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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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Subject	Support for Salmon Farm Relocations
From	[REDACTED]
To	aquaculture submissions
Sent	Friday, 17 March 2017 3:15 p.m.

The Salmon Relocation Advisory Panel

Dear Sir, Madam,

I am writing on behalf of the New Zealand School of Commercial Diver Training ("NZSCDT") the countries only commercial diver training establishment teaching ADAS commercial/occupational diving qualifications to AS/NZS 2815.

We understand and fully support the commercial and environmental rationale to move the Marlborough Sound salmon farms and are fully supportive of NZ aquaculture and its stakeholders in assisting the continuous improvement in health and safety of operational diving teams ensuring the most up to date theory and practical methods are known and utilised.

We are ideally positioned to support not only the relocation of the farms but also the continued support of the industry ensuring the currency of aquaculture divers and as a long term employment pathway for graduates of the school. As a New Zealand based school we are able to play a small part in ensuring the aquaculture support/service supply maximises domestic economic value.

In conclusion we strongly support and welcome the wider growth of aquaculture throughout the New Zealand EEZ.

Please don't hesitate to contact us with any questions.

Kind Regards,

Tim

Tim Heeley
NZSCDT School Director

[REDACTED]



[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Part of the Intueri Education Group

Written Comments No: 0256

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Subject	NZTE's submission in support of NZKS
From	[REDACTED]
To	aquaculture submissions
Cc	Lynne Korcheski -NSN
Sent	Friday, 17 March 2017 3:19 p.m.
Attachments	<<Letter to MPI re Salmon Farm Relocation - 17 March 2017 - SIGNED.pdf>>

Good afternoon

Attached is a letter from our Chief Executive, Peter Chrisp, in support of NZKS and the proposed salmon farm relocation proposal.

Kind regards
Kim

Kim Mackie Executive Assistant to Peter Chrisp  NEW ZEALAND TRADE & ENTERPRISE	T [REDACTED]	[REDACTED]	
	W nzte.govt.nz		
	Level 15, The Majestic Centre, 100 Willis Street, Wellington 6011 PO Box 2878, Wellington 6140, New Zealand		
	New Zealand Trade and Enterprise is New Zealand's international business development agency. Our role is to help New Zealand businesses grow into international markets.		

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17 March 2017

Ministry for Primary Industries
Nelson

Submission on Salmon Farm Relocation

New Zealand Trade & Enterprise (NZTE) is the government's international business development agency. Our purpose is to grow companies internationally for the benefit of New Zealand and we do this by helping companies grow bigger, better and faster in international markets.

Our focus is on smart, forward thinking businesses with excellent potential and ambition for international growth – growth that will provide real and lasting benefits for New Zealand. More successful international businesses will provide jobs and raise the standard of living for all New Zealanders.

The New Zealand King Salmon Co Ltd (NZKS) is a very good example of this type of high growth / high value exporter and it is one of the companies NZTE is working closely with in New Zealand and internationally.

As the world's largest producer of King salmon, NZKS is successfully differentiating itself in global markets as a supplier of a branded, premium niche species of salmon in what is largely a commodity market. We believe this represents a significant opportunity for New Zealand. NZKS has a clear global growth strategy which is focused on selling chilled Ora King branded product into the world's best restaurants and Regal smoked salmon into selected global markets.

The future economic growth potential for New Zealand will rely on value added exporters such as NZKS who sell a high margin branded product which is in increasing demand globally.

I am therefore writing in support of NZKS's request to relocate six existing salmon farms in the Marlborough Sounds that would be good for the region and the New Zealand economy. The increased yield that should be delivered by relocating these farms to areas more suitable for King salmon and the improved economic outcomes that would result, will provide a strong platform which will allow NZKS to deliver its growth goals and maximise its international market potential.

I am not seeking a speaking slot at the Advisory Panel hearings.

Kind regards



Peter Chrisp
Chief Executive

T

F

w: nzte.govt.nz

w: newzealand.com/business

Written Comments No: 0024

Subject	King salmon farms
From	[REDACTED] Ozelle Newlove
To	aquaculture submissions
Sent	Monday, 20 February 2017 11:52 a.m.

I have worked at King Salmon for 16 years and think it wonderful idea to shift farms to higher waters as better for enviroment and would create jobs for the reign.

