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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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Written Comment No: 0514

Subject	I am sharing 'Potential_Relocation_of_Salmon_Farms_in_the_Marlborough_Sounds.docx' with you from OneDrive - Personal
From	Pete Wilkinson
To	aquaculture submissions
Sent	Sunday, 26 March 2017 7:42 p.m.
Attachments	<<Potential_Relocation_of_Salmon_Farms_in_the_Marlborough_Sounds.docx>>

Shared from Word for Android

<https://office.com/getword>

Potential Relocation of Salmon Farms in the Marlborough Sounds

COMMENTS FORM

Comments closes 5pm, 27 March, 2017

Your details

NAME: Pete Wilkinson

ORGANISATION (if applicable):

CONTACT PERSON:

POSTAL ADDRESS: [REDACTED] BLENHEIM

EMAIL: [REDACTED]

DAYTIME PHONE: [REDACTED]

MOBILE: [REDACTED]

NO I do not want to speak to my comments at a public hearing

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

DATE: 26/3/2017

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 Zealand, usurping the power of local authorities and wishes of local communities.
2. Precautionary approach	<ul style="list-style-type: none"> • 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.

	<ul style="list-style-type: none"> In the meantime reduce the feed and stocking rates at the low flow sites to meet the Benthic Guidelines.
3. Nitrogen pollution	<ul style="list-style-type: none"> 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.¹ 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	<ul style="list-style-type: none"> 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]

¹ BOI [par 379] Nitrogen equivalent calculations

	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • This proposal will degrade the Outstanding Natural Landscapes and High Natural Character values of the Waitata Reach. ² • The Board of Inquiry decision identified the

² Marlborough Landscape Study August 2015 by Boffa Miskell and Marlborough District Council, page 108; Natural Character of the Marlborough Coast, Defining and Mapping the Marlborough Coastal Environment, June 2014 by MDC, Boffa Miskell, DOC, Landcare Research and Lucas Associates, page 75.

Written Comment No: 0514

	<p>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]</p> <ul style="list-style-type: none">• 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.
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Further comment:

We are not so desperate here in New Zealand that we need to exploit and degrade and make money from every last vestige of natural resource and habitat.

This unique area of New Zealand called the Marlborough Sounds is not Factory farm suitable and should be valued and protected for future generations.

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 guidelines.

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

Written Comment No: 0014

Subject	Potential relocation of salmon farms in Marlborough Sounds
From	[REDACTED]
To	aquaculture submissions
Sent	Thursday, 16 February 2017 7:49 a.m.

I have been working for NZ King Salmon for 9 years and have progressed up through the ranks. I support the relocation of the 6 farms to the new site because it is better for the environment and will reduce waste on the sea floor. This will create more jobs by having more quantity and more better quality of salmon. This could also bring up Tourism around the new area in Marlborough. So in the end I'm all for it. I love my job and would like to keep it.

Regards
Suliana Wilson

Written Comments No: 0210

Subject	MARLBOROUGH RELOCATION of SALMON FARMS
From	[REDACTED]
To	aquaculture submissions
Sent	Wednesday, 15 March 2017 11:34 a.m.

Dear sirs,

I have read the above submission and **fully support** its objectives in improving environment and commercial outcomes for N.Z.

Roy Wilson

[REDACTED]

Written Comments No: 0286

Subject	Consultation proposal for relocation of salmon farms in the Marlborough Sounds
From	Christopher Wilson
To	aquaculture submissions
Sent	Wednesday, 22 March 2017 1:16 PM

My wife and I wish to STRENUOUSLY OPPOSE this proposal.

We are dismayed and astonished that the Government is prepared to short circuit due process in order to benefit the salmon company.

We consider that salmon farming is detrimental to the Sounds that we have loved for over fifty years. A recently released OECD report found that an economy dependent on natural resources was taking its toll. Also; "There is mounting tension between increasing the economic contribution of the primary production sector and improving environmental quality". Salmon farming in the Marlborough Sounds is exactly a case in point.

In addition to the visual, chemical and biological pollution, we consider the positioning of the proposed site (3) in mid-channel is hazardous.

I say this as a former operator of a commercial charter boat in the Sounds, and would seriously question the credentials, motivation and experience of any individual or company suggesting otherwise. I would suggest that the conclusions reached by Navigatus in this regard illustrate the truth of the old saying that he who pays the piper calls the tune.

