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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:0588

Subject	<b>Attached comments from MEC Inc.</b>
From	<a href="#">Tim Newsham</a>
To	aquaculture submissions
Sent	Monday, 27 March 2017 2:44 p.m.
Attachments	<<Marlb Environment Centre comments on relocation March 2017.final.docx>>

Please see attachment and file.

## Potential Relocation of Salmon Farms in the Marlborough Sounds

Comments from: Marlborough Environment Centre (MEC)

Contact name: Tim Newsham

Address: [REDACTED] New Zealand

Telephone: [REDACTED]

Email: [REDACTED]

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

**YES** The Marlborough Environment Centre wishes to be heard

### Summary of MEC feedback

# Written Comment No:0588

1. Desired outcome is Option C: The Minister does not recommend the proposed regulations.
2. MEC urges New Zealand King Salmon (NZKS) to reduce the feed and stocking rates at its low flow sites to meet the Benthic Guidelines.
3. MEC advocates a precautionary approach: do not consider any new farms until New Zealand King Salmon (NZKS) proves it can manage its five existing high flow sites - Waitata, Kopaua, Clay Point, Te Pangu and Ngamahau - within the Benthic Guidelines at maximum feed levels.
4. More evidence is required on the wider environmental impacts of these five farms operating at maximum feed levels, and evidence of the creation of promised jobs before considering any new farms.
5. There is inadequate consideration of alternative methods for salmon farming. Rather than look for new sites in the Marlborough Sounds, put funding and effort into land-based or open ocean aquaculture.
6. Section 360A is undemocratic. It takes decision-making away from the Marlborough District Council and community and gives commercial advantage to one company over others.
7. The proposal's five-fold increase in maximum feed levels, and associated increase in nitrogen pollution, is not acceptable.
8. MEC opposes the spending of \$1 million of taxpayer money on a proposal to bail out a company that is already using and polluting public water space for free.

## Introduction

The Marlborough Environment Centre (MEC) was established in 1989 to promote awareness and protect the environment through education and engagement with resource management decision-making.

MEC took part in the formulation of the Marlborough Sounds Resource Management Plan (MSRMP) that was notified in 1995 and introduced CMZ1 and CMZ2. MEC has submitted on marine farming resource consent applications and strives to protect the ecology, recreational enjoyment and landscape values of the Marlborough Sounds as the aquaculture industry expands. It is in the same spirit that we offer this feedback.

MEC must again raise its voice to oppose a NZ King Salmon (NZKS) proposal for new salmon farms in parts of the Marlborough Sounds prohibited to aquaculture.

Sadly, this time it is the Government in partnership with NZKS that is seeking to exploit the Sounds for the benefit of one company and short-term economic gain.



The purported gains of this relocation proposal will be outweighed by the long-term costs of lost biodiversity, despoiled landscapes and reduced recreational enjoyment. There could also be economic damage to the tourism industry and, if nutrients released by farmed salmon trigger increased toxic algal blooms, the mussel industry.

Marlborough District Council reports show that the marine ecosystems of the Sounds are slowly but surely declining under pressure from forestry, fishing, farming, dredging, trawling, marine farming and ferry wake.<sup>1</sup>

MEC is making a grassroots call for wise and balanced decision-making that considers the long-term impacts of any new salmon farms on marine ecosystems as well as the impact on people living in and visiting the Sounds.

The Board of Inquiry was a gruelling process for those who care about the Sounds, with thousands of volunteer hours going into submissions and presentations. But people made the effort because they felt the need to defend the significant values in the Marlborough Sounds that don't show up on a financial balance sheet.

They included bach owners, yachties, recreational fishers, kai moana gatherers, kayakers, divers and eco-tourism operators. And they talked about the beauty of wide open stretches of water, views through bush to the untouched bays below, king shags roosting and dolphins jumping, special spots for gathering seafood, and underwater ecosystems that need clean water the same way we need oxygen.

These are the values that attract people from throughout New Zealand and around the world to visit and enjoy the Marlborough Sounds. They all recognise that the Marlborough Sounds is a unique and special place, and NOT just somewhere to be mined to meet a Government aquaculture target of \$1 billion a year by 2025.

These special values are also recognised by the Marlborough Sounds Resource Management Plan. It sets out Coastal Marine Zones that determine where aquaculture may and may not take place. The prohibition of marine farms in Coastal Marine Zone 1 is to protect areas of significant landscape, natural character, navigation, recreational and amenity values.

The Council's proposed Marlborough Environment Plan is the time to have discussions and make decisions about how we want the Sounds to look and be used in the future. Do we want more salmon farming in the Sounds? Or do we have enough farms and want to protect what's left for recreation and tourism?

The community lost the opportunity for this conversation when the aquaculture chapter was pulled from the Plan last year under intense pressure from industry and the Ministry for Primary Industries (MPI). This gap in process is now being used by NZKS, aided and abetted by MPI, to try once again for high-flow sites after they failed to get what they wanted from the 2013 Board of Inquiry.

Invoking the RMA's Section 360A powers, where the Minister of Aquaculture can over-ride the local Council's Resource Management Plan, sets a disturbing precedent not only for

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<sup>1</sup> History of benthic change in Queen Charlotte Sound/Totaranui, Marlborough, Prepared for MDC, March 2016. NIWA client report NEL2015-018. Picton Bays Environmental Health Assessment, Cawthron Report no 2805, March 2016.

Marlborough but also the rest of New Zealand. While Section 360A applies only to aquaculture at this stage, there is a risk of such powers being extended to other sectors as the Government turns to autocratic measures to meet economic growth targets.