Written Comment No: 0404

Subject	FW: Marlborough Sounds - King Salmon - Proposal for relocation of existing farms - Submissions by Ngati Apa
From	Mark
To	aquaculture submissions
Sent	Friday, 24 March 2017 4:55 p.m.
Attachments	<<Ngati Apa-MPI submissions (lodged).pdf>>

Please find the above referred submission from Ngati Apa ki te Ra To Trust lodged in regard to the proposal for relocation of existing salmon farms within the Marlborough Sounds attached.

Please send an acknowledgement of your receipt of these well prior to the closing time for submissions.

Thank you for your assistance.

Regards

Mark Batchelor

Planning & Resource Management Consultant

Smart Alliances Ltd

Engineering / Resource Management / Architects



Blenheim 7240

W: www.smartalliances.co.nz

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Salmon Farm Relocation
Ministry for Primary Industries
Private Bag 14
Port Nelson 7042
New Zealand.

Sent by e-mail to aquaculture.submissions@mpi.govt.nz

Proposal to amend 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

Submission to Relocation Advisory Panel

Submission by;

Ngāti Apā ki te Rā Tō Trust

Submission prepared by;

Butch Bradley
Chief Executive - Ngāti Apā ki te Rā Tō Trust
Pursuant to delegated authority

Address for service;

Ngāti Apā ki te Rā Tō Trust

[REDACTED]

Blenheim 7240

[REDACTED]

ATTENTION: Butch Bradley – Chief Executive Officer

Speaking Rights;

We wish to be heard in relation to this submission and to present submissions related to any other matters that may arise during the time between lodgement of these submissions and the hearing and during the hearing that may relate to or affect the matters of interest to Ngāti Apā ki te Rā Tō or the submission of Ngāti Apā ki te Rā Tō.

Support or Opposition;

Ngāti Apā ki te Rā Tō Trust opposes the proposals unless the matters presented in this submissions and any further submissions addressed at the hearing are fully satisfied or responded to in a manner that effectively mitigates these effects as they affect Ngāti Apā ki te Rā Tō.

Ngāti Apā ki te Rā Tō Trust is available to discuss matters raised in or that relate to matters raised in this submission.

Submission;

1. Ngāti Apā ki te Rā Tō is aligned with and support other iwi in their concerns regarding the impact of Salmon farming on the environment. In this regard they adopt the submissions of other iwi.
2. In particular, Ngāti Apā ki te Rā Tō support the removal of salmon farms from Tory Channel because of their environmental unsuitability and the special values Tory Channel represents for iwi. Likewise, the inability of the farms to achieve compliance, with the best practice management guidelines for the Marlborough Sounds and the environmental outcomes and performances these prescribe.
3. During the King Salmon Plan Change application proceedings by the Environmental Protection Authority, and previously and ongoing as part of negotiations related to the Treaty of Waitangi settlements process, Ngāti Apā ki te Rā Tō and other iwi were advised there was no more water space available for further marine farming.
4. This advice was also reflected in the decision by Central Government to reach a cash settlement with iwi in compensation for this advice effectively removing this asset from availability to iwi and the Treaty settlement process.
5. Nothing about the Marlborough Sounds has changed since that time that results in changes of a nature or significance since that time to result in more water becoming available.
6. Combination of the proposal to move salmon farms from Tory Channel and there being no available or new water space does not result in changes that make water space in other locations in the Sounds to become suitable, particularly as this water space was originally determined not to be suitable or available.
7. Despite this background, Central Government has entered a process concerned with determining the availability of more water space in areas previously identified as not being suitable or available, which was the basis of proposing a cash settlement with iwi through The Treaty settlement.
8. If the water space subject to this proposal is, despite this background, found to be justifiably made available and is allocated specifically for the purpose of King Salmon, that outcome would be taking further water resource from that which was identified as a

cultural and historical and continuing contemporary resource to Ngāti Apā ki te Rā Tō and other iwi.

