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All written comments received on the MPI salmon relocation proposal, grouped according to surname/business/organisation/lwi name.

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From: Vivienne Alastair [REDACTED]
Sent: Friday, 7 April 2017 12:10 p.m.
To: aquaculture submissions <aquaculture.submissions@mpi.govt.nz>
Subject: Submission - salmon farming

Alastair Boyle

[REDACTED]

Blenheim 7272

Phones : [REDACTED]

Submission on potential re-location of salmon farms in the Marlborough Sounds

My name is Alastair Boyle. I'm a resident of Blenheim. I have a boat in Havelock Marina. I have spent years cruising in the Marlborough Sounds, Pelorus in particular. I have also spent time overseas living aboard my yacht and seen evidence of detrimental aquaculture. I don't consider myself a "greenie", to me this is about making the right decision based on all the facts.

The rationale behind the proposal to re-locate the salmon farms is, to use the words of the proposal, "... our growing understanding of salmon farming sites with higher water flows have reduced environmental effects on the seabed compared with lower flow sites."

The contemporary technique of using floating sea cages for salmon farming originated in Norway in the late 1960's. Surely it is common sense that greater water flow disperses pollutants and is better for the fish. This must have been known when these farms were put in in the Sounds some 30 years ago.

Looking at King Salmon's current website it appears that the salmon are already being farmed in the most ideal conditions.

The proposal states there will be improved environmental and economic outcomes from moving the farms. Maybe so, but there will be increased numbers of salmon in the pens and pollution will be increased overall. The adverse effect of salmon farms on the environment is well documented. They are incubators of disease which must be controlled by antibiotics. This must be weighed against the supposed economic benefits.

It is said that jobs will be created and there will be economic benefits. This is questionable and should be examined by the panel. The focus of this whole process is on re-location and is very narrow. It seems to be a given that re-locating the farms means the company will comply with the benthic guidelines; there will be economic benefits, these will flow to the community; Government aquaculture targets will be met; and all will be well.

But what if water flow is not the general panacea? There is already up to a four metre tidal flow in the Sounds so there is a reasonable flow at current sites. What if the real problem is water temperature? Let's not forget global warming in this. The new sites have marginally lower water temperatures, but far from ideal for salmon farming.

Alaskan Fish & Game say less than 15c is the ideal. Moving the pens may see some improvement but won't necessarily make the operation commercially viable. What if this is just a case of Government wishing to fulfil quotas, and a foreign-controlled company, that is not profitable, looking to pump up its share price before selling out?

The McGuinness Institute is a reputable, non partisan think-tank which undertakes research and analysis with a view to contributing to a national conversation on New Zealand's long term future. The Institute published a report in 2016 entitled, "New Zealand King Salmon: A Financial Perspective". Its conclusions are relevant to this current proposal. This report is a public document on their website www.mcguinnessinstitute.org.

Firstly it questions King Salmon's financial viability, to quote the report: "The Institute considers that NZKS is not well-positioned to deal with financial shocks and a prudent investor should be cautious before making any major investment decisions. The company is less beneficial to the local community and the country (especially in terms of jobs and export dollars) than is being communicated to both the New Zealand government and the general public. The New Zealand government may therefore be supporting a business venture that is unlikely to deliver long term net benefits to New Zealand. Furthermore NZKS's operations may ultimately damage an important ecosystem that could alternatively be used to build sustainable and durable businesses for the Marlborough community, and contribute positively to the wider New Zealand community."

Further McGuinness suggests that they undertake a review of the causes, and impact, of salmon mortalities. The report cites \$6 million of salmon mortalities per year in 2014 and 2015. That's a lot of dead salmon to dispose of in a year and affects profitability. The Institute says, "There is little information on the extent to which the mortalities are likely to increase and how they could be managed or reduced. It has been suggested that recent salmon mortalities are due to an increase in water temperatures."

It is my submission the McGuinness Institute report, which is recent and from a truly independent body is highly relevant and must be considered by the panel.

The issue of the company's financial viability, the huge salmon mortality and the reason for it, and for that matter the McGuinness Institute report are not referred to in any of the documentation relating to this proposal. I wonder why? It is my submission that the panel must require further evidence of King Salmon's financial position and about the cause of salmon mortalities before allowing any re-location.

If the panel can't be reasonably certain that moving the pens will fix the problem then at the very most it should only allow one pen to move as a test case to see if water flow is the solution.

Let's not see a situation where re-location is approved, the share price goes up, foreign interests sell out, the company is not financially viable and we end up with a commercial and environmental mess in the Sounds.

I wish to be heard on my submission at the hearings.

Thank you.

Alastair Boyle

Written Comment No: 0388

Subject	MPI Salmon Farm Relocation Submission
From	James Bradley
To	aquaculture submissions
Sent	Friday, 24 March 2017 2:07 PM
Attachments	<<MPI Submission for Salmon Farm Relocation by James Bradley.docx>>

Good Afternoon,

Attached is my personal submission for the MPI Salmon Farm Relocation for farms operated by New Zealand King Salmon.

