

1 September 2016

Proposed Marlborough Environment Plan
Marlborough District Council
PO Box 443
Blenheim 7240

Via online submissions portal

To whom it may concern,

Proposed Marlborough Environment Plan

I am writing in relation to the Marlborough District Council's call for feedback on the Proposed Marlborough Environment Plan.

The Institution of Professional Engineers New Zealand (IPENZ) is the lead national professional body representing the engineering profession in New Zealand. We have approximately 17,000 Members, including a cross-section from engineering students, to practising engineers, to senior Members in positions of responsibility in business. We are also the Registration Authority for Chartered Professional Engineers and accredit qualifications for professional engineers, engineering technologists and engineering technicians that meet the requirements of the Washington, Sydney and Dublin Accords respectively.

IPENZ notes the reference in section 2.25.2 to having a Chartered Professional Engineer with the appropriate area of competence undertake a structural engineering assessment for heritage resource.

We note sections 3.3.28.8 and 3.3.28.9, which relate to the storage of dairy effluent, require the storage capacity and sealing of the storage system to be certified by a "recognised professional". According to the definitions, a recognised professional "means a suitably qualified and experienced person in their field".

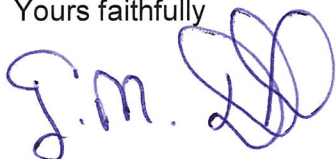
We recommend that where the design of any agricultural structure or facility is complex or potentially has significant safety or environmental risks, the work should be undertaken by a Chartered Professional Engineer. Chartered Professional Engineers are professionals who have successfully completed a competence assessment. They, along with IPENZ Members, are bound by a Code of Ethical Conduct which requires them to, amongst other things, take reasonable steps to safeguard health and safety, have regard to effects on environment, report adverse consequences and act competently.

In addition, under section 39 of the Health and Safety at Work Act 2015, designers of plant, substances or structure that are to be used at a workplace (including a dairy farm) have a number of obligations. These include ensuring, so far as is reasonably practicable, the plant or structure is designed to be without risks to the health and safety of persons. The persons whose health and safety must be considered includes those who work at the workplace, those who construct the structure, those who carry out any reasonably foreseeable activity (such as inspection, cleaning, maintenance, or repair) at the workplace and those who are at or in the vicinity of the workplace and who are exposed to the plant or structure at the workplace.

Protecting the safety of those who work on and around dairy farms is important. As noted in the Government's recently released Reducing Harm in New Zealand Workplaces Action Plan, the agriculture sector has some of the highest number of severe injuries, fatalities and harm at work.

I trust these comments assist you as you look to finalise the Proposed Marlborough Environment Plan. I am available to discuss and assist further, if needed.

Yours faithfully

A handwritten signature in blue ink, appearing to read 'G.M.' followed by a stylized, circular flourish.

Graham Dilks
General Manager - Engineering Leadership