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

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Subject	Submission
From	<a href="#">Jacqui McLeod</a>
To	aquaculture submissions
Sent	Monday, 27 March 2017 2:18 PM
Attachments	<<SubmissionEmailTemplate (1).docx>>

Regards,

**Jacqui McLeod** | HR Assistant | Port Nelson Ltd | DDI [REDACTED] | Mobile [REDACTED] | [www.portnelson.co.nz](http://www.portnelson.co.nz)

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# Written Comments No: 0329

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

**From: Jacqueline Lauren McLeod, Port Nelson Ltd, HR Assistant**

As an ex-employee (of 8 ½ years) of New Zealand King Salmon, I fully support the potential salmon relocation process being proposed by MPI because I believe the salmon farm relocation will provide for better environmental, social and economic outcomes.

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

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

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

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

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

Jacqui McLeod

Tel [REDACTED]

Relocation of Salmon Farms in Marlborough Sounds

I have worked at NZKS for 15 years and I support the move of the farms from low flow sites into faster flowing water. I am a smokehouse operator and I notice the difference in the quality of the salmon coming from low water flow farms. Moving these farms will give us consistent quality of salmon. The fish will be healthier, we will be able to farm more salmon and this will mean more jobs for Nelson and Marlborough. It will also be better for the water quality in the sounds.

Ian McMahon



*Ian McMahon*

22/2/17

## Written Comments No: 0353

Subject	Salmon Farm Relocation submission
From	<a href="#">Stuart Trustrum</a>
To	aquaculture submissions
Sent	Monday, 27 March 2017 12:42 p.m.
Attachments	<<Salmon Farm Relocation submission.docx>>

Please find attached my submission for the Salmon Farm Relocation.

Kind regards

Stuart Trustrum



Office Phone: [REDACTED]

Cellphone: [REDACTED]

Fax: [REDACTED]

Email: [REDACTED]

Website: [www.medfoodmarl.co.nz](http://www.medfoodmarl.co.nz)

*Have you tried our new website yet?*

*Please go on and register*

*We have new products coming on board, especially artisan style and please let us have your feedback so we may improve it for the future.*

# Written Comments No: 0353

Salmon Farm Relocation

Ministry for Primary Industries

Private Bag 14

Port Nelson

aquaculture.submissions@mpi.govt.nz

To: The Salmon Relocation Advisory Panel

## Introduction – Stuart Trustrum / Mediterranean Food Warehouse Marlborough

We 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.

We understand that by relocating farms from lower water flow sites to higher water flows sites fish performance will improve and therefore the health of the salmon. It 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.

As a provider to the hospitality industry of International and New Zealand products we are expected by our customers, their customers both local and international to supply local premium quality food products. Regal Salmon is a highly recognised domestically and Ora King is recognised by both domestic and international consumers as the premium Salmon of the World. These products provide our customers with faith in our company and New Zealand King Salmon as a local producer and employer, allowing us all to showcase our region and country to all who visit Marlborough. Our company has trebled in size over the past three years partly due to promoting the Salmon to our market.

We have enjoyed the privilege of supplying and showcasing with our Restaurants, Hotels and Exclusive Lodges these wonderful examples of how New Zealand leads the world with sustainable fishery envied by the world on our door step. What is proposed can only enhance local and international markets driven by our customers having the product available on the menus. As we are growing and have increased our staff by four people over the past three years, these plans not only will increase NZKSA staffing in Marlborough but ours. Currently we are expecting to add another two employee's in the next two months and more before the next busy summer season.

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

Name: Stuart Trustrum

Email:


Date: 27/03/17

Phone

## Written Comment No: 0494

Subject	<b>marlborough salmon farm relocation</b>
From	<u>Peter Meech</u>
To	aquaculture submissions
Sent	Sunday, 26 March 2017 3:33 p.m.

Neither the Minister nor the Ministry should be involved in the workings of a public company. Failing sites should comply with existing requirements, or cease. If new sites have been identified, they should be available to all. Outcome Three should prevail.

not wish to appear. Peter Meech  I do

Subject	<b>The Salmon Relocation Advisory Panel</b>
From	[REDACTED]
To	aquaculture submissions
Sent	Thursday, 9 March 2017 3:04 p.m.