I look forward to seeing the outcome

Regards,

James Bradley, Territory Manager



NZ



NZ

W: www.kingsalmon.co.nz | **NZ Sales:** 6 Mitchelson Street, Ellerslie, Auckland 1051 | **Mail:** PO Box 12957, Penrose, 1061 | **Head Office:** 93 Beatty Street, Tahunanui, 7011



ORA KINGTM

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Written Comment No: 0388

Date: 10.3.17

Salmon Farm Relocation
Ministry for Primary Industries
Private Bag 14
Port Nelson

aquaculture.submissions@mpi.govt.nz

To whom it may concern / Dear Advisory Panel

I'm James Bradley an Account Manager for New Zealand King Salmon. I manage the relationships of supermarket customers for all of Auckland and Northland. I support the farm relocation for a variety of reasons which have already been highlighted by MPI and other members of our team. I personally have strong relationships with approximately 200 people who rely on New Zealand King Salmon (among products from other suppliers), day to day to keep them in employment. They are a passionate bunch of owner operators, chilled foods buyers and fish mongers (seafood managers), with some dealing with our products since before I was even born! I run into shoppers daily and the way they describe New Zealand King Salmon products never ceases to amaze. They love our products and each have there own particular way of cooking, serving and eating them which they share with me with conviction in a sense that our products make there lives more interesting and supports there healthy lifestyles.

When talking to my customers and shoppers about New Zealand King Salmon, they speak with passion and pride that they've seen and helped a small innovative kiwi company grow and thrive in the local market place. They love products produced in New Zealand and since the introduction of low grade imported salmon to New Zealand, largely driven by demand exceeding supply, they've been uneasy wondering how a country which is a salmon producer can't keep up with the demand of our citizens. Aquaculture is an industry in significant growth due to high amount of pressure put on species which are caught or gathered commercially, global trends and demand for sustainable products that are 'better for you. New Zealand is in a perfect position to capitalise and become market leaders in the industry, with the relocation vital to be in line with the best practise for the industry making this move a move of common sense.

I'm personally a big supporter of clean green New Zealand and how our environment plays a crucial part in brand New Zealand which drives our two biggest industries, i.e. Dairy and Tourism. The fact that the relocation results in lessening the effect on the seabed of the beautiful Marlborough Sounds while also allowing kiwi families to continue to enjoy New Zealand produced salmon, helps drives growth of export markets who love what we produce and also progressively become part of 'Brand Marlborough' even as a tourist attraction shows that this relocation is in line with our country, environment and company strategy.

I've been employed by New Zealand King Salmon since October 2015, and have recently finished a three month secondment which gave me exposure to the head office interaction between New Zealand King Salmon, and Progressive Enterprises and Foodstuffs. This gave me a valuable insight into the industry as a whole and gave me personal understanding of the challenges our customers have. One or two of these directly derived from the lack of supply/quality issues which arise due to our farms being at current low flow sites. This proves that as an account manager, our company can meet our customers' needs as new farms are given consent and current farm locations are moved to scientifically proven better areas for salmon farming.

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Thus proving how crucial this decision by MPI and all parties involved is for the future of New Zealand, New Zealand King Salmon, the Aquaculture Industry, our customers, employees, and kiwi families alike. If the project doesn't go ahead, these parties will suffer as a consequence

Signed

Name / Position: James W. Bradley, Territory Manager Auckland North

Contact email address: [REDACTED]

From: Isaac Brennan [REDACTED]
Sent: Thursday, 6 April 2017 5:05 p.m.
To: aquaculture submissions <aquaculture.submissions@mpi.govt.nz>
Subject: Re: Written comments on potential relocation of salmon farms in Marlborough Sounds

Hello, I have attached a word file to my emails am I am unsure why you can not open?

but regardless, I will copy paste my written submission into this email so you have full access to it. Thank you

Regards,
Isaac Brennan

Isaac Brennan's Submission on the Potential relocation of salmon farms in the Marlborough Sounds.

Introduction

My Name is Isaac Brennan, I have been a resident of the Marlborough sounds community for the past 20 years. My mother and father raised my 2 older brothers and myself in the outer parlous area, more specifically in Waitata Bay. My unique upbringing is partly responsible for developing my strong conversational morals, ethics and values. I feel obliged to write this submission to protect the outstanding natural character of the Marlborough Sounds, Furthermore ensuring future generations are presented with the same unique opportunities I have experienced. If given the chance, I would like to publicly voice my concerns in front of the board. This Submission is presented on behalf of those in the community who share a common desire to protect and safeguard the commons. The purpose of this submission is to express concerns regarding the over production of the aquaculture industry in the Marlborough Sounds. Hence, I am appealing for option three to be implemented "*Not make regulations under section 360A and all existing lower-flow farms remain at their present location*". I am writing my submission in regards to the following document.