Christopher Wilson

[REDACTED] Blenheim 7201

[REDACTED]

Written Comment No: 0577

Subject	Salmon farm relocation proposal
From	John Wilson
To	aquaculture submissions
Sent	Monday, 27 March 2017 2:35 p.m.
Attachments	<<Potential-Relocation-of-Salmon-Farms-in-the-Marlborough-Sounds-Feedback-form John Wilson March 2017.pdf>>

Hi, please see the attached feedback form.

John

John Wilson Consulting Limited



Written Comment No: 0577

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 Comment No: 0577

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 checked="" type="checkbox"/>	I do not want to speak to my written comments at a public hearing

Submission from John Wilson

[REDACTED]
Nelson 7011

[REDACTED]

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

There are large economic benefits from better utilising the available resource. Any costs will be

adequately offset by the removal of existing farms and the economic benefits.

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?

All of them

Question 4:

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

I have read the executive summaries of many of the technical reports

Any concerns I did have seem to have been addressed

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?

The assessments are based on the proposed surface areas, monitoring of effects will indicate

whether there is scope to increase surface area in future.

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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?

These sites should remain open to consent applications for other forms of aquaculture

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?

I think there should be a presumption that development continues through stages but with monitoring to confirm that effects are in line with specified limits

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?

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?

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 expect that the effects on water quality will be readily acommodated in the environment,

this will be assisted by the use of these high current sites with adequate depth.

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?

Only a small proportion of a common type of habitat will be affected

Appropriate limits to effects and monitoring of effects will provide adequate protection

Ultimately negative effects on the farm if the seabed were to become highly enriched would

limit development and limit further effects.

Question 24:

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

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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 be 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?

I understand highflow sites are much better for salmon health and welfare

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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?

The navigational assessment appears to deal adequately with this question

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?

MPI should consider that there are both positive and negative effects on tourism from

aquaculture development. Tourists are interested in seeing both land and marine farms as well

as scenery.

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?

Include one or more of the salmon farms as part of the tourism activity

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?

Written Comment No: 0577

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

I have confidence that the advisory panel will be able to provide the Ministry with sound
advice and recommendations on this proposal.

Written Comment No: 0577

This image shows a full page of white paper with horizontal blue ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.

Written Comments No: 0148

Subject	Salmon Farm Relocation
From	[REDACTED]
To	aquaculture submissions
Sent	Friday, 3 March 2017 9:45 a.m.

Submission From; Murray Win. Retired.

[REDACTED]

I do not wish to speak on my submission.

I support the proposal to relocate the farms.

The salmon industry is an important employer in the Nelson/Marlborough area and the industry must be maintained, supported and enhanced at every opportunity. The moving of the farms to more environmentally friendly sites and sites that better suit the well being and growth of the fish stock is an action that should be applauded by all interested parties.

I am active in assisting refugees in Nelson to find work and NZ King Salmon are an important provider of opportunity and work. NZ King Salmon is a large employer and from my experiences with the industry is a good employer.

The economic activity produced by NZ King Salmon is very significant and important to Nelson and must be supported and not in any way inhibited.

Murray Win

Written Comment No:0583

Subject	Salmon Farm Relocation
From	Riki Winitana
To	aquaculture submissions
Sent	Monday, 27 March 2017 2:56 p.m.

To: The Salmon Relocation Advisory Panel

My Name is Riki Winitana, i am a 34 Year old Male from Marlborough. I have two children ages 5 and 8 and happily Married to Lisa Winitana.

I am an employee of New Zealand King Salmon, (Aquaculture Technician at Ruakaka Salmon Farm).

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 flow water 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 sea bed which will have positive environmental benefits.

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

There will be more direct 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 especially from a navigation viewpoint.

What will this mean for me and my family, if the relocation of the sea farms are not approved, it could potentially put me out of a job which would be devastating. I own my own home, i am a rate payer here in Marlborough but also this will place a lot of pressure on myself and Wife to provide for our family.

This will affect my fellow team mates but also their family's as well if the relocation doesn't go ahead.

To finish this off i do believe that this NZKS company is a very good company to work for. I am of Maori descent and we believe we are the caregivers of the land. New Zealand King salmon fits into this belief and is heading into the right directions.