To Whom it may concern,

Philip Melton  
Aus sales manager  
Melbourne Australia.

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

I understand that by relocating farms from lower water flow sites to higher water flow sites fish performance will improve and therefore the health of the Salmon.

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.

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

Kind regards

**Philip Melton**  
**Sales Manager**  
**New Zealand King Salmon**  
Email - [REDACTED]



Customer service & inquiries [REDACTED]



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# Written Comments No: 0238

## 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	Robert and Caroline Menzies.
Address	[REDACTED]
Email	[REDACTED]
Telephone (day)	[REDACTED]

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

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

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

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

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

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

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

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

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

### *The Board of Inquiry drew the limits*

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

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

## Written Comments No: 0238

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

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

### *The best Place for Salmon Farming?*

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

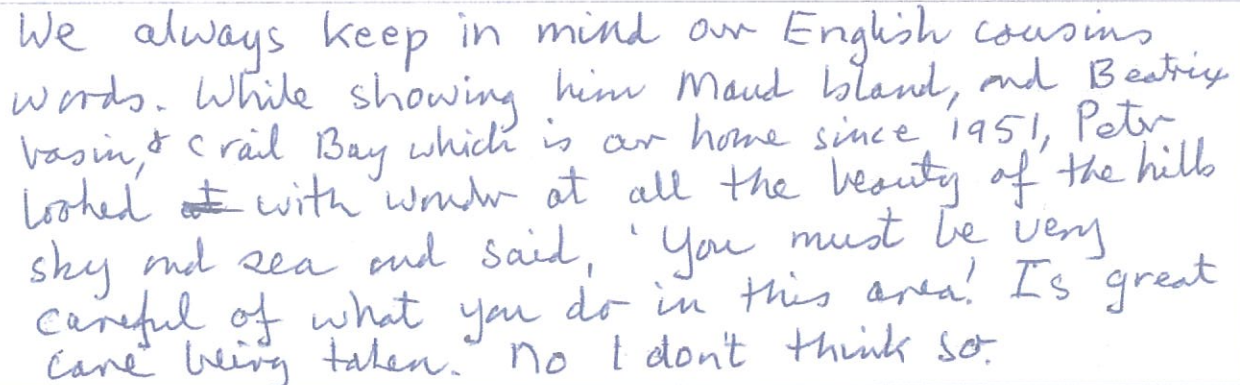
We submit that the science shows that 17 degrees Celsius is the maximum sustainable temperature for salmon farming, above this trigger the fish become stressed and vulnerable to disease. MDC records show that the Waitata Reach of the Pelorus Sound has summer seawater temperatures exceeding 17 degrees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

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

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

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

Other Comments:

A handwritten note in blue ink, enclosed in a thin black rectangular border. The text is written in a cursive, slightly slanted script. It reads: "We always keep in mind our English cousins words. While showing him Maud Island, and Beatrix basin, & Crail Bay which is our home since 1951, Peter looked at with wonder at all the beauty of the hills sky and sea and said, 'You must be very careful of what you do in this area! It's great care being taken. No I don't think so.'"

We always keep in mind our English cousins words. While showing him Maud Island, and Beatrix basin, & Crail Bay which is our home since 1951, Peter looked at with wonder at all the beauty of the hills sky and sea and said, 'You must be very careful of what you do in this area! It's great care being taken. No I don't think so.'

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

## Written Comments No: 0337

Subject	MMMera Submission to support the salmon farm relocation
From	<a href="#">Mylene Mera</a>
To	aquaculture submissions
Sent	Monday, 27 March 2017 1:33 PM
Attachments	<<MPI Submission.docx>>

To the Salmon Relocation Advisory Panel,  
Please find attached my submission in support of the salmon farm relocation.  
Thank you.  
Mylene

**Mylene Mera, Product Development Technologist**



[www.kingsalmon.co.nz](http://www.kingsalmon.co.nz)



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## Written Comments No: 0337

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

I am Mylene Mera and I am a Product Development Technologist at New Zealand King Salmon.