- Potential relocation of salmon farms in the Marlborough Sounds Proposal to amend the Marlborough Sounds Resource Management Plan to enable the relocation of up to six existing salmon farms by regulations made under section 360A of the Resource Management Act 1991 - MPI Discussion Paper No: 2017/04. Prepared for consultation by the Ministry for Primary Industry

Incorrect monitoring of environmental impact

In October 2011, King Salmon first applied for changes to the Marlborough Sounds Resources Management Plan. In summary the application requested salmon farming be changed from prohibited to a discretionary activity in eight different locations. In addition, the plan change requested a 3rd zone be developed (adding to the two current coastal marine zones) to accommodate for the eight new farm locations. The sum of feed levels applied for by King Salmon during this application was not to be in excess of 40,000 tones. The application was appealed by 2 different organisations, namely Sustain our Sounds (SOS) and the Environmental Defence Society (EDS). EDS appealed on the grounds that the Port Gore farm was located in areas of outstanding natural character and landscape. SOS argued that Environmental Protection is a core element of sustainable management. The latter explored the Legal Dualism of Environmental Bottom Lines versus Overall Broad Judgement

The appellants then correctly summarised such and application would not give effect to policy's 13 and 15 of the New Zealand Coastal Policy Statement 2010 (NZCP), concluding that King Salmons application should not be approved as it was a direct breach of such a document. The Supreme Court combined the arguments of EDS and SOS to:

- A accept the possibility of environmental bottom lines;
- Development not at the expense of bio-physical outcomes
 - Achieve both limbs: generational and environmental protection “while” achieving Development
 - Outcomes not compartmentalised
- B reject the overall judgement approach
- C clarify the RMA’s safeguards on water quality; and
- D clarify the relationship between adaptive management and the precautionary approach

Currently the Minister for primary industries released a document with intentions to relocate six salmon farms, some of which are currently situated in locations prohibited to salmon farming, summarised, the relocation of the farms would mean a transition from areas of slow flow to fast flow. Furthermore, an additional 24,600 tonnes of feed was applied for. The Minister of MPI’s states that salmon farms that are located in fast flow areas can dissipate vast amounts of feed in comparison to slow flow areas, consequently, comparatively reducing the environmental damage perceived on the benthic footprint of each salmon farm. However, the Minister has failed to recognise that the pollution caused by each farm’s waste is also concentrated in the water column. A site by site analysis concerning the health of each farm’s benthic footprint does not display the combined pollution levels. Instead, the minister must take into consideration the Best Practise guidelines which provides framework for consent conditions dictating their compliancy. Best Practise guidelines would advise to consider the effects of the amalgamation of the added pollution levels in the immediate area as well as the surrounding areas. Hence evaluating the consequences added feed and therefore pollution levels would have on areas that would transform to become a deposit zone in the event of relocation, for example the Waitata Reach.

It is in the best interest of the commons that a bottom line approach be impended to avoid the over pollution of Marlborough sounds water ways. To implement such a method the entire Marlborough sounds pollution levels must be accounted for. Then, a sustainable maximum level of pollution must be finalised without any exceptions to exceed such an amount. On the contrary, this was exactly what the Board of Inquiry did after the 2011 King Salmon vs EDS and SOS case, then only allowed the farms to expand their production which was later justified through a “adaptive management” process. This is simply not good enough, the idea of a bottom line is not something that can be flexed to corporate will, a bottom line is implemented to insure development will not come at the expense of bio-physical outcomes.

There needs to be more emphasis on preserving the natural amenities of our environment and less on developing overseas enterprises at the expense of the environment.

Unfair submission process

I do not accept that such a level of additional feed does not concerns itself with a matter of national importance Fairness in the process is missing. In the previous 2011 submission community participation was encourage through a number of different mechanisms such as;

- funding from the ELA
- Cross examination of experts was allowed

In the current 2017 submission all previous process to support community buy-in ceases to exist, no funding was provided by the ELA and cross examinations of the experts will not be allowed. The Environmental court proclaims one of the principles of consultation is underpinned by fairness. I struggle to observe where such “*fairness*” exists in the current application process. The MPI have failed to provide consultation mechanisms that enable the community to engage their opinion in a meaningful manner. In order for the community to express their concerns adequately technical reports and information need be provided to enable the most accurate analysis of the situation. Failing to provide such mechanisms will evidently result in the ability of the community to fully express themselves in the final decision making process. Because the MPI have implemented processes that have suppressed an analysis of true sustainable management as per Resource Management Act (RMA), I suggest King Salmons submission to relocate the six farms be made invalid and hence dismissed.

Contrasting with the Resource Management Act 1991.

