

**Chisholm
Associates**

PO Box 125, Manapouri 9643

**Ph (027) 221-4739
e-mail: bill@chisholm.co.nz**

8th November 2022

FURTHER SUBMISSION

The Chief Executive Officer,
Environment Southland,
Price Street, Waikiwi,
Invercargill.

**FURTHER SUBMISSION TO ENVIRONMENT SOUTHLAND ON BEHALF OF
WILLIAM PATRICK CHISHOLM, ON PROPOSED PLAN CHANGE 5**

I WOULD LIKE TO BE HEARD ON THIS SUBMISSION.

The address for service is: Attn: Bill Chisholm, PO Box 125, Manapouri. Ph (027) 2214739; email bill@chisholm.co.nz

This further submission **OPPOSES** the proposed Plan Change 5 in its entirety, as follows:

1. The submission from Heritage Expeditions (Mr Nathan Russ) points out that the Fiordland Marine Guardians (FMG) had influence over who was interviewed for the Kay Booth report (the Report). The Report provides the sole “technical justification” for Plan Change 5. It mentions in passing that FMG had some involvement in this process, as below:

An initial selection of interviewees was made from Environment Southland’s database of permit holders. The selection was augmented (beyond permit holders) and reviewed by a couple of Fiordland Marine Guardians who helped ensure the sample provided a wide range of perspectives.

This statement appears to confirm Mr Russ’s submission. The Report does not name the interviewees, so we have no knowledge of whether they were, indeed, representing a “wide range of perspectives”. What qualifies the “couple of Fiordland Marine Guardians” to assess whether the range of perspectives was wide enough? How do we know that FMG didn’t cherry-pick interviewees, based on who would give answers in line with FMG’s own opinions?



Certified Environmental Practitioner

2. Mr Russ, in his submission, states that this FMG involvement in this process was considerable, giving FMG influence over who was interviewed, and consequently influencing the Report's outcomes and conclusions.
3. My original submission outlined the Report's considerable shortcomings. If it is true that there was **any** involvement by FMG in the Report's interviewee-selection process, this irredeemably taints the Report's findings and recommendations.
4. I note that FMG, in their submission, strongly support Plan Change 5 (with some minor amendments).

Therefore, we have a situation where a committed supporter of Plan Change 5 had influence over who was interviewed for a Report which provides the sole technical justification for Plan Change 5. This situation is completely unacceptable. It will inevitably lead to Court action if Plan Change 5 is not withdrawn. Plan Change 5 now lacks any independent technical justification and hence the process can no longer be advanced.

Yours faithfully



W.P. Chisholm BSc, Msc (Hons)
Certified Environmental Practitioner