9. Any decision that includes abandonment of the farms in Tory Channel and cancellation of their consents, while being arguably the same amount of water space in an accounting sense, does not compensate for this. As the waters of Tory Channel and the new sites are different locations, different waters and as such have different values as a resource. They represent a different asset. Occupation of them will therefore come at a cost to Ngāti Apā ki te Rā Tō and other iwi.
10. Release of Tory Channel water and the water in other sites because of its determined unsuitability is evidence of this difference.
11. The effective outcome is that particular resource provided by these new waters, as distinct from those being released is being removed from the assets available to Ngāti Apā ki te Rā Tō and other iwi. These assets are being removed for the purpose of a specific private interest.
12. Unlike other forms of marine farming such as shell fish farming, the nature of salmon farming also brings an exclusivity of access to the water occupied. While not comprising issue of title, this is the effective practical outcome as a result of the nature of the structures used.
13. This is an effective modern day equivalent of alienation of iwi from its resource by use of governing powers of Central Government to legislatively take asset from iwi for private purposes without compensation that the Treaty settlements have been redressing. The Treaty is again in modern times being contravened.
14. The outcome is Central Government is taking these actions for and on behalf of a single private organisation in a manner that is contrary to the interests of its partnership responsibilities as prescribed by the Treaty of Waitangi. Further in this regard, this proposal is treating a private company as a favoured partner when iwi has this legislated position.
15. Ngāti Apā ki te Rā Tō recognise that Central Government has determined that the marine farming industry is an industry of national importance and as such has determined the procedures provided by Section 360A of the Resource Management Act are appropriate. Ngāti Apā ki te Rā Tō however disagrees with this purpose being able to be correctly interpreted as providing for a single private company such as King Salmon being given an opportunity in a manner that excludes other organisations that may also to utilise any opportunity the process may provide.
16. Use of the 360A process to provide for the benefit of a single organisation is not the purpose of these provisions; they are for the purpose of providing for the management of aquaculture in a manner that might result in opportunity becoming available. They do not provide for allocation of resource to a specific organisation in the manner this proposal does.

17. There may be proposition that the provisions being considered, while referring to King Salmon and being specifically described for, as for that companies purpose, is providing opportunity for the sites for other organisations. The practical reality is this will not be possible in the manner proposed.
18. The points made above, in particular regard to determining whether more water has become available or suitable and that specific sites are found suitable is contrary to the background policy of the operative resource management plan that remains applicable to that water. Which despite being proposed to be distinguished by regulatory means is not distinguishable pursuant to that background policy.
19. Selection of specific sites within that policy framework is an ad-hoc method that does not provide for any further possibilities other than those provided for King Salmon. This is contrary to the statutory policy behind Section 360A, and resource management policy as prescribed by the Resource Management Act, and the principles applying to preparation of statute and regulation. The proposal does not provide a management response that provides an opportunity in tune with Central Government's determination that aquaculture is a matter of national importance. The policy of Section 360A is to the effect of aquaculture not salmon farming and in this regard can therefore not be construed to provide specifically for Salmon farming.

Desired outcomes;

The proposal should be rejected and the effects of this proposal on the interests of the governments Treaty partners and how this relates to the values represented in Treaty settlements need to be considered and activity provided for.


Representation;

Ngāti Apā ki te Rā Tō Trust will be represented by witnesses and representatives appropriate to the matters its submission has presented.

Ngāti Apā ki te Rā Tō will also be representing its submission alongside representations by other iwi.

Time requirements;

We estimate the time we will require to present our submissions is 3 hours, more or less.



.....
Signed by Butch Bradley
On behalf of Ngāti Apā ki te Rā Tō Trust

24 March 2017.
.....
Date

Relocation of Salmon Farms in the Marlborough Sounds

Van Thi Hong Nguyen



I work at King salmon one year and I see how we have grown and I support moving the farms to get healthier fish and we sell more to customers. We will have more jobs for NZ. Moving farms will keep the seabed healthy for our children to enjoy.

Van Nguyen

A handwritten signature in blue ink, appearing to be 'VTH' or similar initials.

①

To Advisory Panel
Marlborough Salmon Farm Expansion,
Ministry for Primary Industries,
Private Bag 14, Port Nelson 7042

Re: NZ King Salmon and MPI proposal to relocate
salmon farms into the Pelorus Sound
From: Nikau Cove Ltd, Kenepuru Sound
Tim Dallas, Dan Tasker, Will Ricketts, Conrad Wedde,
Carlos Wedde.

Submitter : Director- Rose Beauchamp,
[REDACTED] Wellington 6023
Email [REDACTED]

*We wish to be heard at the hearing.

Environmental, ecological and health issues related to
continued salmon farming in the Pelorus Sound.