The Resource Management act 1991 (RMA) is New Zealand’s definitive legislation intended to facilitate sustainable interaction between the sociosphere, econosphere and biosphere. All activities must give effect to the hierarchical system of documents that is the RMA in order to maintain sustainable management. Sustainable management is defined in section 2 part 5 of the RMA as” *managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety*” (RMA 1991). The minister’s proposal provides only for industry growth through a capitalist perspective by using the marine farming space more efficiently while in reality expanding five-fold. It is the minister’s opinion that relocating the salmon farms will achieve better outcomes within the

same amount of space. I acknowledge that the relocation with added feed amounts will provide a platform for increased productivity, and potentially more jobs, however it neglects the responsibility to maintain both cultural and social well-beings. Increased productivity of fin fish undoubtedly results in more waste and hence more pollution. With the levels of pollution increasing it jeopardise the biodiversity in the Sounds. Loss of biodiversity will result in negative repercussions for local Iwi by preventing Maori from their right to administrate kaitiakit over the lands and seas. In addition, the broader public including the tourist sector will also be at loss with a reduction in the variety of sea life.

Conclusion

It needs to be reminded that the Marlborough Sounds is an area of outstanding natural beauty, the preservation of the landscape, seascape and wildlife should not be jeopardised by industrial development. King Salmons perspective of the Marlborough sounds being nothing more than six under performing low flow farms does not constitute for the loss in biodiversity and destruction of the area. I plead on behalf of my generation and future generations to come. Please do not allow such development to take place. This case my act as a precedence for any further development jeopardising areas of outstanding natural character and beauty and prevent it from occurring.

Written Comments No: 0282

Subject	The Potential Relocation of Salmon Farms in the Marlborough Sounds
From	Howard Bretherton
To	aquaculture submissions
Sent	Tuesday, 21 March 2017 6:32 p.m.
Attachments	<<Potential-Relocation-of-Salmon-Farms-in-the-Marlborough-Sounds-Feedback-form.pdf>>

The Potential Relocation of Salmon Farms in the Marlborough Sounds
Mr. Howard Bretherton

[REDACTED]
[REDACTED] Whangarei 0173

Mbl: [REDACTED]

Email: [REDACTED]

The Potential Relocation of Salmon Farms in the Marlborough Sounds: Feedback form

Written comments must be lodged by 5pm on Monday, 27 March 2017.

Comments can be:

- emailed to aquaculture.submissions@mpi.govt.nz
- posted to
Salmon Farm Relocation
Ministry for Primary Industries
Private Bag 14
Port Nelson 7042

Consultation questions

These questions are designed to stimulate your thinking and help us report back clearly on people's written comments. There are also spaces after each question on the feedback form for additional comments. These questions are the same as those in the consultation document.

Please make sure it is clear which aspect of the proposal (including question number if appropriate) you are commenting on.

MPI will consider all relevant material made in your written comments, so you are welcome to provide information supporting your feedback. Please make sure you include the following information in your written comments:

- the title of the consultation document
- your name and title
- your organisation's name (if you are submitting on behalf of an organisation), and whether your written comments represents the whole organisation or a section of it
- your contact details (such as, phone number, address, and email).

Written comments are official information

Please note that your written comments are official information. Written comments may be subject of requests for information under the Official Information Act 1982. The Official Information Act specifies that information is to be made available to requestors unless there are sufficient grounds for withholding it, as set out in the Official Information Act.

Persons who make written comments may wish to indicate grounds for withholding specific information contained within their feedback, such as if the information is commercially sensitive or if they wish, personal information to be withheld. The Ministry for Primary Industries will take such indications into account when determining whether or not to release the information.

Written Comments No: 0282

Public hearings

A Marlborough Salmon Farm Relocation Advisory Panel will hold hearings in April. These hearings will allow people to speak to their written comments.

If you would like to attend a hearing and meet with the panel, please let us know as part of your written comments, including which location you would prefer.

Once we receive your written comments and your request to meet with the panel, we will notify you of the date, time and location.

<input type="checkbox"/>	I would like to speak to my written comments at a public hearing
<input type="checkbox"/>	I do not want to speak to my written comments at a public hearing

Written Comments No: 0282

Questions

Question 1:

Do you think that up to six salmon farms within Marlborough Sounds should be allowed to relocate to higher-flow sites?

Yes

Question 2:

Which of the potential relocation sites do you think are suitable for salmon farming?

All of them

Question 3:

Which of the existing lower-flow sites should be relocated?

Question 4:

If you have concerns about particular sites, what are they and what could be done to address these concerns?

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Question 5:

Do you feel that there are potential benefits or costs of relocating farms that have not been identified?

Question 6:

Are there rules, policies or conditions that you believe should be added? Please provide information to support any proposed new provisions?

Question 7:

Provided that detailed standards and requirements are met, do you agree that salmon farming on the potential relocation sites should be a restricted discretionary activity?

Yes

Question 8:

Do you agree that the overall surface structure area of salmon farms should not be increased?

No

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Question 9:

If the sites at the existing lower-flow farms (other than Crail Bay MFL032) are vacated, do you believe that marine farming should be prohibited in these sites or do you think that these sites should remain open to other types of aquaculture for aquaculture settlement purposes?

No. I believe they should be left to regenerate

Question 10:

Given the multiple ownership at Crail Bay MFL32, if this site is relocated, should aquaculture be fully prohibited or should shellfish farming be allowed to continue?

