

## Contents Page: Gowland - Griffiths

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

Written Comments Number	Last Name	First Name
273	Gowland	David
503	Grab	Franzi
491	Graeme Dingle Foundation Marlborough	
307	Graham	Neil
58	Grant	Henare
334	Graphic Laminations and Coatings Ltd	
375	Greenhough	Timothy and Jane
7	Griffiths	Liz

## Written Comments No: 0273

Subject	Fwd: Message from
From	[REDACTED]
To	aquaculture submissions
Sent	Tuesday, 21 March 2017 10:36 a.m.
Attachments	<<SKMBT_C35170321081800.pdf>>

----- Forwarded message -----

From: [REDACTED]

Date: 2017-03-21 9:18 GMT+13:00

Subject: Message from

To: [REDACTED]

[REDACTED] Environmental Project Manager

 New Zealand King Salmon



M: [REDACTED] W: [www.kingsalmon.co.nz](http://www.kingsalmon.co.nz) | A: 93 Beatty Street, Tahunanui, 7011



ŌRA KING™

# Written Comments No: 0273

Salmon Farm Relocation

Ministry for Primary Industries

Private Bag 14

Port Nelson

aquaculture.submissions@mpi.govt.nz

To: The Salmon Relocation Advisory Panel

## Introduction – who you are / where you work / and your role

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 for 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 especially from a navigation viewpoint.

## What will this mean to you, and how will this affect your community or organisation?

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.....

I ~~would~~/would not like to be heard by the hearings panel (please cross out the option that does not apply to you).

Name: David Goulard

Organisation/Company:

Role:

Email:

Phone:

Date: 16/02/17

## Written Comment No: 0503

Subject	Potential relocation of salmon farms in the Marlborough Sounds
From	<a href="#">Franzi Grab</a>
To	aquaculture submissions
Sent	Sunday, 26 March 2017 5:31 p.m.
Attachments	<<Potential_Relocation_of_Salmon_Farms_in_the_Marlborough_Sounds.pdf>>

Please receive my submission to the proposal of the potential relocation of salmon farms in the Marlborough Sounds.

Regards,  
Franzi Grab

[REDACTED]

Blenheim 7273

[REDACTED]



## Potential Relocation of Salmon Farms in the Marlborough Sounds

### COMMENTS FORM

Comments closes 5pm, 27 March, 2017

#### Your details

NAME: Franz Grab

ORGANISATION (if applicable):

CONTACT PERSON: Franz Grab

POSTAL ADDRESS: [REDACTED] Blenheim 7273

EMAIL: [REDACTED]

DAYTIME PHONE: [REDACTED]

MOBILE:

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

Comments sent to: [aquaculture.submissions@mpi.govt.nz](mailto: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"><li>• The use of Section 360A of the RMA gives the Minister of Aquaculture the power to over-ride the Marlborough Sounds Resource Management Plan.</li><li>• It takes decision-making and resource management away from the Marlborough District Council and local community.</li><li>• 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.</li><li>• 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.</li><li>• 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.</li></ul>
2. Precautionary approach	<ul style="list-style-type: none"><li>• Policy 3 of the NZ Coastal Policy Statement calls for a precautionary approach. This was reinforced by the BOI decision [par 179].</li><li>• 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]</li><li>• This especially applies to Tio Point, which would be the fourth salmon farm in close proximity in Tory Channel.</li><li>• In the meantime reduce the feed and stocking rates at the low flow sites to meet the Benthic Guidelines.</li></ul>

<p>3. Nitrogen pollution</p>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• The proposed relocation sites are not “existing aquaculture space”. They are <b>prohibited</b> to aquaculture.</li> <li>• While farm surface area may remain about the same, there is a proposed five-fold increase in fish feed to 24,600T a year.</li> <li>• 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.<sup>1</sup></li> <li>• 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.</li> <li>• 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.</li> </ul>
<p>4. Offshore Alternatives</p>	<ul style="list-style-type: none"> <li>• 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. <b>“Particularly where the applicant for a plan change is seeking exclusive use of a public resource for private gain.”</b> [SC 172-173]</li> <li>• 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</li> </ul>

<sup>1</sup> BOI [par 379] Nitrogen equivalent calculations



	<p>Norway.</p> <ul style="list-style-type: none"> <li>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.</li> <li>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.</li> </ul>
5. King shag	<ul style="list-style-type: none"> <li>Policy 11 of the NZ Coastal Policy Statement calls for protection of indigenous species in the coastal environment.</li> <li>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.</li> <li>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.</li> <li>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.</li> </ul>
6. Landscape and Cumulative effects	<ul style="list-style-type: none"> <li>This proposal will degrade the Outstanding Natural Landscapes and High Natural Character values of the Waitata Reach.<sup>2</sup></li> <li>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]</li> <li>NZKS and MPI have ignored this ruling, which was arrived at after a long and considered judicial</li> </ul>

<sup>2</sup> 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.