1. Degraded waterways: One salmon farm produces nitrogenous waste equal to sewerage from a town of 55,000 people (Ben Knight Cawthron Institute June 2 2012) Pelorus Sound has 3M high 'mountains' of salmon faeces and excess feed under farms. Dairy effluent on this scale is not allowable on land.
2. Sedimentation: Estuaries such as Kenepuru Sound - a shallow, non-tidal Sound with 7 year cycle for water renewal - are unable to cope with load put on it already by mussel farm pollution. Further degradation of the water from industrial salmon farming means further degradation for this Sound. (Inlet and outlet for the Kenepuru

through the Pelorus Sound.) There is “no data to show potential effects of nutrient loads within the sediment in the Kenepuru and wider Pelorus.” (Ben Knight, Cawthron Institute Appendix 2 June 2012)

3. Habitat Damage-

Loss of biogenic habitat for snapper spawning (southern most limit Pelorus Sound), wild scallop, mussels, oysters and innumerable native fish species. Destruction ancient sponge forest in the Waitata Reach, Pelorus Sound (Save our Sounds film Danny Boulton)

4. Vaccines & Hormones- Use and presence of

hormone-inducing agents (GnRHa) & testosterone (17-methyl testosterone) in farmed salmon breeding. Impact on wild species unresearched. (Consumer Mag Oct 2013)
Vaccines used for “emerging” bacterial infections cause sterility of marine floor. (The Ecologist July 2002)

5. Death of Salmon- Continuing mortality spikes over past 5 years from King Salmon farms in the Pelorus Sound with suspected cause being ISAV (Infectious Salmon Anaemia Virus). Canadian accredited lab detected “notifiable disease” (ISAV) in NZ King Salmon in 2012. This information redacted by MPI as being ‘commercially sensitive’ until 2014 when Ombudsman, Prof Ron Paterson March 2014 exposed the truth (Ref 339333) ISAV is the salmon virus that decimated the salmon industry in Chile.

6. Pet Food from Diseased Salmon - NZ King Salmon have stated that dead salmon are processed into pet food. This pet food is now 'marketed' as "premium product, 100% NZ-made and is all natural." Brand name Omega Plus. (Pet Food Giveaway Marlborough Express Jan 18 2017)
7. Composition of feed- Australian feed (Skretting Australia) 93% abattoir by-products including bloodmeal from cattle, sheep and pigs and feather meal from poultry processing (Consumer magazine Oct 2013) Plant materials such as faba-bean meal added for extra protein. Fish oil added for omega-3 and astaxanthin, a carotenoid pigment to give salmon distinctive pink flesh colour. (Consumer Magazine Oct 2013)

KEYPOINTS:

(A) Significant damage to marine environment from salmon farming.

Overstocking of salmon plus NZ King Salmon's cavalier attitude to management guidelines, even those set internationally, (ISAV presence) are cause for grave concern for future ecology & well-being of the Pelorus and Kenepuru Sound. Further salmon farms- together with the proliferation of commercial mussel farming, threatens the Pelorus Sound with "irreversible damage" (Raewyn Peart, senior policy analyst Environmental Defence Society, NZ Herald Dec 24 2011)

(B) Questionable nutritional value of NZ King Salmon.
Misinformation and false PR from NZ King Salmon ("Salmon from the pristine waters of the Marlborough Sounds" - New World in-store advertising) has led to the growth of this unsustainable industry. When the public learns both the composition of the feed and the facts about salmon farm degradation of the marine environment they will be outraged at being offered this so- called 'healthy protein' option.

(C) Lessons to be learnt from overseas experience.
In Canada the public are advised to eat salmon once a month due to toxicity. (Salmon Confidential/www.salmonaresacred.com) In Scotland salmon farms moving to offshore pens for colder waters with greater tidal flows. In Chile the decimation and collapse of the salmon industry from presence of ISAV virus involving huge financial loss.
Tasmania's Macquarrie Harbour debacle.
The list goes on.

SUMMARY

We ask that the Advisory Board take full responsibility together with the Marlborough District Council, MPI and residents for safeguarding a healthy & biodiverse marine environment, with marine reserves, and active recovery of degraded sites of former salmon farms.

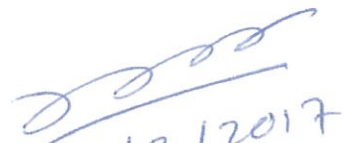
We reject the proposal that any further salmon farms be located in the Pelorus Sound.