Question 11:

Do you agree with a staged adaptive management approach if salmon farming at the potential relocation sites proceeds?

Question 12:

Is there any wording you agree or do not agree with in the proposed regulations?

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Question 13:

Are there any particular issues at the existing lower-flow sites that you would like to comment on?

The main issue is the depth of the water resulting in temperature fluctuation due to climatic change.

Question 14:

Which of the existing lower-flow salmon farms in the Marlborough Sounds do you think are a higher priority to relocate and why?

The shallower and the less free flowing currents the higher the priority

Question 15:

Is there anything specific that you would like the Minister for Primary Industries to be aware of for any of these sites when thinking about the potential relocation proposal?

Question 16:

Are there particular landscape or natural character values that you want to identify to the Minister for Primary Industries for any of the potential relocation sites?

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Question 17:

Are there other effects on landscape and natural character not outlined in the Hudson Associates or Drakeford Williams reports that you would like the Minister for Primary Industries to be aware of?

Question 18:

Are there any further measures that you believe could be taken to reduce effects at on landscape and natural character at the potential relocation sites?

Question 19:

What are your thoughts on the potential water quality effects at the potential relocation sites?

I believe that the freer flowing and colder water would have a positive impact ecologically and for general fish health

Question 20:

Are there ways in which the potential relocation sites should be developed to help avoid, remedy or mitigate adverse effects on water quality?

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Question 21:

Are there other effects on water quality that you would like us to be aware of?

Question 22:

What further information would you suggest the Minister for Primary Industries collects on water quality effects in relation to the Tio Point site?

Question 23:

What are your thoughts on the seabed effects at the potential sites?

Question 24:

Are there ways to develop the potential sites to help avoid, remedy or mitigate adverse effects on the seabed at each site?

Written Comments No: 0282

Question 25:

Are there other seabed values or effects that you would like the Minister for Primary Industries to be aware of?

Question 26:

Are there effects on pelagic fish that you would like the Minister for Primary Industries to aware of?

Question 27:

Are there effects on seabirds that you would like the Minister for Primary Industries to be aware of?

Question 28:

Do any of the sites pose a greater risk to seabirds than other sites?

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Question 29:

Are there marine mammals in the Marlborough Sounds that you think may be particularly impacted by this proposal?

Question 30:

Do any of the potential sites pose a greater risk to marine mammals than other sites?

Question 31:

Do you agree that there should be an independently audited Biosecurity Management Plan for salmon farming?

Question 32:

What are your thoughts on the potential improvement in salmon health from the proposal? What about salmon welfare and husbandry?

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Question 33:

Are there particular navigational effects at any of the potential relocation sites that the Minister for Primary Industries should be aware of?

Question 34:

What is your view on the Waitata Mid-Channel site from a navigational perspective, and the possibility of cruise ships or large superyachts using the area?

Question 35:

Are there particular tourism and recreation values that you would like the Minister for Primary Industries to be aware of at any of the potential sites?

Question 36:

What measures could be taken to remedy or mitigate effects on tourism and recreation values if salmon farms were relocated to these sites?

Written Comments No: 0282

Question 37:

Are there other heritage values that the Minister for Primary Industries should be aware of?

Question 38:

Are there any other measures that should be taken to avoid, remedy or mitigate noise effects at any of the potential sites?

Question 39:

Are there any other matters in relation to underwater lighting that you think the Minister for Primary Industries should be aware of?

Question 40:

Social and community effects of the potential relocation proposal are wider than just residential amenity. What effects do you think there will be as a result of the potential relocation proposal?

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Please use the space below to provide any additional comments you may have

Aquaculture in particular salmon farming is a highly specialised and monitored primary resource. It is very beneficial for the community in terms of jobs and for the overall economy

There is a high demand, high value industry with a low environmental impact.

The potential for NZ to gain international clean reputation for a high value highly sort after product for best practices will ensure, not only the local economy will thrive, jobs will be created and will create little environmental impact.

This is a socially responsible farming practice and should be encouraged.

Written Comments No: 0282

[illegible]

Written Comment No: 0506

Subject	Salmon Farm Relocation Submission
From	Richard Briggs Photography
To	aquaculture submissions
Sent	Monday, 27 March 2017 12:28 a.m.
Attachments	<<Submission Salmon Farms Relocation 2017.pdf>>

Hi,

Please find attached my submission.

Regards

Richard Briggs



Written Comment No: 0506

Richard Briggs

Picton 7220

To: Salmon Farm Relocation
Ministry for Primary Industries
Private Bag 14
Port Nelson

aquaculture.submissions@mpi.govt.nz

To: The Salmon Relocation Advisory Panel

My name is Richard Briggs, I'm a freelance commercial photographer and resident of Picton, Queen Charlotte Sound, Marlborough Sounds.

I support the potential salmon relocation process being proposed by MPI, because I believe the salmon farm relocation, will provide for better environmental, social and economic outcomes.

I understand that by relocating farms from lower water flow sites to higher water flow sites will mean fish performance will improve and therefore the health of the salmon will be better. I also feel it will have a lower level of impact on the seabed, which will have positive environmental benefits.