I support the potential relocation of salmon farms being proposed by MPI because I believe that relocating the farms will have positive environmental, social and economic impact to the community as well as to the employees of NZKS.

My submission will not discuss the impact of the relocation on a macro level. However, I would like to share the impact it would have to me and to my family which is in the Philippines. My job at NZKS is allowing me to help three families in the Philippines. Being the eldest child, I took the responsibility of taking care of my parents especially my mother. Coming from a middle class family, saving for retirement is not on our priority list because the immediate need is to provide the basic need to survive (i.e. food and housing). With my job in NZKS, I am able to support my parents and help others. Aside from helping my parents, I am also supporting my youngest brother (by paying for his tuition) to attend a vocational school to obtain a skill in welding that would be useful to find a job. I am also able to help my uncle obtain a tricycle (a mode of transportation in the Philippines) that he is now using to earn a living to support his family (after his stroke) and send my cousin to school. I am able to do all these because I have a job with NZKS. My next project is to save enough so I can buy a house for my parents for their retirement and start a small sustainable hog farming. I am also saving for my retirement through the Kiwisaver but I hope to save more so when I grow old, I will be able to enjoy a comfortable life.

Relocating the farms would also mean that NZKS will be able to hire and help more immigrants like me. NZKS has given us hope for a better future for our family. It allowed us to hope and dream a happy life for our family. For others, that would mean having their dignity and self esteem restored.

As my way of paying it forward to NZKS and to New Zealand, I would volunteer during major events at the top of the South Island to raise money to help the Nelson Marlborough Rescue Helicopter Trust every year since 2013. Together with the other NZKS employees (4-5 people), we would sell bagels and ALL the money we raise were donated to NMRHT. Terry Baxter (the Territory Manager for Top of the SI) even dubbed us as the Bagel Babes and the NMRHT knew about us too! I have become friends with the other Bagel Babes and it broadened my network of friends. I also find these events to be helpful to practice my conversational skills (in English) and strengthen my connection with the community. We also utilize these events to promote new products that we have developed by having free tastings and obtain actual feedback from potential consumers.

## Written Comments No: 0337

I believe that relocating the farm will improve the health of the salmon and thus will produce the highest quality of salmon that New Zealand will be proud of. I remember the first time I tasted salmon. It was after my job interview with Jemma (GM for Marketing) and Grace (NPD Manager) back in May 2013. They were having a tasting and they invited me to join them. The cold smoked salmon I tasted has a delicate flavour, just about right smokiness and saltiness with buttery texture that melted in my mouth. The experience is unforgettable! I was hooked after that. That was the first cold smoked salmon I ever tasted. You see, Salmon is a very expensive product in the Philippines. The only part of salmon that we can afford is the head with fins that we make into fish soup (or Sinigang in Tagalog). And we only have this very seldom as well because even the salmon head is also expensive. As a Product Development Technologist, working with good quality salmon will inspire me to create and develop new products that will give that awesome, premium salmon experience to customers.

Having a stable job also allowed me to undertake professional development. I enrolled at the University of Auckland to get a Masters of Professional Studies in Food Safety. I still have to take one more paper after the one I am currently taking and then I will start work on my "project". For my project, I am thinking of finding the appropriate predictive microbiological model for APC as reference microorganism in fresh Chinook salmon packed in modified atmosphere packaging. It would be more exciting to work with salmon with consistent good quality.

In a nutshell, relocating the farm will create job stability for me and also create opportunities for new employees. I will be able to continue to help my family, share the blessings I receive to others and save something for my retirement. It will also allow me to further develop my expertise and provide the opportunity for me to pay it forward to the community.

I do not wish to be heard by the Advisory Panel.

Thank you.

Sincerely,

Mylene Mera  
Product Development Technologist  
New Zealand King Salmon

Potential relocation of salmon farms in the Marlborough Sounds.