Rose Beauchamp for Nikau One Ltd

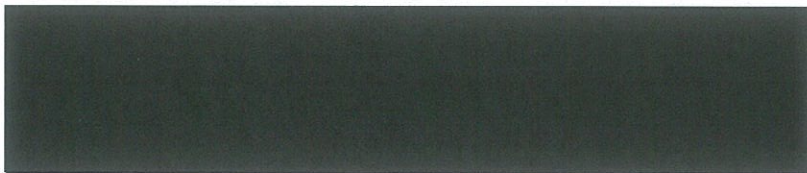
Written Comment No: 0044

Relocating Salmon farms in the Marlborough sounds

My name is Mung No and I have worked at NZKS for 2 years. I am from Burma and I come here for a better life for myself and my family. I agree with moving the salmon farms because it will have good advantages. If we leave them where they are we may lose customers because of bad quality. If we don't pass the Benthic rules we may lose our farms and lose our customers and lose jobs. We could lose the companies reputation. If we move them to high flow water we will grow healthy fish and more fish and will have a good reputation with beautiful safe to eat salmon and this will create more jobs for everyone. When the farms are moved we will have better quality water in the sounds without all the build up of waste ~~the~~ ruining our seabed for other fish and people to swim in.


21/2/2017

Mung NO



Written Comment No: 0126

Subject	Nz king salmon submission
From	Fran Nolan
To	aquaculture submissions
Sent	Monday, 27 February 2017 9:41 p.m.

To whom it concerns,

I Work a lot with both Regal and ora king salmon because I am a local chef at the Vines Village cafe on Rapaura road in Marlborough. In this role I need high quality local produce. It's amazing to have such a fresh quality product that is available on our doorstep. The new farms sound to me like a good environmental move. We pride ourselves at The Vines Village in using local fresh produce and exhibiting the fruits of Marlborough to our visitors from around the world.

The Salmon that is raised in Marlborough is top quality.

Fran Nolan
Head Chef
The Vines Village Cafe

Written Comment No: 0356

Subject	
From	Tom Hollings
To	aquaculture.submissions@mpi.govt.nz
Sent	Tuesday, 28 March 2017 8:13 a.m.
Attachments	<<SalmonMarlb170324.docx>>

Hi MPI

NZOIA submission re Salmon Relocation is attached.

Kindest regards

Tom Hollings

For NZOIA

[REDACTED], Auckland 0654

[REDACTED]



New Zealand Oyster Industry Association

Written Comment No: 0356

Salmon Farm Relocation
Ministry for Primary Industries
Private Bag 14
Port Nelson 7042
& by email to aquaculture.submissions@mpi.govt.nz

Th. 23/3/17

To: The Salmon Relocation Advisory Panel

The New Zealand Oyster Industry Association represents all the participants farming, processing, and exporting farmed oysters in New Zealand.

We have marine farming consents for our oyster farms in a similar way to New Zealand King Salmon (NZKS).

We support the concept of significant decisions on marine farming zoning being made in a coherent joined-up planning approach, rather than on a consent by consent basis.

The relocation of NZKS farms from areas of possible significant impact to areas with much less impact is a good thing as it offers a win/win for everyone involved. There will be less negative impact on the environment which is a win for the people concerned about the quality and character of the Sounds, and fish health and productivity will be improved which is a win for the salmon farming company. The wider community will also benefit from the increased employment opportunities in smaller centres, as well as Blenheim and Nelson.

The panel should be trying to implement the recommendations of the Marlborough Salmon Working Group while at the same time considering the wider interests of the community and the investment NZKS has made and will make in future.

This leaves only the recommended option of relocating the farms to more suitable sites. There is no increase in salmon farming area proposed, rather making sure the area already allocated to salmon farming gives the best possible outcome for all concerned. There has been public input into all the elements that go into the decision to move the farms and these elements reflect that. In the end a decision has to be made using the elements.

We would like to see the independent expert panel make a recommendation similar to Outcome One on P5 of the consultation document.

Kind regards

Jim Dollimore

President NZOIA

NZ Oyster Industry Association Inc.

President: Jim Dollimore

Executive: Don Collier (VP)

Andy Elliot

Lisa Hay

Nat Upchurch

Secretary: Tom Hollings

Mail: [redacted], Auckland 0654. [redacted]

Callum McCallum (IPP)

Ben Haig

Ben Warren