Environmentally, adopting the Best Management Practice guidelines, is the future for aquaculture globally.

I also believe that jobs will be created if this proposal goes ahead, resulting in economic improvements for the communities in the top of the south.

I would not like to be heard by the hearings panel.

Yours sincerely

Richard Briggs

Name: Richard Briggs

Email: [REDACTED]

Date: 26 March 2017

Phone: [REDACTED]

Subject	Farm Relocation Submission
From	Mick Brown
To	aquaculture submissions
Sent	Thursday, 23 March 2017 10:52 AM

To: The Salmon Relocation Advisory Panel

Mick Brown/ Procurement Manager, NZKS Nelson

I support the potential salmon relocation process being proposed by MPI because I believe the salmon farm relocation will provide for better environmental, social and economic outcomes. I understand that by relocating farms from lower water flow sites to higher water flows sites fish performance will improve and therefore the health of the salmon. It will also have a lower level of effect on the seabed which will have positive environmental benefits. Environmentally adopting the Best Management Practice guidelines that were agreed by the Council and community is the future of aquaculture globally. There will be more direct and indirect jobs created if this proposal goes ahead resulting in economic improvements for the communities in the top of the south. As NZKS has a range of suppliers across NZ the flow on effect for them will be very beneficial. Moving some farms away from baches to more remote locations will improve social amenities which is also a good thing.

I **would not** like the opportunity to be heard by the Advisory Panel.

Kind Regards

Mick Brown, Procurement Manager.



 | W: www.kingsalmon.co.nz | A: 25 Bullen Street Tahunanui, 7011



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Subject	Submission
From	[REDACTED]
To	aquaculture submissions
Sent	Monday, 27 March 2017 2:58 p.m.
Attachments	<<170306-SubmissionForm Brown (page 1).pdf>> <<170306-SubmissionForm Brown (page 2).pdf>>

Please find attached my submission on proposed use of Section 360A of the RMA to allow massive expansion of salmon farming in the Marlborough Sounds.

Thanks for your consideration.

Regards
Shirley Brown

Submission on proposed use of Section 360A of the RMA to allow massive expansion of salmon farming in the Marlborough Sounds

Name of Submitter in full Shirley Brown

Address

Blenheim 7273

Email

Telephone (day)

Mobile

<input checked="" type="checkbox"/>	I am against the whole Ministry for Primary Industries (MPI) proposal for "Potential Relocation of Salmon Farms in the Marlborough Sounds"
<input type="checkbox"/>	I would like to speak to my written submission at a public hearing in
<input checked="" type="checkbox"/>	I do not want to speak to my written submission at a public hearing

To the Marlborough Salmon Farm Relocation Advisory Panel and Minister Nathan Guy:

I am writing to express my dismay about Minister Nathan Guy's proposal to overrule the Marlborough District Council's (MDC) plan and allow for up to six new salmon farms in areas prohibited for aquaculture in the Marlborough Sounds.

The MDC's State of the Environment Report 2015 noted that:

- The Marlborough Sounds biodiversity is NOT in good shape.
- The issues include: fewer fish, not as many species, serious loss of biogenic habitats, sedimentation in estuaries and biosecurity incursions.

The Marlborough Sounds needs proposals for protection and restoration of its natural environment and marine ecosystem, **NOT** proposals for further exploitation and degradation such as this one.

It is submitted that the aim of this MPI proposal, thinly disguised as salmon-farming relocation, is in fact a proposal for the massive expansion of salmon farming in the Waitata Reach area of the Pelorus Sound.

If successful it will mean a cluster of 7 farms in Waitata Reach. It will mean 2 to 3 times more waste discharge spread over a wider benthic footprint. It will mean greater adverse cumulative impacts on the water column.

The Marlborough Sounds needs, we submit, more extensive Marine Reserves, **NOT** more Salmon Farms on an industrial scale as is now proposed by MPI and New Zealand King Salmon (NZKS).

The Board of Inquiry drew the limits

In 2012 NZKS applied for nine new salmon farms in areas prohibited for salmon farming via a Board of Inquiry process. They were ultimately allowed three farms. The Board of Inquiry, and then the Supreme Court, made a number of very important findings, which, it is submitted; this proposal is attempting to ride rough shod over.

It is submitted that this is a blatant attempt to try and achieve for NZKS what it failed to get last time around. This time it is being done under the cloak of a relocation scheme. It is submitted that this is a relocation is factually wrong. Two of the salmon farms to be "relocated" do not in fact exist – there has been no salmon farming on the sites for at least five years.

Once again, MPI and NZKS are trying to put new salmon farm sites into outstanding natural landscapes and, it is submitted, ignoring the legal requirements of the New Zealand Coastal Policy Statement and the adverse cumulative impacts on the this iconic landscape.

This proposal, we submit, ignores the Board of Inquiry finding a threshold limit of two new farms in the Waitata Reach and that the Environment Court subsequently echoed this.