Regards,

Rick

I would not like to be heard by the hearings panel

Written Comments No: 0232

Subject	Salmon Farms Relocation Submission
From	[REDACTED]
To	aquaculture submissions
Sent	Thursday, 16 March 2017 4:42 p.m.
Attachments	<<MPI submission 2017-03.pdf>>

Please find attached my submission

Kind regards

Jeff Winter



16 March 2017

Salmon Farm Relocation
Ministry of Primary Industries
Private Bag 14
Port Nelson 7042

aquaculture.submissions@mpi.govt.nz

To: The Marlborough Salmon Farm Relocation Advisory Panel

My name is Jeff Winter, and I have worked for New Zealand King Salmon for nearly 14 years in a number of finance roles in Nelson. My roles have encompassed financial accounting, company insurances, periodic insurance valuations, fixed assets, capital expenditure budgeting and tracking, and for the last six or seven years as the Treasury and Risk Management Accountant.

These roles have enabled me to interact with many areas of the business, and in particular with the Aquaculture team and our sea farming operations. I have always been impressed by the dedication and passion that King Salmon aquaculture team members have for raising the best salmon in the world, and doing so in a way that cares about the impact on the local environment and community in the Marlborough Sounds.

I strongly support the MPI's proposal for potential relocation of salmon farms in the Marlborough Sounds as I believe that as well as being beneficial to producing really world class salmon, the environmental and social benefits are also great.

There are a number of low flow sites which, in addition to being sub-optimal for growing the world's best salmon, are also in areas used for recreation and baches. Relocating these farms to more remote areas is hugely beneficial by reducing the number of baches near a sea farm to a very small number, and could make Queen Charlotte Sound free of commercial operations. As a former recreational fisherman in the Marlborough Sounds I support this concept.

Relocating the low flow site sea farms also makes environmental sense by having less effect on the seabed. And with the effects of global warming likely to affect water temperatures, a move to higher flow sites provides an opportunity to develop truly sustainable, long term, aquaculture in the Marlborough Sounds. The environmental, social and economic benefits are well covered in the information MPI has made available on their website.

New Zealand is an island nation, and aquaculture is a growing part of our economy. But some regions can struggle to achieve consistent or significant economic growth. The Government wants to develop aquaculture to a billion dollar a year industry, and the high flow water space identified

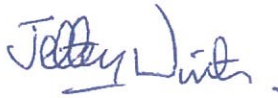
Written Comments No: 0232

by MPI would be a big step to growing the industry, and our region, in a sustainable, long term, and economically successfully way.

I strongly urge the panel to make a positive recommendation to allow the relocation of the identified salmon farms to the high flow sites.

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

Yours faithfully

A handwritten signature in blue ink that reads "Jeff Winter". The signature is written in a cursive, slightly slanted style.

Jeff Winter



Written Comment No:0586

Subject	Emailing - 170306-SubmissionForm.pdf
From	Ross and Sylvia Withell
To	aquaculture submissions
Sent	Monday, 27 March 2017 2:41 p.m.
Attachments	<<170306-SubmissionForm.pdf>>

I live with my husband, Ross, near Portage in Kenepuru Sound. We have lived here permanently since 2007, but owned the property since 2003. We moved here because we enjoy the wild beauty of the Sounds.

I wish to make the following comments:- Good decision making should be based on facts that have already been proven, and consideration of many variables that can give a positive outcome. To me, there are a lot of doubts around several important areas.

1. Pollution:- Monitoring results have not been published yet regarding the two new farms in the Pelorus, to show whether good water health can be maintained. There is doubt, about the sustainable level of good water 'health'.

There will be difficulties with navigation issues. Small boats, in choppy water may find it less easy, to see 'low profile' sea farms. At night, 'subtle lighting' just will not happen. The night lights on the sea farms will have to be very bright - for safety reasons. The 'dark night sky' is highly valued now, and this will be lost in the outer Pelorus.

The effects on the natural environment: - Bird life, sea mammals and marine life biodiversity are not beneficial, so there is doubt about actual positive effects on the environment! eg. continuous bright underwater night lights may well affect the wild fish stocks.

2. Loss of the WILDERNESS AREA. The main attraction for residents, local visitors and overseas tourists, are the wild areas in the Sounds. Pollution will put people off visiting. They will go elsewhere.

3. In 2012, two sites were unacceptable, Kaitira and Tapipi, because they would 'dominate' the entrance to Pelorus Sound. Why, five years later, are now, three being proposed? Would that not be more 'dominant'? Have factors changed so much in five years? Have the financial benefits changed? Has the Aquaculture Industry changed that much, that the 2012 decision needs to be revisited? Why spoil, such a centrally located wild area in New Zealand, for such a small benefit for a few people.