NZKS has finally admitted that their polluted low-flow farms are not sustainable. But the answer is not to ask for new space and seek a significant increase in the amount of salmon feed (and therefore pollution) going into the Marlborough Sounds. 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 be rewarded with help to increase his herd and discharge into a faster river.

The public does not want more salmon farms degrading the marine ecosystems, landscape values and recreational enjoyment of the Sounds. It is time to look seriously at open sea or land-based alternatives and move salmon farms out of the Sounds.

MEC takes an issues-based approach to further comments on the MPI relocation proposal:

## Issue 1: Undemocratic process

MEC opposes the use of Section 360A on the grounds that it is undemocratic. Sir Geoffrey Palmer, architect of the RMA, puts it in a nutshell: "Either we believe in local democracy or we do not... Governments in New Zealand frequently think they know best, and hardly ever is their confidence justified. Absolute power in the end brings absolute disaster."<sup>2</sup>

- The use of Section 360A of the RMA gives the Minister of Aquaculture the absolute 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.
- MPI is driving the process from a growth perspective, at the expense of the Ministry for the Environment and Department of Conservation.
- Despite MPI claims of impartiality<sup>3</sup>, a number of technical reports procured by MPI are by the same experts employed by NZKS for their Board of Inquiry application.
- The current review and public input into Marlborough resource management plans is the proper forum for decisions about the future of aquaculture in the Marlborough Sounds, rather than industry deals and Ministerial edict.

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<sup>2</sup> <http://www.stuff.co.nz/the-press/opinion/8107084/Democracy-neglected-in-Canterbury>

<sup>3</sup> MPI discussion paper 2017/04 p18



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- This use of Section 360A 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.

## Issue 2: Inequitable use of Government funds

MEC is opposed to the amount of taxpayer money that is being spent by MPI to enable NZKS to access space in areas prohibited to aquaculture. This is in stark contrast to the volunteer effort, with no funding, of not-for-profit groups and members of the community who are defending their Marlborough Sounds Resource Management Plan.

- "MPI assessed a number of sites within the Marlborough Sounds... to find suitable salmon farming space."<sup>4</sup> An official Information Act request<sup>5</sup> shows MPI spent \$507,000 from January 1 2016 - March 1 2017 on the process to find new space for NZKS. This does not include the cost of MPI staff time. It is not acceptable for such a large amount of taxpayer money to be spent for the commercial benefit of just one company and the pursuit of economic growth to the detriment of the environment, landscape and recreational values of the Sounds.
- The Cabinet paper<sup>6</sup> shows the Government is prepared to pay up to \$1million to help NZKS, including legal costs of \$250,000, if the Minister's decision goes to judicial review.
- There is no equivalent Government funding for individuals or not-for-profit groups concerned about the process whose only recourse would be to seek a judicial review. (The Environmental Legal Assistance Fund is only available for Environment Court and Board of Inquiry cases.)

## Issue 3: Consideration of alternatives

The NZKS Supreme Court 2014 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]

- The relocation proposal pays scant regard to alternatives for salmon farming (land-based or offshore). There is no information about what is happening in other countries and no cost-benefit analysis about alternatives.
- The Marlborough Salmon Working Group was told "NZ waters are prone to much greater wave extremes than many other locations where offshore farming has

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<sup>4</sup> MPI discussion paper 2017/04 p23

<sup>5</sup> OIA 17-0098

<sup>6</sup> <https://www.mpi.govt.nz/news-and-resources/consultations/marlborough-salmon-relocation/>

proven viable.”<sup>7</sup> Where is the proof for this statement? Are the conditions in NZ more extreme than the Atlantic Coast off Norway and Scotland?

- Having salmon farms offshore (open ocean) 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.
- NZKS claims offshore farming would be achievable in 10 years but was too expensive and not yet proven. The company needs to consider the money it has saved by occupying public water space for free over the past 30 years and not taking responsibility for the cost of its pollution.
- In Tasmania, Huon Aquaculture has signalled that “the future for the industry is offshore sites, high [water] energy sites, and having the technology and equipment to be able to manage those sites”.<sup>8</sup>
- Promising work is being done by the Cawthron Institute into land-based salmon farming that would enable nitrogen waste to be captured, treated and used as fertilizer
- It is time to look seriously at offshore or land-based salmon farming alternatives that take this industry and its pollution out of the Sounds and helps New Zealand live up to its 100% Pure tourism and export marketing branding.
- Rather than pushing this relocation proposal for areas prohibited to aquaculture, MPI and the industry should be leading the way to expedite offshore or land-based farming as future-proofed alternatives.

### Issue 4: Precautionary approach

Policy 3 of the NZ Coastal Policy Statement calls for a precautionary approach. This was reinforced by the BOI decision [par 179]: “[The precautionary approach] provides for ongoing monitoring of the effects of an activity, in order to promote careful and informed environmental decision-making, on the best information available. It is a precautionary technique that provides a pragmatic way forward, enabling development while securing the ongoing protection of the environment, in complex cases where there are ecological or technological uncertainties as to the effects of the proposal.”

- The three new high flow sites granted by the BOI are only just coming on stream. MEC advocates a precautionary approach: 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 applies especially to Tio Point, which would be the fourth salmon farm in close proximity in Tory Channel.