The best Place for Salmon Farming?

The existing NZKS operations are suffering from regular (4 in the last 5 years) unusual mortality events. There is a Controlled Area Notice under the Biosecurity Act in place as a result. Pathogens new to NZ have been discovered in the dead salmon.

We submit that the science shows that 17 degrees Celsius is the maximum sustainable temperature for salmon farming, above this trigger the fish become stressed and vulnerable to disease. MDC records show that the Waitata Reach of the Pelorus Sound has summer seawater temperatures exceeding 17 degrees for long periods. These adverse environmental factors combined with poor management practices is, we submit, demonstrated by these regular significant salmon mortality events.

Instead of allocating clean unspoiled water space for new farms and closing old farms, real pressure should be put on NZKS to operate these existing farms in accordance with Best Management Practice Guidelines. It can be done we submit.

Rather, MPI and NZKS seem to be arguing that the prospect of more jobs and profit justifies ignoring adverse cumulative environmental effects in this iconic public space. This so called MPI report is, we submit, paid for by NZKS using an expert who has a history of working for that company. A truly independent review of this report will, like last time, we submit, show these claims are greatly inflated.

This approach quite wrongly, we submit, gives no credence to the adverse impacts on; endangered species such as the King Shag, recreational users, navigation issues, tourism, and struggling nearby scallop beds.

Other Comments:

We need to protect and preserve the Marlborough Sounds, so that people, fish and marine life have a safe environment for the future.

Conclusion: This proposal is fundamentally flawed, environmentally unsustainable and should not proceed!

Written Comment No:0582

Subject	Fwd: Baz H and Sarah B Submission
From	Sue Stevens
To	aquaculture submissions
Sent	Monday, 27 March 2017 2:38 p.m.
Attachments	<<Sbizhub pic17032713370.pdf>> <<Sbizhub pic17032713380.pdf>>

Written Comment No:0582

Salmon Farm Relocation

Ministry for Primary Industries

Private Bag 14

Port Nelson

aquaculture.submissions@mpi.govt.nz

To: The Salmon Relocation Advisory Panel

Sarah Brown
Aqua Production Administrator
Picton

I support the potential salmon relocation process being proposed by MPI because I believe the salmon farm relocation will provide for better environmental, social and economic outcomes.

I understand that by relocating farms from lower water flow sites to higher water flows sites fish performance will improve and therefore the health of the salmon. It will also have a lower level of effect on the seabed which will have positive environmental benefits.

Environmentally adopting the Best Management Practice guidelines that were agreed by the Council and community is the future of aquaculture globally.

There will be more direct and indirect jobs created if this proposal goes ahead resulting in economic improvements for the communities in the top of the south.

Moving some farms away from baches to more remote locations will improve social amenities which is also a good thing.

I ~~would~~ would not like the opportunity to be heard by the Advisory Panel.

SJ Brown

27/3/17

Written Comment No: 0513

Subject	Submission on Salmon Farms Relocation in Marlborough Sounds - Steffan Browning
From	Steffan Browning
To	Steffan Browning; aquaculture submissions
Sent	Sunday, 26 March 2017 11:13 p.m.

Potential Relocation of Salmon Farms in the Marlborough Sounds

COMMENTS FORM

Comments closes 5pm, 27 March, 2017

Your details

NAME: Steffan Browning

ORGANISATION (if applicable):

CONTACT PERSON: Steffan Browning

POSTAL ADDRESS: [REDACTED] Blenheim, 7240

EMAIL: Steffan Browning

DAYTIME PHONE: [REDACTED]

MOBILE: [REDACTED]

YES I would like to speak to my written comments at a public hearing

Comments sent to: aquaculture.submissions@mpi.govt.nz

DATE: 26 March 2017

I OPPOSE the relocation proposal for the following reasons:

Issue	Comment
1. Process	<ul style="list-style-type: none">• The use of Section 360A of the RMA gives the Minister of Aquaculture the power to over-ride the Marlborough Sounds Resource Management Plan.• It takes decision-making and resource management away from the Marlborough District Council and local community.• It disregards the 2013 Board of Inquiry [BOI] and 2014 Supreme Court decisions about expansion of salmon farming into prohibited areas of the Marlborough Sounds.• The proposal provides commercial benefit for one company, using public water space for free, above the interests of other users of the Marlborough Sounds, including iwi.• It sets a precedent for the Minister to make similar water-grabs around New

Written Comment No: 0513

Zealand, usurping the power of local authorities and wishes of local communities.

2. Precautionary approach

- Policy 3 of the NZ Coastal Policy Statement calls for a precautionary approach. This was reinforced by the BOI decision [par 179].
- The three new high flow sites granted by the BOI are only just coming on stream. It would be precautionary to wait until monitoring shows the company can operate these sites, along with their other high-flow sites, to comply with the Benthic Guidelines at maximum feed levels for at least three years before any more space is considered. [consistent with BOI Condition of Consent 44a]
- This especially applies to Tio Point, which would be the fourth salmon farm in close proximity in Tory Channel.
- In the meantime reduce the feed and stocking rates at the low flow sites to meet the Benthic Guidelines.