S C Withell

Written Comment No:0586

To: Salmon Farm Expansion
Ministry for Primary Industries
Private Bag 14
Port Nelson 7042

Email before 5pm, Monday 27 March 2017
to:
aquaculture.submissions@mpi.govt.nz

Written Comment No:0586

**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	Sylvia Catherine Withell		
Address	<div style="background-color: black; width: 150px; height: 1.2em; margin-bottom: 2px;"></div> Picton 7282		
Email	<div style="background-color: black; width: 150px; height: 1.2em;"></div>		
Telephone (day)	<div style="background-color: black; width: 100px; height: 1.2em;"></div>	Mobile	<div style="background-color: black; width: 100px; height: 1.2em;"></div>

<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 <div style="border: 1px solid black; width: 150px; height: 1.2em; display: inline-block;"></div>
<input 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.

Written Comment No:0586

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:

I live with my husband, Ross, near Portage in Kenepuru Sound. We have lived here permanently since 2007, but owned the property since 2003. We moved here because we enjoy the wild beauty of the Sounds.

I wish to make the following comments:- Good decision making should be based on facts that have already been proven, and consideration of many variables that can give a positive outcome. To me, there are a lot of doubts around several important areas.

1. Pollution:- Monitoring results have not been published yet regarding the two new farms in the Pelorus, to show whether good water health can be maintained. There is doubt, about the sustainable level of good water 'health'. There will be difficulties with navigation issues. Small boats, in choppy water may find it less easy, to see 'low profile' sea farms. At night, 'subtle lighting' just will not happen. The night lights on the sea farms will have to be very bright - for safety reasons. The 'dark night sky' is highly valued now, and this will be lost in the outer Pelorus.

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

Written Comment No: 0162

Subject	Potential Relocation of Salmon Farms in the Marlborough Sounds__Oyster Bay
From	[REDACTED]
To	aquaculture submissions
Cc	'DAVE GRIFFITHS'; 'Pat {Duncan Patterson}'; 'Jo Withers'
Sent	Wednesday, 8 March 2017 3:26 p.m.

Hi

We are current owners of a bach and land within Oyster Bay in the Tory Channel. We wish to express our views on the potential relocation of a salmon Farm at the entrance to Oyster Bay.

We do not have enough knowledge or understanding of the other proposed sites, and only wish to comment on the Oyster Bay proposed salmon farm site.

We have owned our property in Oyster Bay for approx 7 years, and decided on buying there due to the low number of baches in the bay, and the possibility it would remain that way due to the land boundaries, the largely untouched beaches and coves within the bay, and the close proximity to recreational fishing areas around Tio Point and Motukina Point at the entrance to Oyster Bay.

We are not against the farming of salmon in the Marlborough Sounds, or other commercial activity within the sounds, and we fully understand the economic benefits and spin offs to Marlborough and the NZ economy, however we do object specifically to the proposed Oyster Bay site on the following grounds:

- The Oyster Bay Farm site is right at the entrance to the bay, in the middle of the main boat access route into the bay
- There is potential for farm waste and rubbish to wash up on the beaches in the head of the bay
- Predominant winds, sea current and tide all currently take all manner of objects and matter into the bay and surrounding beaches
- The Farm site appears to be located right on a prime and well known blue cod fishing zone and holes. This area has been fished for decades by a multitude of people and is well known to produce some of the best blue Cod fishing within Tory Channel
- The proposed farm site is also right on well known terakihi fishing grounds
- The Proposed farm site appears to be located on a well known recreational diving area, used by multiple people
- Noise from the farm will likely carry to our bach and surrounding area
- There is a negative visual aspect- e.g. The entrance to Oyster Bay is a much photographed location by visitors to Oyster Bay
- There is potential for our property to be devalued

We ask that these points are taken into consideration, and that alternatives to the proposed Oyster Bay Salmon Farm location are fully explored. We are happy to speak further on these comments, and are open to any further discussions.
I can be contacted on the details below.

Regards

Written Comment No: 0162

Andrew and Joanne Withers

[REDACTED]

[REDACTED]

Phone/Fax: [REDACTED]

Cellular: [REDACTED]

[REDACTED]

Written Comment No: 0152

Subject	Marlborough salmon farm relocation project
From	[REDACTED]
To	aquaculture submissions
Sent	Monday, 6 March 2017 1:07 p.m.