Nina Milne

[REDACTED]

[REDACTED]

As a NZ King Salmon employee I very much support that the farms to be moved to high flow sites which in turn will be great for the environment not to mention great for the growth in the area of employment.

*Nina Milne*  
*15/2/17*



Subject	<b>Marlborough Salmon Relocation Proposal</b>
From	[REDACTED]
To	aquaculture submissions
Sent	Tuesday, 21 February 2017 10:51 a.m.

Dear Whomever It May Concern

I am writing in regards to the Marlborough salmon relocation proposal. I feel very strongly that this is a positive proposition and that the relocation should go ahead.

I am a proud employee of The New Zealand King Salmon Co. Ltd (NZKS). This is a brilliant company to work for; we have varied, dynamic and well paid jobs across the Nelson / Tasman and Marlborough regions, in addition to wider NZ and overseas. We have a fantastic team of passionate employees. Our people are what make us great - our people and our salmon.

I live in Nelson and class the Marlborough Sounds as my backyard. I spend my weekends camping, kayaking, fishing and swimming in the Sounds and I love taking out-of-town visitors there to showcase our beautiful and diverse region. I am originally from Scotland, a country where aquaculture and salmon farming is well established. I have witnessed first-hand how salmon farming can bring communities together and keep rural communities afloat; providing jobs and opportunities where before there were none and thus improving the social, cultural and economic outcomes in those areas.

I struggle with the concept that many people are opposed to salmon farming in the Marlborough Sounds in general. There are so many obvious benefits - economic, social, cultural, environmental.

Aquaculture is crucial for meeting the increasing global demand for protein. Our rivers and oceans are finite. World fisheries are currently 50% over exploited and it is believed natural fisheries will reach full depletion by 2056. Aquaculture is a solution to this problem.

I class myself as a bit of an 'eco warrior', I am conscious about how my being impacts the planet. I recycle and reuse, I make conscious and informed decisions about how I spend my dollar - everything from food to clothing to cleaning products. I make informed decisions once I am confident the product will meet my needs and also meet my ethics and standards. I only buy high welfare protein, free range eggs and environmentally friendly products.

As stated, I am a proud employee of NZKS; I have confidence in our company processes and ethics, our Aquaculture and Environmental Compliance teams. As a company, we have a strong sense of environmental responsibility which resonates with me.

Moving the farms from their current locations to the proposed new sites will result in improved fish welfare and health, in addition to a reduced environmental impact - surely these two things alone are a big positive whether you are pro-salmon farming or not.

For me, the site swap will mean more reassurance of the welfare of our fish, ensuring our salmon are in the best possible environment and receiving the best possible care.

It will also mean a better quality, more consistent fish for our customers. I work closely with our chef customers on our premium foodservice brand Ora King both within NZ and overseas. The demand for Ora King is constantly growing and we just cannot meet that demand with our current circumstances. Our customers love our product, they love that we farm in such a beautiful, remote location; they love visiting us in Marlborough and Nelson / Tasman, meeting the Aquaculture teams and seeing the product at the source.

NZKS customers have confidence in our environmental and sustainability credentials - they are open minded enough to realise that not everything that is 'farmed' is bad. They have done their research and have confidence that Ora King salmon from NZ is a safe and healthy product, high in heart healthy omega 3's and the pinnacle of salmon when it comes to organoleptics - colour, fat content, marbling, texture, taste, aroma. Site relocation will help us meet the increasing demand for Ora King



salmon (and our King salmon in general), supplying countries like North America, where they have more confidence in the NZ food industry practices than their own.

Thanks & Kind Regards

**Lauren Mitchell**, *Brand Manager Foodservice*



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## Written Comment No: 0127

Subject	<b>Salmon Farm</b>
From	Shannen Mitchell
To	aquaculture submissions
Sent	Tuesday, 28 February 2017 10:04 a.m.

Hi there

This is my positive submission to the salmon farm swap. I love Marlborough's King salmon and thoroughly enjoyed eating it during my trip to NZ last year - my sister even served it at her wedding in Nelson.