3. Nitrogen pollution

- We dispute the accuracy of Minister's statement: "This proposal is about making better use of existing aquaculture space. There is no proposed increase in the total surface structure area used for salmon farming in the Marlborough Sounds," – Nathan Guy, Minister of Aquaculture.
- The proposed relocation sites are not "existing aquaculture space". They are **prohibited** to aquaculture.
- While farm surface area may remain about the same, there is a proposed five-fold increase in fish feed to 24,600T a year.
- With more feed and more fish, the amount of nitrogen pollution discharged into the Sounds through salmon faeces would also increase. The high-flow farms would be discharging the equivalent of the nitrogen in sewage from a city the size of Christchurch, straight into the sea.
- Residents must meet strict obligations to keep waste out of the enclosed waters of the Sounds. Yet this proposal would allow the untreated discharge of polluting nutrients from six new salmon farms.
- As a land-based comparison of low flow and high flow sites, it is not OK for a dairy farmer who has been pulled up for discharging effluent into a small stream to resolve the issue by increasing his herd and discharging to a faster river.

4. Offshore Alternatives

- The NZKS Supreme Court decision ruled there was an obligation to consider alternatives under the NZ Coastal Policy Statement and Section 32 of the RMA. **"Particularly where the applicant for a plan change is seeking exclusive use of a public resource for private gain."** [SC 172-173]
- Having salmon farms offshore (open ocean aquaculture) rather than in the confines of the Marlborough Sounds would dilute the pollution and remove the conflict with other users. This approach is being used in countries such as Norway.
- Offshore alternatives are barely mentioned in this proposal. NZKS claims it would be achievable in 10 years but was too expensive and not yet proven. There is no information about what is happening in other countries and no cost-benefit analysis about off-shore alternatives.
- Rather than pushing this relocation proposal for areas prohibited to aquaculture, MPI and the industry should invest in research to expedite offshore farming as a future-proofed alternative.

5. King shag

- Policy 11 of the NZ Coastal Policy Statement calls for protection of indigenous

species in the coastal environment.

- The NZ King Shag is classified as nationally endangered and is found only in the Marlborough Sounds. It is a taonga for Ngati Kuia and Ngati Koata.

- King Shag are sensitive to disturbance when breeding, roosting and feeding. Duffers Reef to the Waitata Reach, where five new farms are proposed, are key areas for these activities.

- The threat to King Shag was a factor in the BOI restricting the number of new farms in the Waitata Reach to two in its 2013 decision [BOI 1252]. Yet this latest proposal is seeking another five farms in the King Shag foraging area.

6. Landscape and Cumulative effects

- This proposal will degrade the Outstanding Natural Landscapes and High Natural Character values of the Waitata Reach.

- The Board of Inquiry decision identified the threshold number of salmon farms for Waitata Reach as TWO – Waitata and Richmond – and turned down three others because of the cumulative effects on Landscape, Natural Character, King shag feeding and Tangata Whenua values. [BOI 1252]

- NZKS and MPI have ignored this ruling, which was arrived at after a long and considered judicial process. Instead they have joined forces and put forward this relocation proposal for FIVE more farms in the Waitata Reach. None of these farms can be justified.

Further comment:

NZ King Salmon was, following mediation, a signatory to the Marlborough Sounds Resource Management Plan that agreed on areas to be prohibited to aquaculture. The new sites are in areas intended to remain free from aquaculture as supported by numerous Council and Environment Court decisions. The balance of use of the Marlborough Sounds will be tilted further to industrial and unsustainable activities should the proposed relocations proceed. No new areas should be used for aquaculture within the Marlborough Sounds, to protect natural character, land and seascapes, and ecosystems.

Nutrient waste effects from aquaculture in the Marlborough Sounds has not been properly independently assessed and the cumulative effects of anticipated increased nutrients must be properly assessed both for the immediate locality and over parts and the total Sounds area.

In conclusion:

There should be no more salmon farms in the Marlborough Sounds until NZ King Salmon shows it can operate the ones it has within the agreed benthic and independently developed nutrient waste guidelines. Should that be independently proven, then new locations and feed levels should only be agreed through use of fully inclusive, and accessible including appealable public planning process.

Desired outcome: Option C: The Minister does not recommend the proposed regulations.

Written Comment No: 0169

Subject	Fwd: NZKS FARM RELOCATION
From	██████
To	aquaculture submissions
Sent	Thursday, 9 March 2017 3:43 p.m.

> Hello,

>

> I'm here to submit an entry to vote for NZKS farm relocation. I believe with relocated farm we will see significant increase in sustainability in New Zealand, meet best practice guidelines and create jobs in the region. New Zealand is internationally recognized as one of the most, clean, green and untouched regions of the world. I believe this relocation helps perpetuate this reputation and aligns with recognition.

>

> Thanks very much,

> Sonia Buchereau