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SUBMISSION for THE PACIFIC INSTITUTE OF RESOURCE MANAGEMENT (PIRM)

DISCUSSION PAPER: MANAGING AND CONTROLLING THE RISK TO THE MARINE ENVIRONMENT FROM BALLAST WATER DISCHARGES

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The Pacific Institute of Resource Management, established in 1984, is an organisation dedicated to sustainable use of the Earth's resources. PIRM is concerned about the deterioration of global ecosystems, the rapid depletion of natural resources and degradation of the environment. It follows that we have great concern for biosecurity issues and have maintained an active interest in this field. We well recognise the crucial importance of biosecurity within the marine context.

Our submission on this Discussion Paper is straightforward. We strongly support the option for New Zealand become party to the International Convention for the Control and Management of Ship's Ballast Water and Sediments. This action would be much the best for biological outcomes which we consider the most important as the crux of Biosecurity. It is also obviously advantageous from the points of view of operational safety and, enforcement and is essential for NZ to maintain its position of leadership in the field of ballast water biosecurity management. We can be proud of our record in this area and it would be fitting if we were to be an early party to the Convention to help advance its enactment. The costs are relatively small and well justified by the prospect of a significant reduction in the biosecurity risks embodied by international shipping movements. There is also likely to be an advantage in reduced spread of agents that have already established in NZ.

Of the proposed method of funding, we support baseline funding by Government with cost recovery for any re-inspections or other compliance issues arising as a result of actions or inactions of ship operators. Although we believe costs should fall on the creators of biosecurity risk, in this case it is at base the demand from a wide variety of consumers of imported goods that drives most shipping movements and this cause of the risk is best assumed collectively by Government. There is a case however for ships that enter NZX waters for purposes other that conveyance of cargo (e.g. chartered fishing vessels, oil rigs and other industrial plant) and where the creation of biosecurity risk is clearly localised, to directly bear the costs of ensuring compliance.

We urge the most rapid progress possible toward joining the International Convention. In the interim it will be of value to introduce measures that will be part of Convention compliance, both for their intrinsic value for biosecurity as well as for promoting readiness for ratification of the Convention.

As our title suggests, PIRM has a particular interest and many contacts within the Pacific Islands. Maintenance of biosecurity is a difficult and critical issue for the small island states. As a developed nation NZ has some duty toward our Pacific neighbours and we wish to encourage providing them with the physical and administrative tools we are developing for Biosecurity. This will not only benefit these Nations themselves but will have added biosecurity benefits for NZ as a close trading partner.

Thank you for the opportunity to make this submission. We are optimistic the good sense of joining this International Convention will prevail.

Yours sincerely,

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For the Pacific Institute of Resource Management Inc. .