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<sup>7</sup> MSWG Advice to the Minister of Aquaculture, Page 15

<sup>8</sup> Offshore Marine Mariculture Conference, Barcelona, May 2016 <http://www.worldfishing.net/news101/offshore-mariculture-exhibition/an-ocean-of-opportunity-for-offshore-aquaculture>



- In the meantime reduce the feed and stocking rates at the low flow sites to meet the Benthic Guidelines.
- There also needs to be monitoring done on the effects of nitrogen pollution from full feed release beyond the farm foot-print. What is the effect on the water column in the wider Sounds, or the benthos in slow-to-flush bays?

### Issue 5: Increased nitrogen discharge

"Aquaculture operations can... increase nutrient enrichment of the surrounding seabed, which affects nearby habitats. They can deposit... uneaten food and faeces (from finfish farms), which can smother seabed species and habitats. Marine mammals and seabirds can also be displaced by aquaculture, and some species become entangled in the fish-farm structures. In addition, aquaculture may increase the risk of pests and diseases spreading or becoming established." Ministry for Primary Industries, 2013.<sup>9</sup>

- MEC disputes the accuracy of the Minister of Aquaculture'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."<sup>10</sup>
- 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.<sup>11</sup>
- 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.
- The relocation proposal does not contain any monitoring information on the performance of high flow farms installed after the BOI decision. Are Ngamahau, Waitata and Kopaua meeting benthic guidelines? The most recent report available for Te Pangu and Clay Point, the Tory Channel high flow farms, is May 2015. Neither was complying to the Benthic Guidelines.

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<sup>9</sup> Our Marine Environment 2016, a report by the Ministry for the Environment and Statistics New Zealand

<sup>10</sup> [www.beehive.govt.nz/release/proposal-relocate-marlborough-sounds-salmon-farms](http://www.beehive.govt.nz/release/proposal-relocate-marlborough-sounds-salmon-farms)

<sup>11</sup> 2013 Board of Inquiry decision [379] Nitrogen equivalent calculations

- Until NZKS can show their existing five high-flow farms can meet benthic guidelines at maximum feed levels, for three years as recommended by the BOI [Condition of Consent 44a], no new farms should be considered.
- "The Cawthron Institute and a group of technical experts... noted that models should predict as well as possible at the scale of a whole Sound, but will not be accurate for predicting fine scale effects on embayments."<sup>12</sup>
- There is no data about where the salmon pollution is ending up in the Sounds and the effects of that. Nutrients back-washed into bays may be triggering toxic algal blooms which make water unsafe for harvesting mussels and other kaimoana. Cysts of toxic algae *Alexandrium catenella* were present in sediment on the floor of Opuia Bay for 10 years or longer, before the algae first bloomed after NZKS's Clay Point and Te Pangu Bay farms were located nearby<sup>13</sup>.
- The Discussion Paper presents three outcomes (Table on p8), creating the impression that unless new farms are allowed in high flow sites, non-performing and environmentally damaging low-flow farms must continue to operate. MEC suggests a fourth outcome: Reduce feed and stocking levels so low-flow sites meet the Benthic Guidelines.

### Issue 6: King Shag

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.

- Policy 11 of the NZ Coastal Policy Statement calls for protection of indigenous species in the coastal environment.
- 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.
- Increased phytoplankton and reduction in water clarity [caused by extra nutrients from the salmon farms] are potentially significant in the feeding habitat of King Shag.<sup>14</sup>
- The threat to King Shag was a factor in the BOI restricting the number of new farms in the Waitata Reach to two.<sup>15</sup> Yet the relocation proposal is seeking another five farms in the King Shag foraging area, which would bring the total to seven farms.

### Issue 7: Landscape and Cumulative Effects

<sup>12</sup> Potential relocation of salmon farms in the Marlborough Sounds. MPI Discussion Paper 2017/04, p 53

<sup>13</sup> Marlborough Express April 22 2013 [www.stuff.co.nz/marlborough-express/news/8580137/Algae-and-fish-farm-link-prospects-on-global-science-agenda](http://www.stuff.co.nz/marlborough-express/news/8580137/Algae-and-fish-farm-link-prospects-on-global-science-agenda)

<sup>14</sup> 2013 Board of Inquiry decision [431]

<sup>15</sup> 2013 Board of Inquiry decision [1252]



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This proposal will degrade the Outstanding Natural Landscapes and High Natural Character values of the Waitata Reach.<sup>16</sup>

- 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.<sup>17</sup>
- 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, an area with outstanding landscape and high natural character values.

## Issue 8: Lack of consultation

There has been no genuine consultation involving exchange of information between affected and interested parties, applicants and decision-makers, as would be required if a local authority was amending a Plan (RMA section 82)

- There have been no public meetings where questions can be answered and issues openly discussed.
- Drop-in sessions were a presentation of MPI information, not an exchange.
- Discussion papers, pamphlets and drop-in sessions promote the MPI-NZKS perspective, meaning wider research is required.
- The time-frame was too short for the extra research required, given that many interested parties are volunteers with limited spare time. No monitoring reports were available for the three new high flow sites.
- Some reports quoted in the discussion paper<sup>18</sup> can be downloaded only by paying a fee.
- There are no questions about the 360A process, such as "What are your views on the use of Ministerial powers to over-ride the Marlborough Sounds Plan?"
- Providing set consultation questions is restrictive and directive, and not in the spirit of genuine consultation outlined in the RMA.

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<sup>16</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.