	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:**

This proposed relocation of salmon farms is effectively a big expansion of salmon farming in the Marlborough Sounds. Even though the proposed changes may not increase the total surface area occupied by salmon farm structures, there would be a huge increase in production and consequently increased pressure on the environment. Before salmon farming can be extended it is essential that more scientific data is collected to assess the environmental impact of salmon farming on the wider ecosystem of the Marlborough Sounds. This includes but is not limited to how the nutrients from salmon excrements and wasted salmon feed are dispersed through the Pelorus Sound and Tory Channel. This is in an environment that is already under pressure from sedimentation from runoff caused by forestry and agriculture. Future developments such as increasing sea temperatures and climate change also have to be taken into account.

Community groups have put lots of effort, money and hours into previous consultation rounds about the expansion of salmon farming, mainly voluntary work without any monetary benefit for the people involved. It is therefore immensely disappointing that the outcomes of previous consultation rounds are disregarded in this proposal.

### **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 and we have a better understanding of the impact of these farms on the wider ecosystem of the Marlborough Sounds.

**Desired outcome:** Option 3: It is recommended that the regulations under section 360A are not made.

Relocation of Salmon Farms in the Marlborough Sounds

Henare Grant

I have been at NZKS for 4months. I support moving farms to faster water flow because the healthier our salmon and our country is the better for my family. More jobs more job security and better for Nelson/Marlborough areas.

Henare Grant 20/02/2017



## Written Comment No:0491

Subject	Submission attached
From	<a href="#">Kelvin Watt</a>
To	aquaculture submissions
Sent	Monday, 27 March 2017 7:15 a.m.
Attachments	<<Salmon Farm Advisory - March 2017.pdf>>

Please find submission attached. Many thanks.

Kind regards

Kelvin Watt  
Regional Manager

**Graeme Dingle Foundation Marlborough**



[www.dinglefoundation.org.nz](http://www.dinglefoundation.org.nz)

PO Box 276, Blenheim, 7240

Level 1, Stadium 2000, Kinross St, Blenheim 7201



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

[aquaculture.submissions@mpi.govt.nz](mailto:aquaculture.submissions@mpi.govt.nz)

27<sup>th</sup> March 2017

To: The Salmon Relocation Advisory Panel

I am writing in support of the salmon farm relocation process being proposed by MPI. I am Regional Manager of Graeme Dingle Foundation Marlborough, which, as a local charitable trust, has worked alongside and taken a keen interest in, the local aquaculture industry over a number of years.

I support the potential salmon relocation process because I believe it will provide for better outcomes in the region on a number of levels.

### **Community**

The aquaculture industry continues to be a key supporter of community organisations and initiatives across a spectrum of areas (young people, sport, environmental, tourism and cultural events) across the Marlborough region. Improving the capability of salmon farming and the economic improvements to flow from that, will have a resulting benefit to the surrounding communities.

King Salmon has been a partner of Graeme Dingle Foundation Marlborough (previously Foundation for Youth Development Marlborough) for over 5 years. Over that time they have shown a real interest in our child and youth development programmes, especially our values and life skills Kiwi Can programme - that now impacts 40% of primary-aged kids across the region.

This has even been demonstrated in practical hands-on involvement, one example of which was King Salmon staff visiting Picton School and providing an in-depth demonstration on salmon, salmon farming and environmental considerations in the Marlborough Sounds.

### **Economy**

I understand that 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. Our programmes focus on growing kids that have improved social connectedness, can work together, challenge themselves and have the resilience to keep going when things get tough. In essence we are building key skill sets for the workforce of tomorrow. We also aim to build connections and enduring links with the local community.

# Written Comment No:0491

In supporting this proposal, we are supporting local job growth in an ever-developing industry – this is where we hope the children in our programmes will live and work in the future.

## **Environmental**

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.

In addition to this, I have seen first-hand the new salmon farming structures and have been impressed with the low visual impact that they have.

