minimise the clashes between ships.
Glossary	BRB	Support in part	The IMO uses the abbreviation BFRB for Biofouling Record Book, not BRB	Replace the abbreviation BRB with BFRB to be consistent with IMO official wording.

Add further pages as required – please initial any additional pages