<sup>17</sup> 2013 Board of Inquiry decision [1252]

<sup>18</sup> Eg. "Spatial and temporal dynamics in macrobenthos during recovery from salmon farm induced organic enrichment: When is recovery complete?" costs \$39.99

<http://www.sciencedirect.com/science/article/pii/S0025326X13007418>

### **The Marlborough Environment Centre agrees that:**

- Farms that do not meet the Benthic Guidelines should close down or have feed and fish numbers reduced to allow them to meet the Benthic Guidelines. DO NOT agree that in return NZKS receive equivalent space in CMZ1, which is prohibited to aquaculture.
- There should be no overall increase in the total surface structure area of salmon farms in the Marlborough Sounds.
- It would be positive if farm productivity could be increased while complying with the Benthic Guidelines.
- Lower flow sites should cease operations because they are causing pollution, suffering to fish and are not economic. However, new sites should not be forced through under Section 360A as compensation for loss of production.
- If the Minister decrees that a relocation proposal goes ahead, NZKS must apply for resource consents and must satisfy the Undue Adverse Effect test. However, we disagree with consulting only directly affected parties.
- We agree that NZKS should be required to provide advanced real-time monitoring buoys to ensure cumulative water quality effects are appropriately monitored and managed.

### **Relief sought:**

If any part of this relocation proposal is approved by the Minister, the Marlborough Environment Centre seeks the following:

- In recognition of its free occupation and pollution of public water space for the past 30 years, NZKS to pay all MDC costs of modelling, monitoring and compliance associated with its marine farms and contribute to research into wider Sounds effects.
- NZKS to lodge an Environmental bond of \$2 million with MDC. If annual monitoring shows benthic guidelines are not being met by any farm, \$200,000 from the environmental bond goes to environmental groups working to restore and protect the Sounds - recipients to be determined by the MDC.
- NZKS to lodge a Jobs Bond of \$2 million with MDC to hold NZKS to their claims of jobs created. The number of people employed by NZKS to be audited each year. If the jobs are not created as claimed in this proposal, \$200,000 from the Jobs Bond goes towards environmental groups working to restore and protect the Sounds - recipients to be determined by the MDC.
- Easy access to monitoring reports on the NZKS and MDC website

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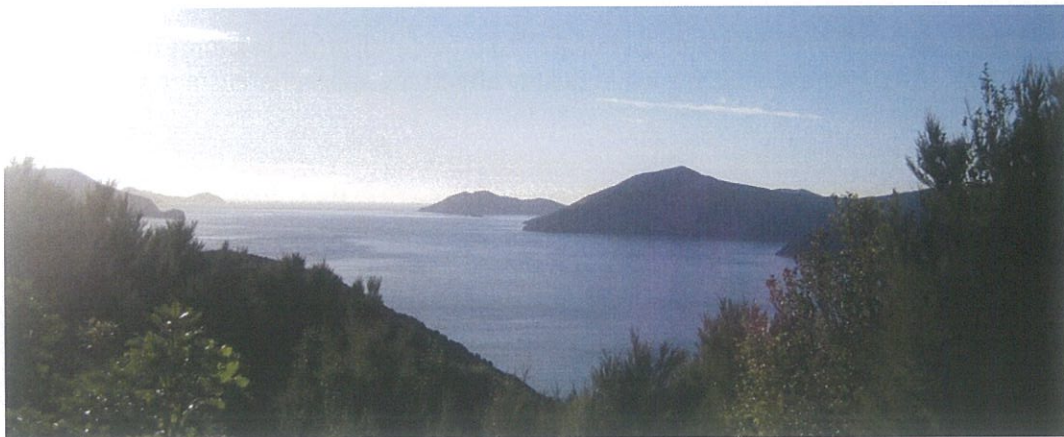
### Conclusion

The Marlborough Environment Centre advocates a precautionary approach: do not consider any new farms until New Zealand King Salmon (NZKS) proves it can manage its five existing high flow sites - Waitata, Kopaua, Clay Point, Te Pangu and Ngamahau - within the Benthic Guidelines at maximum feed levels.

MEC urges New Zealand King Salmon (NZKS) to reduce the feed and stocking rates at its low flow sites to meet the Benthic Guidelines.

Rather than promoting this relocation proposal for areas in the Sounds prohibited to aquaculture, MPI and the industry should invest in researching alternatives to expedite offshore and/or land-based farming as future-proofed alternatives.

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



Waitata Reach, looking north, 2012



## Written Comments No: 0280

Subject	Submission in support of King Salmon relocating farms in the Marlborough Sounds
From	[REDACTED]
To	aquaculture submissions
Cc	Bernie Rowe; edwin pitts; Ivan Sutherland
Sent	Tuesday, 21 March 2017 3:05 p.m.
Attachments	<<Salmon Farm Relocation Proposal submission by MRC March 2017.pdf>>

Please refer to the attached Marlborough Research Centre Trust submission supporting King Salmons application.

please confirm receipt

**Gerald Hope**  
Chief Executive



Blenheim  
New Zealand

Phone: [REDACTED]

Cellph: [REDACTED]

Email: [REDACTED]

Website: [www.mrc.org.nz](http://www.mrc.org.nz)

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MARLBOROUGH  
RESEARCH  
CENTRE

Te Rito Hiranga o Wairau



Blenheim

**Contact:** Gerald Hope  
Chief Executive



## Re: King Salmon Farm Relocation

Ministry for Primary Industries  
Private Bag 14  
Port Nelson

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

### To: The Salmon Relocation Advisory Panel

1. The Marlborough Research Centre (MRC) is an Independent Charitable Trust established in 1984 to ensure the Marlborough Region makes the best use of its natural resources by assisting innovative research and technical development in agriculture, pastoral, horticultural, aquaculture and viticulture production. MRC have a particular focus on achieving economic growth through innovation, research and business collaboration.
2. MRC support the salmon farm relocation proposed by MPI as it provides improved environmental, social and economic outcomes for the region. –The proposal provides employment growth for the Region both through expansion of NZ King Salmon facilities as well as contracted services supporting the company.