As our organisation and our impact across local communities has grown over recent years (our Kiwi Can programme now reaches 1700 Marlborough kids every week), the aquaculture industry, including King Salmon, has been a key supporter and promoter of the work that we do with local young people. As outlined above, on a community, economic and environmental basis, I would like to indicate our support for the proposed salmon farm relocation process.

Kind Regards,

**Kelvin Watt**

Regional Manager,

Graeme Dingle Foundation Marlborough

Graeme Dingle Foundation – Marlborough  
Stadium 2000, Kinross Street, Blenheim; PO Box 276, Blenheim 7240

  
e [office.marlborough@dinglefoundation.org.nz](mailto:office.marlborough@dinglefoundation.org.nz) w [www.dinglefoundation.org.nz](http://www.dinglefoundation.org.nz)

## Written Comments No: 0307

Subject	MPI Site Swap
From	<a href="#">Neil Graham</a>
To	aquaculture submissions
Sent	Thursday, 23 March 2017 12:11 PM
Attachments	<<Submission 23 March 2017 .docx>>

Please see my submission  
Kind regards

Neil Graham, *Engineering Manager*



M: [REDACTED] | W: [www.kingsalmon.co.nz](http://www.kingsalmon.co.nz) | A: 10 - 18 Bullen Street, Tahunanui, Nelson 7011



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Salmon Farm Relocation

Ministry for Primary Industries

Private Bag 14

Port Nelson

aquaculture.submissions@mpi.govt.nz

To: The Salmon Relocation Advisory Panel

**Neil Graham, Engineering Manager, NZKS**

I have been working with NZKS for over 11 years now and in this time I have seen many changes throughout our operations across both sea farms and processing / supply chain.

The significant benefits to our local economy from the existing day to day operations is something that we must maintain and grow as we look to support MPI as they seek approval for the water space swap process. I personally have been responsible for increasing my team of trade qualified engineers, electricians and administration, from 5 in 2005 (Picton & Nelson combined) to 14 (picton & Nelson combined). This recruitment has provided new opportunities for families in the top of the south and also we have brought in new staff from outside the region who have brought families and settled here which as you know is helping to build the community. The contractors and suppliers who have also benefited from our operations across the top of the south who I have been involved with from our one man specialist operator, through to our major national and international suppliers and manufactures all contribute to our local and nation wide economy.

The business is a big employer of our local students in holiday / summer jobs and has done for many years. My own son has been employed for three summers and some mid year breaks as work load and demand allow. This student recruitment spreads across many different areas of the business and gives many of them skills from business to take back to their studies the following year. From this we are looking long term to take some of these students back into the business once their degrees are complete.

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 would like to see the potential relocation process follow the priority rating of the following:

1. Crail Bay MFL 048, Crail Bay MFL 032
2. Forsyth Bay
3. Otanerau
4. Ruakaka Bay
5. Waihinau bay

The impact on the environment and our business will be managed well, if the approval process

## Written Comments No: 0307

agrees to this priority.

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

Yours sincerely

Neil Graham



Relocation of Salmon Farms in the Marlborough Sounds

Henare Grant



I have been at NZKS for 4months. I support moving farms to faster water flow because the healthier our salmon and our country is the better for my family. More jobs more job security and better for Nelson/Marlborough areas.

Agant 20/02/2017

Subject	<b>Potential Salmon farm relocation.</b>
From	<a href="#">Gary Mathers</a>
To	aquaculture submissions
Sent	Monday, 27 March 2017 1:49 PM

To whom it may concern,

I am in favour of relocation of Salmon farms in to deeper water and high flow areas helping the environment and potentially increasing the output of more Salmon while meeting the requirements of Benthic guidelines.

We as a company currently supply Salmon boards to NZKS which helps keep three people employed in our Petone plant and two people in our Auckland plant.

I also had the pleasure of spending a couple of months cruising around the Marlborough sounds this year on a yacht and got to see a lot of the Salmon farms first hand, and visited a lot of the spots that are proposed relocation spots, from a boaties point of view, the farms would be a lot better situated in deeper water with high currents(flow) as these are places that we are unlikely to anchor in where as the sheltered and low current (flow) areas we would .

After reading the proposal and visiting the Marlborough sounds I can only see this proposal as a Win-win situation for all parties involved.