When I traveled on the Interislander ferry from Picton - Wellington I saw some salmon farms on the journey and I thought to myself "what an amazing place to work - how cool is their office!" I was surprised at how small the farms actually are and how little space they take up. They seem to fit right into the local landscape.

If the proposal means moving the farms to sites that are better suited for the health of the salmon then I think this is a great thing and exceptions SHOULD be made. Why would you keep farms in a place if it has a detrimental affect on the fish? That seems cruel.

I hope my submission is well received.

Shannen Claire Mitchell

Sent from my iPhone

# Written Comments No: 0141

Subject	<b>Salmon farm swap</b>
From	Chantelle Mitchell
To	aquaculture submissions
Sent	Wednesday, 1 March 2017 8:16 a.m.

Dear MPI,

I would like to make a positive submission to the Marlborough salmon farm swap. I think this proposal is a positive one.

It makes sense to move the farms from their current locations if they cannot meet the environmental commitments and best practice / management guidelines that have been set out.

Also, from the looks of it, the new sites will be in more remote locations, therefore this should have a positive impact on the people who have holiday homes in the Marlborough Sounds and also recreational fishermen / boaties who sail through the Sounds.

Thank You,

Chantelle McGeough

## Written Comments No: 0147

Subject	Salmon farm relocation
From	[REDACTED]
To	aquaculture submissions
Sent	Friday, 3 March 2017 6:14 a.m.

Dear MPI

I am writing in relation to the Marlborough salmon relocation proposal which I think should go ahead. This can only be a positive step forward for Marlborough and the NZ salmon farming industry.

My daughter lives and works in the top of the South Island of NZ. She works within the aquaculture industry and I hear first-hand about the goings on and challenges facing the industry.

I believe salmon from Marlborough is as good as the salmon we have here in Scotland. It is a product to be truly proud of.

Scotland is the third largest producer of Atlantic salmon globally and it is one of our biggest exports. Our nation is one that has embraced aquaculture and salmon farming for all the benefits it brings us.

I understand that aquaculture is still in it's infancy in NZ and therefore there is a long journey ahead for the industry, however, the Marlborough farms site swap is a step in the right direction.

As I live in the UK, I will be unable to attend the hearing in Marlborough in person. Unless of course you can cover the cost of my travel expenses in which case I will gladly attend.

Yours Sincerely

Thomas Mitchell

Relocation of Salmon Farms in Marlborough Sounds

I support the farms moving to faster flowing water because the fish will be in healthier condition. Growing in fast flow water it will be cleaner and cooler and the salmon will be a better quality. Less stress for the fish in better quality water means happier fish with fewer diseases. The better the quality of our fish, the more we can sell and the more jobs available in the future.

Paige Mockler

[Redacted]

*P. Mockler 22/2/17*

Potential relocation of salmon farms in the Marlborough Sounds.

Regina Moka

I have worked at NZKS for a total of 16 years and need this job to support my family. I support the moving of the farms to better locations because it will improve the environment in the sounds, better quality water and less waste on the seabed. It will be better to be away from the populated areas.

We need sustainable aquaculture for the future generations before we run out of fish in the ocean to feed everyone.

It will also create more jobs and that's what we need at the top of the south.

Signed

Regina Moka



16-02-17

Relocation of salmon farms in the Marlborough Sounds

Leanda Moka



I think moving the farms to faster water flow sites will be much better for the environment in the Sounds and the salmon will be much healthier growing in clean, cool flowing water. More job opportunities will be available for the region with better quality product, more sales and increased production.

23/02/17

L.A. Moka.

## Written Comment No: 0502

Subject	<b>Submission to MPI re: Salmon Farms in the Sounds</b>
From	<u>Hazel Monk</u>
To	aquaculture submissions
Sent	Monday, 27 March 2017 1:37 a.m.
Attachments	<<HJM's submssn.docx>>

Dear MPI Personnel,

It was lovely to meet your staff at the recent drop in day in Picton. They were very informative, friendly and helpful.

Please find attached my submission regarding the proposed salmon farms in the Marlborough Sounds. I hope it is in a suitable format.