### Historical Background to Best Management Practice Guidelines for Salmon Farming in Marlborough Sounds

3. It is important to recognise activity in the Marlborough Sounds has been a source of vigorous debate over a number of years. Each significant change such as forestry and mussel farming have been a source of vigorous debate. There has generally been strong support from the permanent settlers for aquaculture in the Sounds due mainly to employment created and the support provided to the local communities through the retention of school rolls and the establishment of more permanent houses in the Sounds. Salmon farming has been viewed in a similar light. The emerging environmental issues with low flow sites has been a source of contention which the community would like resolved in a way which retains and grows the benefits provided to the Sounds communities.

4. In 2013, following the EPA process, Marlborough District Council with the agreement of New Zealand King Salmon in 2013 committed to a process to ensure Marlborough develops world-leading salmon farming practices which are environmentally and economically sustainable while making an important social and cultural contribution.
5. This process commenced with a week of intensive meetings and workshops bringing together key figures from the industry, regulatory, science providers and Sounds communities to discuss how stakeholders might improve management and understanding of salmon farming in the Marlborough Sounds.
6. Assisting with facilitating the process and providing external independent experience and input were aquaculture experts from Scotland (Professor Kenneth Black) and Australia (Dr Catriona Macleod).

### Key Statements Drawn from the Best Practice Guidelines Consultation material

7. In MRC's opinion there were a few key statements which are pertinent to the proposal to relocate existing salmon farms.
  - a. "The steering group are unanimous that salmon farming is a legitimate activity to be carried out in the Marlborough Sounds and that it is important to both the regional and national economies.
  - b. It is recognised that the salmon industry in Marlborough has evolved over the last 25 years. Scientific understanding and industry practices have advanced significantly during this period.
  - c. It is acknowledged that if we had the ability to start with a blank canvass that the existing coastal occupations for salmon farming would likely be quite different. Spatial allocation would be more focused around sites which have higher water flows, would be in areas where the impact on natural landscape was minor and where there was general community acceptance (social licence to operate). The spatial area allocated would likely be larger to provide for farm rotation to assist management of the environment and fish health.
  - d. Choosing the right site for salmon farming underpins the viability of future farming operations. Selecting sites with optimal farming conditions will reduce the potential for negative environmental interactions.
  - e. There is a need for the community, Council and Central Government to work with and assist New Zealand King Salmon to facilitate change and ensure improved environmental and community outcomes are achieved."
8. While scientific and industry knowledge and practices have evolved the ability to implement beneficial change has been constrained by resources and processes which have created compromised outcomes to date.



# Written Comments No: 0280

## Summary

9. Coming from the premise that salmon farming is a legitimate activity in the Marlborough Sounds MRC support the proposal to relocate all low flow sites to high flow sites.
10. The proposal will achieve significant improvements in environmental outcomes as well as improved social and economic benefits. The proposal will provide the best Regional outcomes possible and for this reason MRC are fully supportive.
11. MRC believe that the intent of the Minister to exercise his Ministerial powers in a responsible manner is in accordance with the broader views of the community for the parties to work together to facilitate change to ensure improved environmental and community outcomes are achieved.
12. It is hoped that all submitters give consideration to what is the best outcome for the community as a whole. Clearly not all parties will be in agreement with the proposal and a high level of respect and understanding is required towards the Panel and their role in this process.
13. The Panel clearly need to consider all the technical information and the submissions received and provide advice to the Minister that the outcomes sought will be achieved from the proposal presented.
14. MRC do not believe the existing position the community finds itself in is a viable alternative and looks to the panel to provide to the Minister the best possible recommendations for change.

Bernie Rowe



Chairman  
Marlborough Research Centre Trust  
16 March 2017

## Written Comments No: 0335

Subject	<b>Submission on the salmon farm relocation proposal - MSQP</b>
From	<a href="#">Colin Johnston</a>
To	aquaculture submissions
Sent	Monday, 27 March 2017 1:37 PM
Attachments	<<salmon farm relocation submission MSQP.pdf>>

To Whom It May Concern

Please find attached a submission on behalf of the Marlborough Shellfish Quality Programme.

We look forward to receiving further information on the consideration process in due course as a submitter.

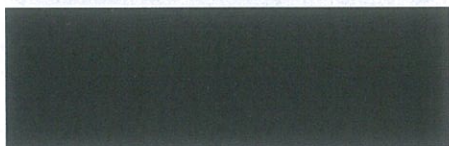
Best wishes

Colin

Colin Johnston

Executive Officer, Marlborough Shellfish Quality Programme (MSQP)

c/- Brightwater Consulting Ltd.



## Marlborough Shellfish Quality Programme



27 March 2017

### The Potential Relocation of Salmon Farms in the Marlborough Sounds

Thank you for the opportunity to comment on the MPI consultation on the potential relocation of salmon farms in the Marlborough Sounds.