Regards

**Gary Mathers**  
**Director**



Graphic Laminations and Coatings LTD



Tel :   
Fax :   
Mobile 

This email has been filtered by SMX. For more information visit [smxemail.com](http://smxemail.com)

## Written Comment No: 0375

Subject	<b>Salmon farm submissions</b>
From	<a href="#">tjgreenhough</a>
To	aquaculture.submissions@mpi.govt.nz
Sent	Monday, 27 March 2017 6:50 PM
Attachments	<<IMG_0653.JPG>> <<Untitled attachment 00014.txt>> <<IMG_0654.JPG>> <<Untitled attachment 00017.txt>> <<IMG_0655.JPG>> <<Untitled attachment 00020.txt>>

Sorry we had trouble today with the spark internet change over.



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](mailto:aquaculture.submissions@mpi.govt.nz)

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	JANIE GREENHONGIT	
Address	TIMOTHY JOHN GREENHONGIT and TIMOTHY UPPER MONTELEONE 7175	
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 checked="" type="checkbox"/>	I would like to speak to my written submission at a public hearing in _____	
<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).



(2)

***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.



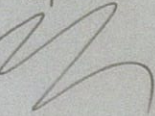
(3)

Other Comments:

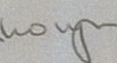
IT IS REDICULOUS TO RIDE ROUGH SHOD OVER THE COUNCILS  
PLAN THAT IT AND THE COMMUNITY HAVE PUT IN PLACE TO  
ENHANCE AND PROTECT THE SOUNDS BOTH VISUALLY AND TO PROTECT  
THE WATER QUALITY AND THE HEALTH OF THE SEA BED

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

T.J. GREENHOUGH

TJG 

JANE GREENHOUGH

Jane Greenough 



**From:** Liz Griffiths [REDACTED]

**Sent:** Thursday, 9 February 2017 11:02 p.m.

**To:** N Smith

**Subject:** Re: relocation options in Marlborough Sounds for King Salmon : Oyster Bay, Tory Channel - at the Centre of the entrance to this bay.

**Importance:** High

Dear Dr Smith,

Please refer to the Ministry for Primary Industries document, January 2017, regarding the potential relocation of the King Salmon farms - plus the enclosed MPI letter, distributed with it, stating that MPI has a concern to 'Grow AND PROTECT' New Zealand.

I have no formal training in fisheries matters and I know we all add to the continual degradation of our world in many ways. However, placing a salmon farm across the very middle of the entrance to Oyster Bay is simply extraordinary and defies common sense.

I believe it will cause dramatic environmental degradation to the water in the bay which will result in a highly damaged, biologically impoverished site in a relatively short period of time.

- An engineering report, prepared by OCEL for King Salmon, clearly shows that the outward flow, down Tory Channel towards the sea, gets significantly pushed in to Oyster Bay. This is largely because a protruding finger of land immediately to the east diverts a significant portion of the flow in to the bay.
- This is a 'closed' bay in that it has no strong in-flow of fresh water to ever clear it of any accumulated debris. The bay is not pristine in that it is already damaged to some extent by pine forestation but that does not mean it is now fine to completely degrade it, as has happened in other sites in NZ and around the world from intensive aqua-farming.
- Most notably, there are already three large salmon farms in close proximity to the entrance to Oyster Bay, two of which in particular, Clay Point and Te Pangu, will already be contributing to some degradation of the water quality in this bay because of the flow along Tory Channel going in to Oyster Bay.
- With these three farms, as well as several mussel farms, all in close proximity to each other, there is already a significant - and sufficient - clustering of aqua-farming in this area.

## Written Comment No: 0007

- As well as the out-flow of water along Tory Channel being diverted, in part, in to the bay, the predominant wind flow is from the north-west, further contributing to the inward drift of water in to the bay. Already a significant amount of rubbish from Tory Channel is swept in to the bay and settles at the high tide mark on the bay directly opposite the entrance. This includes debris from the existing salmon farms.  
  
○
- The bay becomes shallow at the head so any debris being carried in by the water is going to settle within the bay and not be drawn out with the tides sufficiently to ever guarantee clearance of faecal and other matter.  
  
○
- King Salmon claim they monitor water degradation but, not only is this an inexact science, they already have several significantly degraded sites that they are now wanting to vacate and leave to nature to repair over some years. None of those sites is within a bay entirely and it will be less easy for Oyster Bay to ever recover if degraded to such an extent.

It simply stuns me that anyone could propose putting a fourth farm in an area already heavily weighted with aqua-farms, and to then want to site it right in the centre of the entrance to this bay.