Good afternoon

I wish to show my support for this proposed farm relocation.

Aquaculture presents massive opportunities for New Zealand. Being able to increase our Aquaculture capacity whilst reducing the impact on the environment make this proposal a no brainer... let's make it happen!

Regards

Ben Witty

[REDACTED]

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Written Comment No: 0123

Subject	Proposal to Relocate King Salmon Farms in Marlborough Sounds
From	[REDACTED]
To	aquaculture submissions
Sent	Friday, 24 February 2017 3:55 p.m.

I'm Submitting that I'm FOR the Salmon Farms to be Relocated, Faster flowing sites are better for the fish and the environment. By moving the farms New Zealand King Salmon will meet their environmental guidelines.

Also the benefit of this is not only environmental but also economical, bringing more jobs to both the Marlborough and Tasman Regions as well as more Money.

I think it would be madness not to move them.

Yours Sincerely

Kala Wray

Wakefield, Tasman.

Written Comment No: 0155

Subject	Submission - in favour of Farm Relocations
From	[REDACTED]
To	aquaculture submissions
Sent	Monday, 6 March 2017 8:35 p.m.

I wish to state my total support for the relocation of the New Zealand King Salmon low flow sea farms.

This is an incredibly positive investment that will support the top of the south community for decades.

With over ten years work experience in the fishing industry and over 5 years in quota management I know the diminishing state of many common fish stocks.

Fish farming is the future and as the global population continues to grow, our existence will be dependent on companies like New Zealand King Salmon, that strive to meet a balance between preserving our natural resources and producing a quality product that can meet global demand.

Kind Regards
David Wright

Written Comment No: 0357

Subject	Emailing - Scan_20170327.pdf
From	Richard & Chrissie Wright
To	aquaculture submissions
Sent	Monday, 27 March 2017 12:35 p.m.
Attachments	<<Scan_20170327.pdf>>

Submission attached

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

aquaculture.submissions@mpi.govt.nz

Submission on proposed use of Section 360A of the RMA to allow relocation of Salmon Farming in the Marlborough Sounds

To: The Salmon Relocation Advisory Panel

As owners of the only bach in Horseshoe Bay in Pelorus Sound we write to express our opposition against the relocation process being proposed by MPI because we believe the salmon farm relocation will have numerous adverse effects in some of the chosen sites.

We 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 is suggested that it will have a lower level of effect on the seabed which will have positive environmental benefits. However, we do **not** agree that this is the case with the site chosen in Horseshoe Bay. It is the site with the lowest flow of all the proposed sites and where there are a good number of scallops to be found on the seafloor and we have found this site to be the best fishing spot in the bay and are very concerned of the environmental effect that a salmon farm will have to the sea life below. We are also aware that Salmon Farms attract sharks and seals to the area. Whilst we do not mind seals, we are not so keen on sharks.

The main reason we purchased our property in Horseshoe bay was because of the fact that it was the only house in the bay – a very rare thing in the Marlborough Sounds, and now we face the prospect of an ugly salmon farm with accommodation barge and the noise and activity that comes with it.

With 9 mussel farms already in the small bay, marine farming is already at a maximum and navigation is also an issue. It is also worth noting that the potential site in Horseshoe Bay is within foraging distance for the main Duffers Reach King Shag colony.

We urge you to reconsider this site in Horseshoe Bay.

We do not wish to speak to our written submission at a public hearing.

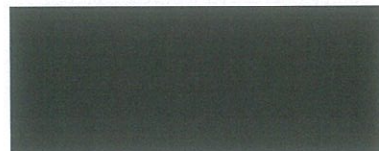
Yours sincerely,



Richard & Chrissie Wright

Date: 27 March 2017

Address: [REDACTED] Ashburton 7771



Written Comment No: 0435

Subject	NZKS Salmon Farms Relocation
From	[REDACTED]
To	aquaculture submissions
Sent	Monday, 27 March 2017 10:44 a.m.

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

aquaculture.submissions@mpi.govt.nz

To: The Salmon Relocation Advisory Panel

Owain Wynn-Jones, European Sales, Uk

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 think that it is better for everyone that we help and promote aquaculture around the world, and in doing so supporting farms which are continuously looking to bring a positive change to their environment. 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. 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.

Many Thanks
Owain