The Marlborough Shellfish Quality Programme is an incorporated society responsible for the delivery of water quality and food safety monitoring in bivalve shellfish harvesting areas in the Marlborough Sounds. This delivery programme, unlike in many overseas jurisdictions, is funded entirely by the aquaculture industry at considerable cost each year: The programme carries out on-water sampling using two vessels and two sampling officers 4 days a week, 52 weeks a year. The programme meets Ministry for Primary Industries requirements and ensures that bivalve shellfish harvested from the Marlborough Sounds are safe to eat raw. New Zealand remains one of the few countries in the World where bivalve shellfish can be consumed raw, straight from accredited growing areas. MSQP seeks, on behalf of its financial members, to ensure that this advantageous position remains.

MSQP therefore wishes it to be noted that:

- MSQP supports the robust and comprehensive analysis and consultation being carried out as part of the RMA s360 process;
- MSQP is not opposed to the farm relocations;
- MSQP does seek to limit any sequential downstream effects on the licences and consents of our financial members. This would include any adverse cumulative effects which would be the responsibility of the NZ King Salmon Company Limited to mitigate;
- MSQP therefore would like these matters recognized and provided for in the relocation decision.

MSQP requests to be heard in support of this submission.

Yours sincerely,

Dr Colin Johnston  
Executive Officer  
Marlborough Shellfish Quality Programme Incorporated

## Written Comment No: 0397

Subject	<b>Salmon Farm Relocation</b>
From	<a href="#">Sam Oliver</a>
To	aquaculture submissions
Sent	Friday, 24 March 2017 3:26 PM

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

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

To: The Salmon Relocation Advisory Panel

**Sam Oliver, New Zealand King Salmon, Sales and Operations Planning Manager**

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

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

Environmentally adopting the Best Management Practice guidelines that were agreed by the Council and community is the future of aquaculture globally. I believe that the aquaculture industry is the most environmentally friendly way to sustainably produce food/protein.

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.

Kind Regards

Sam Oliver

--

*Sam Oliver, Sales and Operations Planning Manager*



| W: [www.kingsalmon.co.nz](http://www.kingsalmon.co.nz) | A: [REDACTED] Tahunanui 7011





## Written Comment No: 0397



Internet e-Mail Disclaimer: All information in this message and attachments is confidential and may be legally privileged. Only intended recipients are authorised to use it. Views and opinions expressed in this e-mail are those of the sender and do not necessarily reflect the views of the company. E-mail transmissions are not guaranteed to be secure or error free and The New Zealand King Salmon Co Ltd accepts no liability for such errors or omissions.

## Written Comments No: 0233

Subject	<b>Proposed Marlborough Salmon Farm Relocations</b>
From	[REDACTED]
To	aquaculture submissions
Sent	Thursday, 16 March 2017 5:00 p.m.

Good afternoon,

I fully support for the proposed Marlborough salmon farm relocation project led by the Ministry for Primary Industries (MPI).

I believe that implementation of the proposal will lead to significant environmental, social and economic benefits for all stakeholders, including the Top of the South community.

The proposed better farm locations, with faster flowing water currents, will allow farming to be done in a more environmentally sustainable way, including implementing Best Practice Guidelines developed in conjunction with the community and Marlborough District Council. These guidelines have already been implemented on other higher water flow sites. The proposed new sites will improve fish health and welfare, and thus deliver higher quality fish to meet growing global demand and thus help support the Marlborough economy.

Relocating some existing farms will improve social outcomes through moving to areas with less competing use, including moving away from existing holiday houses and areas targeted as recreational use.

I consider the proposed farm relocations in the best interests of all parties.

Regards,

Paul Martin

[REDACTED]

[REDACTED]

Auckland

[REDACTED]



## Written Comment No: 0382

Subject	<b>King Salmon final1</b>
From	<a href="#">Peter Martin</a>
To	aquaculture.submissions@mpi.govt.nz
Cc	Nikki Elliot
Sent	Monday, 27 March 2017 5:38 PM
Attachments	<<King Salmon final1.docx>>

To whom it may concern

There were a couple of errors at the end of the document which inadvertently included in our final document.

Could you please replace that document from us with the attached copy

Thank you

Regards

Pete

### 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](mailto: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: 0382

## Public hearings

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

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

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

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

## Questions

### Question 1:

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


- 1.1 No we do not think up to six salmon farms should be relocated to high flow as proposed. Whilst theoretically better than concentrating toxic farm waste in a more discrete area this proposal is simply an attempt to spread the problem of the waste.
- 1.2 We have outlined reasons below. Long gone are the days we can simply pretend that the sea has a never-ending capacity to soak up our "rubbish" and that the currents will simply carry them away. We believe is an archaic approach.
- 1.3 Would it be ok if a dairy farm or factory poisoned a river and were pulled up because of water quality monitoring concerns, but suggested "don't worry, we'll just pop the waste in to 4 other rivers, so it's ok"? No! Especially if they then said: "hey, our river is fine so let's add 500 more cows!". This is what this proposal is suggesting.
- 1.3 decision has been rushed with no appropriate reviews (SEE MSWG Exe summary P5 point 8)
- 1.4 High flow areas will encourage NZKS to increase production with up to 24600 tonnes on site (SEE MSWG Executive Summary page 15 and 25)



## Written Comment No: 0382

1.5 What implication does rezoning this area have on future marine farms? Are more salmon or mussel farms going into the area?

1.6 tides mean that half of the time the waste has potential to end up in the shallower areas further up the sound. As does any other rubbish.