The farms at Clay Point, Te Pangu and Ngamahau each require about 26 Thousand Tons of fish feed per year, made largely from chicken abattoir offal and feathers, as well as blood products from beef, pig and sheep slaughter houses. This largely converts into equivalent fish faecal matter. That is estimated that this is already about the equivalent of the waste of some 200,000 people living in a small area of Tory Channel outside a bay that doesn't sufficiently cleanse.

I would greatly value your help, as Environment Minister, for any advice you can give me to help prevent this placement of a fourth salmon farm across the bay entrance. I know the Ministers have the power to make strong interventions in matters of concern, to prevent environmental degradation.

I certainly understand you are very busy but appreciate any input you can give me - yours sincerely - Liz Griffiths

[file:///Users/lizgriffiths/Pictures/Photos%20Library.photoslibrary/Thumbnails/2017/01/29/20170129-001732/flcpkde6SvSI2hjj6zyfmA/thumb\\_1485324351262\\_1024.jpg](file:///Users/lizgriffiths/Pictures/Photos%20Library.photoslibrary/Thumbnails/2017/01/29/20170129-001732/flcpkde6SvSI2hjj6zyfmA/thumb_1485324351262_1024.jpg)









Figure No 2

Three dimensional bathymetry map for the area surrounding marine farm site 8409 and a proposed new site at Tio Point, Oyster Bay, Tory Channel. Depths are in metres relative to mean sea level, as shown on the contour lines.

Liz Griffiths

## Written Comment No: 0007

Subject	<b>Potential relocations of salmon farms in the Marlborough Sounds - please acknowledge receipt of this submission by return email - thank you</b>
From	<a href="#">Liz Griffiths</a>
To	aquaculture submissions
Sent	Wednesday, 22 March 2017 2:50 PM
Attachments	<<1703 Salmon farm submission.docx>>

## Potential Relocation of Salmon Farms in the Marlborough Sounds

To the **Ministry for Primary Industries** - attn : Hon Nathan Guy

and Prof Peter Skelton

Alan Dormer

Ron Crosby

from : Liz Griffiths [REDACTED]

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### **I OPPOSE the relocation of the salmon farms.**

**I would like the opportunity to speak to the panel about my submission - about 10 minutes.**

I appreciate this opportunity to express my concerns. My opposition relates to all the proposed relocations of the salmon farms but I am most familiar with the Tory Channel environment, hence I will be site-specific in my listed comments below.

### **Summary of Points :**

#### **Violation of the areas designated prohibited to salmon farming in Pelorus Sounds**

- (i) the 5 proposed relocations in Pelorus Sound was known before the October 2016 share prospectus was released yet this critical information was with-held and not declared
- (ii) the extraordinary role of Minister for the Environment in altering the terms of the Resource Management Act to enable these relocations.

#### **Concerns regarding the proposed relocation to Tio Point - actually the centre of Oyster Bay**

- (i) detrimental impacts from a relocated salmon farm will be significantly increased for this site
- (ii) environmental, social and economic benefits will be negative for the local owners in the bay

#### **Costs and missed opportunities if relocations do not proceed.**

- (i) reduced benefits to NZ because of high offshore ownership



## Written Comment No: 0007

### **General Comments : King Salmon is bidding to gain access to lucrative new sites.**

(a) **The King Salmon (KS) Application contravenes the Marlborough Sounds Resource Management Plan (MSRMP) which expressly prohibits aquaculture where the 5 Pelorus Sounds relocations are proposed.** The provisions of the MSRMP have been reviewed and considered carefully, being a contract of community, industry stakeholders and council.

(b) **The already damaged state of the marine environment of much of the Sounds, and Pelorus Sound in particular with a probable over-allocation of 3,000 ha of mussel and fin-fish farms, requires the preservation of some of the less effected marine ecosystems.** The likely extinction of many of our New Zealand NZ indigenous species is at a serious all time high.

(c) **KS with-held all reference to the five already-identified relocation sites in Pelorus Sound from their October 2016 share prospectus. From some of their documents it is apparent that these locations had been identified months before the issuing of that share prospectus.** A Cabinet paper also indicates that the future prosperity of KS depends on them acquiring these sites.

Also please refer to : <https://www.mpi.govt.nz/document-vault/16069>

This reference is from the Cawthron Institute to MPI and includes a map clearly showing the Pelorus Sounds locations in August 2016. Although the map is titled 'Confidential' KS has released it to the public arena. By this stage there would have been agreement that the Resource Management Act 1991 (RMA) was to be changed and all this takes time. The CEO of the Environmental Defence Society (EDS) Gary Taylor says "that the MPI is essentially acting as a co-applicant for approvals that will override the Marlborough Council's plans that prohibit aquaculture development in the Outer Sounds".

(d) **In February 2015 KS promoted their need for sites with deeper, faster moving water to meet benthic guidelines** I believe that in March 2015 ministers directed MPI and the Ministry for the Environment (MfE) to investigate the use of ministerial regulation-making-powers to enhance the salmon farming industry. This also includes a dangerous precedent to by-pass the Marlborough District Council who are the assessors and issuers of consents in this jurisdiction.

(e) **The Financial Markets Authority (FMA) has stated that the KS 2016 share prospectus did alert investors to the risk, for KS future earnings, of obtaining future sites.** But investors were entitled to know that the planners had already identified the five sites in Pelorus Sounds, AND that these sitings would require an alteration under section 360A of the terms of the RMA, to gain the use of these prohibited areas in Pelorus Sounds.

The public has expressed outrage with instances by the government to open our national parks and reserves for mining, private tourism structural developments and water abstraction - to the benefit of a few individuals and corporations, both within NZ and overseas.

## Written Comment No: 0007

I believe the deliberate with-holding of this information about the Pelorus sites from the October 2016 prospectus WAS a breach of the Fair Trade Act.

The bullish financial projections in the Share Prospectus reflect the optimism of KS that the relocation sites will be approved.

(f) **KS has used a deliberate strategy to give the public only two months for objectors to come up to speed with lots of technical comments and findings,** and to justify their opposition through a submission. Gary Taylor EDS also sees the process as questionable.

You, the panel, appointed by the government, will make the recommendations to the Minister, who has already taken a position. He can impose his own provisions on the Council to comply, with no rights of further public appeal.

**I : Relocation could reduce the impacts of salmon farming**



But might not. However KS is to be congratulated in accepting to apply Best Management Practice Guidelines, along with the Benthic Guidelines. I understand Te Pangu and Clay Point have begun the process of aiming to reach these basic standards. I also support KS's use of Aqu-S to subdue fish before slaughter. There is much that is positive about the general standards in the running and marketing of KS. I acknowledge the product produced is sought after world wide.

**1. But, given the thousands of tonnes of fish feed required for each of the existing three sites in Tory Channel, there is already a high concentration of production and feed use in Tory Channel.** Per annum, Te Pangu uses 6,000 metric tonnes of fish food, Clay Point 4,000 MT and Ngamahau currently 1,500 with an aim for 4,000 MT. This is already close to 12,000 MT/pa of fish feed and waste that are being deposited in Tory Channel.

**2. Natural diversion of water flow in to Oyster Bay.** The engineering company OCEL, engaged by KS, show in their diagram below that the eastern peninsula of Oyster Bay diverts much of the seaward flow from Tory Channel in to Oyster Bay. So a lot of fish faeces, especially from Te Pangu, will be getting diverted in to the bay already, and will get concentrated along Oyster bay margins because :

- the bay is comparatively shallow and has distinctly tidal beaches
- and there is no constant fresh water inflow to flush out unwanted sediment, and any flow of



fresh water is rarely strong.

Also the wash from the ferries could exacerbate this push of water in to Oyster Bay. The site in the centre of Oyster Bay is closest of all the sites to the ferry lane.

**3. Risk of toxic algal blooms.** The Cawthron Institute have recommended constant water monitoring to ensure safety standards are met. This is essential anyway, without any additional contamination to the water from a 4th farm. High loadings of nutrients, especially nitrogen, from faeces overload and fish feed debris will be beyond the assimilative capacity of the site - as has happened already with other of the KS sites - Forsythe, Ruakaka etc.

Harmful Algae Blooms HAB's are a possible outcome for Oyster Bay. The risk will become a higher certainty with a 4th farm - especially placed where the tides will naturally force much of the debris from that farm directly in to the bay where nutrient build up will occur.

## Written Comment No: 0007

In 2011 there was a major 'red tide' event in Opuia Bay and the organisms at that time were also found in Oyster Bay. At the Nelson 'drop in' day to talk with MPI staff I understood that Opuia and Onapua and other adjoining bays had been omitted as potential relocation sites because of this risk.