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**Question 2:**

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

2.1 We think site 125 Waitata middle is not suitable as in the middle of the reach and as stated by NIWA have stated it is better to have the farms in the outer sound where the nitrogen flow is predominately to Cook Strait

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**Question 3:**

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

3.1 We believe none of them. As predicted, waste effects are such that so-called adaptive management farming is not possible without unacceptable environmental effects. NZKS have mismanaged these sites and are now facing reduced production to bring the farms back to meeting their obligations under their consent.

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**Question 4:**

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

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### 4.1 We have concerns of a number of individual sites including the following

Site 125 in the middle of the reach is unacceptable from environmental, safety and amenity perspectives. We have seen large family groups of dolphins racing down the reach, presumably on a hunting mission. We would hate to see this magnificent natural activity disrupted. Plus there have been young dolphins caught in cage nets already. The only possible mitigation at this site is not to use it.

Post office point significant historical site not appropriate and ugly

- 4.2 Richmond bay South site has significant recreational use for scallops (SEE MSWG Exe summary P29). In 2016/2017 gathering scallops in the greater Marlborough sounds was banned due to mismanagement of the beds. Siting a salmon farm directly above this scarce resource will add unnecessary stress to a precious supply.

#### Question 5:

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

### 5.1 Environmental and amenity costs have been identified but we believe unfairly minimised in reports

#### Question 6:

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

### 6.1 More strength added to environmental effects monitoring

#### 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?



7.1 So long as the requirements are strict enough, particularly environmental monitoring.

**Question 8:**

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

8.1 Yes

**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?

9.1 NO, there are extensive salmon and mussel farms throughout the already stressed Pelorus Sound.

**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?

10.1 NO, there are extensive salmon and mussel farms throughout the already stressed Pelorus Sound.

**Question 11:**

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




11.1 In general so long as monitoring is strict enough and covers enough areas the waste reaches

**Question 12:**

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


**Question 13:**

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


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13.1 As we understand the situation is the low flow sites are failing their consents with many

43. The following table and graph provides a summary of farm compliance (low-flow sites) against ES5 for the 2012-2015 period.

Maximum Enrichment Stage (95%CI) by consented site for 2012-2015				
	2012	2013	2014	2015
Otanerau	6.15 (0.05)	5.60 (0.3)	5.70 (0)	5.90 (0.4)
Ruakaka	5.37 (0.16)	5.00	5.60 (0.1)	5.30 (0.3)
Waihinau	4.31	5.10 (0.1)	5.40 (0.2)	4.60
Forsyth	4.80	5.60 (0.2)	5.60 (0)	6.00 (0.3)
Crail Bay (x2)	na	na	na	na
Maximum average score refers to the maximum ES average station score across each sampling site beneath a farm. This score is used to assess compliance with ES5.				

Maximum Enrichment Stage (95%CI) assessed per Benthic Guidelines. Actions required:				
	2012	2013	2014	2015
Otanerau	Destocking	Minor	Destocking	Major
Ruakaka	Minor		Major	Minor
Waihinau		Alert	Minor	
Forsyth		Major	Major	Destocking
Crail Bay (x2)				
Alert – Written Management Response Plan Minor – 24 months to compliance, improvement within 12 months required Major – More significant response to bring to compliance required. 12 months improvement Destocking – 4 months or end production cycle.				

sites going above ES5. NZKS has a history of blowing through their consents. None of this has been covered and no questions have been raised about the poor history NZKS. It is clear the level of pollution is extremely high and by locating the farms in one small area with high water flow the pollution appears to “disappear” but effectively the pollution is harder to trace but accumulates over a wider area. Nitrogen and ammonia recordings are limited and only 4 sites in the inner Pelorus Sound

### 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?



15.1 We question how reports seem to appear to favour marine farming and attempt to minimise environmental effects and costs - most of which fall on us, the people of NZ. If this continues we feel the minister can't be trusted to represent us and our interests and rights. Nor those of future generations to enjoy the incredible and unique natural sounds area. We don't believe the minister has given enough weight to our obligations as a signatory to... We believe this contradicts international agreements that New Zealand has signed including (The Convention on Biodiversity <http://www.cbd.int/intro/>) and The United Nations Decade on Biodiversity <http://www.decadeonbiodiversity.net/>

**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?

16.1 As noted, post office point signif historic point and the middle of waitata reach is unacceptable from wildlife and natural beauty perspective

**Question 17:**

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

17.1 Noise from boats and water craft servicing the salmon farms have not be accounted for.

**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?



19.1 A large number of Salmon pens are concentrated in one area. This doesn't appear to be taken into account. And higher flow will spread contaminants around various sites in the sound and worsen water quality all around the sites, particularly on an incoming tide

**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?

20.1 Only with waste capture

**Question 21:**

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

21.1 As with the boi process the concern remains that this factory farming practice highly stresses the fish and effects their immune systems. The risk of toxic algal blooms is still unacceptable

**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?



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23.1 We believe the effects on the sea bed will be cumulative and are not fully understood due to the rushed process ( See MSWG executive summary P5 Point 8) and lack of peer review.

23.2 No mention of concentrating a number of Salmon pens in a very small area and its cumulative effects on the seabed

23.3 No mention of the spread of pests and disease from one pen to another when they are in close proximity to each other. This is mentioned in the FAQ section where bacteria was implicated as one of the reasons for the high mortality rate in 2015. Our concern is that it could spread easily from one farm to another in such a concentrated area.

23.4 The 2012 EPA ruling covered the damage and we will expand on this at our presentation.

23.5 No discussion on the Salmon feed , its make up or density as per EPA inquiry. (More information available in our presentation). Where is the salmon feed and the resulting faeces will have a differing effect on the environment. There appears to be no constraint on the feeding out on antibiotics or other treatments such as hormones or restrictions on food. No mention of environmentally harvested food such as anchovies.