**4. Lack of farm sites in Tory Channel.** I am aware a lot of time has gone in to searching for a 4th site in Tory Channel. MPI staff claimed that there simply were 'no other options'. This does not validate using the centre of the entrance to Oyster Bay - especially as their report stated no one particularly lived there (and thought there were only about 3 families - implying 'too few to be of any consequence').

The two staff I talked with had been clearly surprised at the Blenheim 'drop in' to meet some of the Oyster Bay land owners. It seems no one from MPI nor KS had ever bothered to find out who did own properties in the bay - let alone to meet them or to ask what those people's plans were. This is a stunning omission. MPI and KS should have met with the people. It is false to claim that this is about moving the fish farms out of areas with high recreational use and amenity.

To me it seems a deliberate oversight giving the most affected people the least time and chance to stop the deterioration of their place of solitude and peace. It appears that the government has set an agenda with KS - and the result is being forced through.

**5. Why the drive to place a 4th farm in Tory Channel ?** There is no statute saying that a 4th salmon farm MUST be set up in Tory Channel. Why is this being pushed ? by whom ? We all know that the Ruakaka Bay site has been seriously over-stocked for years and that the seabed below and around it will take at least a decade to begin to recover, if the fish are removed, but that is not a reason to expose another site in Tory Channel to a similar risk of degradation.

There is absolutely no justification that I can find that has meant the MPI staff have simply HAD to find a site in Tory Channel. Nor does something need to be settled in urgency - why does all this have to be done in 1 - 2 years ? I got the clear message from MPI staff that the rest of Tory Channel was entirely unsuitable for salmon farming - and that Oyster Bay was a last grab to try to solve the 'problem'. And the centre of the entrance to a bay !!! This will set a precedent that it is acceptable to treat the environment with a form of contempt. It will create a real concern for the future marine environment of the bay, let alone the amenity values for local owners.

**6. Also of the 6 current sites being considered for relocation, only 4 are being used by KS** - so there is not the urgency to replace all 6 when 2 are currently non-functional. The existing consented, and operational 5 sites provide the basis of current good production and returns for KS.

**7. The Aquaculture Reform Bill 2011** allows for a change of species to be farmed - so that a mussel farming consent can be transferred to fin-fish farming. Although debris beneath a mussel farm is also deadly to the environment under it, the shell fish are filter feeders and do not require tonnes and tonnes of artificial feed to survive. The environmental consequences of fish farming simply don't compare. A deal has been proposed with the owners of the mussel farm site - but again the consent



rules wobble as the actual site is too shallow - so who offered the right to KS to move the site to the centre of the entrance ? I can understand the need for deeper water but this in itself becomes a navigational hazard to the people using the bay and adds significantly the visual impact of the proposed farm, let alone the non-consented decision to shift the site. It will set a precedent that has negative potential for many other instances where rules and laws can be flouted or loosely interpreted. Just move anything to suit one's own advantage.

**8. There is simply NOT a single benefit for the local owners should the 4th site eventuate** - just an enormous loss of property value and significant intrusion on their enjoyment of a special place.

## **II : Relocation could deliver environmental, social & economic benefits.**

**1. Better sustainability outcomes simply do NOT apply to the site at the entrance to Oyster Bay.** There WILL be damaging effects on water quality, especially as the tide pushes the water flow in to the bay. The seabed will receive tonnes of fish faeces that have never been there in such quantities. This is about intensive farming - over-stocking / high-level stocking - the result is the same - the seabed cannot cope with the smothering sediment of tonnes of fish faeces.

After heavy rains throughout NZ, get in a plane and look down at the coast-lines - all show huge out pouring of tonnes of greyish soil, nutrients and other sediment, washed in to the sea from all the rivers, spreading far off-shore - debris which eventually settles and stifles much marine life. Sea water remains cloudy, visibility impaired. Releasing thousands of tonnes of artificial feed in to concentrated areas in the Sounds magnifies such environmentally damaging effects - well beyond the capacity of the natural systems to cope.

Nitrogen waste and ammonia from one fish farm can compare with the loading from about 6,000 dairy cows. Te Pangu salmon farm is about 1.2 hectares so this is highly concentrated farming.

KS is not required to pay for, or initiate, any environmental clean up from their sites - but should be.

**2. Potential better social outcomes** - NOT for the land owners of Oyster Bay - they stand to lose value of their properties and loss of amenity values. It is a populated bay. The only visual impact statement I can find was taken from Tory Channel where the viewer felt the farm structure would blend in with the rocky coast line - this is surely not true from within the bay looking out to water.

The two storey accommodation barge, the feeder hopper, the flashing lights, noise, and odour effects from the fish farm will ALL be there. As well as the seal fence, and noise from seabirds attracted to the site, and more worrying the attraction of sharks to the fish area (and also when sharks are attracted to the winter lighting used to inhibit fish maturation) are further problems. No one wants a farm that will attract sharks in to their bay especially as children and dogs play and swim in the water. Nor can they safely play in water that is polluted with tonnes of fish faeces.

## Written Comment No: 0007

Other debris from the existing farms will already float in to the bay - old bits of rope, plastics etc. - because of the prevailing wind direction, as well as from the tidal inflows.

**3. Improved economic outcomes** - maybe this will occur for KS but it will NOT apply to the economic outcome for the land owners in the bay should the 4th farm be established. (And the plight of the land owner near the farm at Ruakaka Bay is testament to that).

KS has consented right to several hectares of the 'commons', each site for 35+ years, without any payment by them to the government, or other administrative body. 5 sites are fully operational already - all now of increasing value on their ledgers - but KS pays no form of rates or other charges to the local Council.

Taxpayers have to pay a significant part of the hundreds of thousands of dollars for the costs involved in this relocation application process, to secure the 6 relocation sites in place of their current lesser quality sites, because of the strong government backing. It is hard to understand the role of MfE in all of this, weakening existing RMA law to place 5 of the proposed sites in prohibited areas.

### III : Relocating farms requires amending the MSRMP.

The government has clearly stated its commitment to the further development of salmon farming in New Zealand and supports this King Salmon Relocation Application to maximise its growth.

The Ministry for Primary Industries MPI is tasked with implementing this growth. Their slogan "Growing and Protecting New Zealand" is therefore unusual in that the focus for MPI is for the owners of the various primary industries in NZ, whereas the word Protecting is often associated with protecting the environment.

MPI and MfE are considering implementing new regulations under section 360A of the RMA to permit relocation of salmon farms to areas where aquaculture is presently prohibited (Coastal Marine Zone 1 CMZ1). This is clearly about 'Growing and Protecting' KS above the stated purpose of the MSRMP, and the wishes of many citizens. This is a serious concern.



## Written Comment No: 0007

As I have stated above this has parallels with instances by this government to open our national parks for mining, private tourism structural developments and water abstraction - all to the benefit of a few individuals and corporations, both within NZ and overseas. Who is the government really working for ?

### **IV : There will be costs and missed opportunities if relocation does not proceed.**

For whom ? The government quite correctly states that it must gain foreign exchange earnings keep providing for the welfare of NZ citizens and other expenditures. NZ has a long history of depending on foreign investments to realise potential from its primary industries.

We are over-selling our country to the highest bidder. Many NZ primary industries have a significant level of foreign ownership. Most of our closest trading partners forbid foreign ownership of their lands.

For NZ a high percentage of all foreign exchange profits just bounce right back overseas. We are not just 'bleeding our profits back overseas' we are hemorrhaging them.

And an increasing lot of industry in NZ is just large scale extraction. The latest OECD report on the status of primary industries in NZ highlights significant over utilisation and deterioration of water quality for example.

The total 50% foreign ownership of KS weakens the government's claim that MPI needs to develop primary industries like KS for NZ to earn foreign exchange proceeds.



## Written Comment No: 0007

The majority owner, 40% of KS, Mr Tiong of Sarawak, is an internationally controversial character in that his company has received consents from his local government to erase thousands of hectares of prime rain forest to reap the value of the wood and replace the forest with palm oil plantations. The loss of orang-utan habitat has hit world headlines but the local forest Iban dwellers are somehow lost in all this - many now refugees in their own country. Mr Tiong in his life time has become one of the world's most wealthy individuals and owns land and businesses in PNG and Australia, including Earnslaw One in NZ, from extractive industry practises that have seriously damaged local environments.

And why then, when there was a significant fish mortality at the KS Waihinau site, did the MPI minister give KS \$600,000 of NZ tax payers money to find out the reasons for such high death rates - and the result - KS concluded it was their over-stocking and subsequently over-stressing the fish.

The government's other goal in boosting primary industries is for employment. Managerial level in KS is well paid, but many employees in NZ primary industries are casual labourers sometimes with weak contracts and terms that don't protect their needs well. And KS has at times over-stated the numbers of employees it actually hires, yet is not held accountable for this.