23.6 There was a seaweed found in the Marlborough Sounds that is being investigated to develop a cancer treatment. There are potentially many other sea organisms we risk contaminating or eliminating. and there was mention of something along the lines in the BOI results. We don't know what we don't know about creatures in the area.

### Question 24:

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

### Question 25:

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



## Written Comment No: 0382

25.1 The seabed has already been damaged in many sites by trawling and there are significant sediment effects from deforestation and erosion, farming, housing development, marina dredging and so on. We should be trying to improve sediment issues not add to them. Large seaweed "towers" were present and could grow over time.

**Question 26:**

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

26.1 Noise, feed, activity and lighting effects will be disruptive to any natural fish in the area

**Question 27:**

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

27.1 King shag, Less than a 1000 birds (SEE MSWG Exe summary P39)

New Zealand does have a Biodiversity Strategy, as required by the Convention. New Zealand's Fisheries Act 1996 also sets up a framework for the sustainable use of fisheries resources. One of the environmental Principles requires that all actions under this Act consider the maintenance of biological diversity of the aquatic environment. They have already stated in the FAQ that the board needs to consider the act.

The effects on shags - again reports have minimised potential effects on water quality already potential eroded by other activities. Don't need add more risks

27.2 There is no mention of increased boat traffic and its effect on blue penguins and shags. Any consideration been given to wildlife being stuck in nets?

**Question 28:**

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



### 28.1 King Shags nest at Duffers reef

**Question 29:**

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

29.1 Covered by the MSWG and assessed as low impact. but still highlight that we are particularly concerned about effects on dolphins, orca and other whales (which we have regularly seen) as well as concerns about attracting more sharks as stated in the BOI.

**Question 30:**

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

### 30.1 We regularly see large groups of dolphins in this area.

**Question 31:**

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

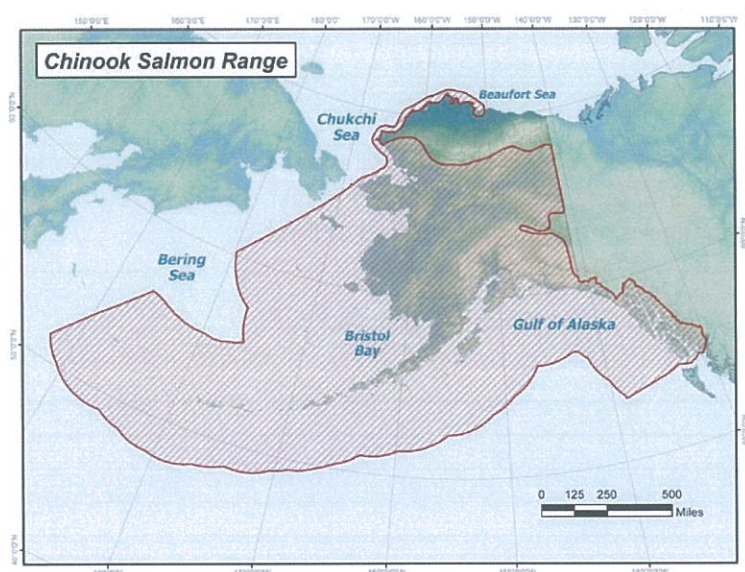
31.1 Yes, our recommendation is use independent auditors, maybe overseas research laboratories. We believe the relationship between NZKS and Cawthorne scientists is a little too cosy and we question their independence as the BOI did. The GOVT wants to grow the aquaculture industry and these reports commissioned by the GOVT seem to minimise the environmental effects.

**Question 32:**

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



32.1 We believe the salmon's welfare is not a priority  
Sea temperature between 11°C to 18°C (SEE MSWG Exe summary P30) . This temperature range contradicts Chinook natural environmental temperature range with a maximum of 13°C <http://www.adfg.alaska.gov/index.cfm?adfg=chinook.main>



32.2 Questions were raised about the salmon welfare during the BOI. We will refer to these points.

The BOI raised concerns about highly stressed salmon in poor condition

**Question 33:**

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

This has been covered in the MSWG

**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?

34.1 from time to time we pass salmon farms and we good view of their operation. From the increased height of a cruise ship this vision of our salmon farms would not promote NZ as a clean green country especially as some of our guests are aware of the destruction some salmon farms have had in their home country.

**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?

35.1 In general we found the TARA report to be limited and light weight. We believe we have found flaws in some of their finds.

35.2 No mention of reduced cod numbers in the Queen Charlotte Sound. This reduction would mean more fishers will visit the Pelorus Sound.

35.3 No mention of further industrialisation of the Pelorus Sound needs more emphasis and tourist loading on the Queen Charlotte Sound when the tourist load should be shared by both Sounds.

35.4 No mention of the auxiliary activity and its effect on the "Wildness" experience visitors expect. Such activity includes boat noise and additional boat traffic, maintenance and repairs on the salmon pens.

**Question 36:**

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



## Written Comment No: 0382

**Question 37:**

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

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**Question 38:**

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

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**Question 39:**

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

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39.1 Absolutely - huge stressor And isn't it possible shark attractant as mentioned in submissions to the BOI

**Question 40:**

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

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## Written Comment No: 0382

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

We plan to make a verbal submission. Could you please allow us to make our presentation on a Friday or a Monday so we can travel to the venue over the weekend. Thanks.



Written Comment No: 0382

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