Kind regards,  
Hazel Monk



# Potential Relocation of Salmon Farms in the Marlborough Sounds

## COMMENTS FORM

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

NAME: Hazel Monk

ORGANISATION (if applicable): Marlborough Branch Forest and Bird Society

CONTACT PERSON: Hazel Monk

POSTAL ADDRESS: [REDACTED] Blenheim 7201

EMAIL: [REDACTED]

DAYTIME PHONE: [REDACTED]

MOBILE: [REDACTED]

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

DATE: 25<sup>th</sup> March 2017

## I oppose the relocation proposal for the following reasons:

### 1. The process

The use of Section 360A of the RMA gives the Minister for Aquaculture power to over-ride the Marlborough Sounds Resource Management Plan. The government will have a way to give an individual firm, NZ King Salmon, a quicker and easier process to get approval to set up new salmon farms in the protected Outer Marlborough Sounds, over-riding the Marlborough Council's plans that prohibit aquaculture development in the Outer Sounds and that protect scenic and landscape values.

MDC reviews its plans annually and through submissions to these annual plans is the proper process for decisions to be made about aquaculture here. The issue should be subject to independent, strategic assessment and Environment Court scrutiny, not an *ad hoc* Ministerial decision that pits King Salmon's commercial interests against those of the local people. This is a new process of the MPI, where people must make submissions which will be looked at by a panel appointed by the government, rather than a more robust hearing, where experts would be cross-examined. And with this new process, once the MPI makes his decision there will be no right of appeal. Such a process should not be allowed.

### 2. Planning decisions should be based on scientific data

Surely we need to see that the 3 high-flow sites currently in operation (A, B and C) are operating within the S5 biethnic levels at maximum feeding levels before agreeing to more farms. The monitoring will be complete late April, with the report available in May, BUT we have to submit our comments on the proposed new farms before the 27th March! Decisions about environmental issues need to be made with foresight, with planning based on scientific data, to avoid retrospective damage control.

### 3. Increased nitrogen inputs into an already stressed environment will negatively impact the delicately-balanced ecosystem.

Although the surface area of the farmed area remains the same, NZKS propose to increase x5 the amount of fish feed...and stock with more fish, x3 which will result in more faeces and more wasted food dropping below into the sea and down to the sea floor. Despite people who live in these areas having strict controls over effluent discharge, the MPI will allow this company to discharge nitrogen effluent levels equivalent to

a Christchurch-sized city into the Sounds, if the 6 new farms get approval. We don't allow people or dairy farmers to pollute our waters so why can this industry get away with it?

If this planned change does go ahead, NZKS will release about 2000 tonnes of nitrogen, almost double the total amount of N from all other sources, (est 2400 tonnes, see Bd of Inquiry [377]).

#### **4. Endangered wildlife, notably King Shags, and fragile landscapes are being put at risk**

These birds are only found here & are classified as nationally-endangered, sensitive to disturbance when breeding, feeding and roosting. 5 proposed farms are in their area. The NZ Coastal Policy statement states we need to protect indigenous species in such areas. This conflict between the new KS farms and an endangered, voiceless but treasured bird (Ngati Kuia and Ngati Koata), plus landscape impacts, was the reason why the C of Inquiry restricted new NZKS farms here in 2013. Yet this year the salmon firm and the Minister of PI persist and want to ignore this earlier Supreme Court decision (EDS v King Salmon Ltd.) and want 5 more farms in the King Shags' area.

Apart from these birds, the smaller, harder to see flora and fauna of this area are also under threat from over-nutrition of the farmed areas. The sea floor is not just an inert, flat place. There is not much objective data collected to accurately describe what changes to the sea bed and waters have occurred at these sites and nearby over the last few years. Sustained seabed trawling, dredging and coastal forestry have made many sites extremely fragile. We need to look carefully and collect more data to monitor key indicators of the "health" of the seabed, before more sites are granted permission to be used in this manner.

"We have an ecological crisis occurring here on a similar scale to Brazil's rainforest destruction", in our Sounds, according to our coastal scientist expert at the local Marlborough District Council, February 2017. These experts have been working in our waters for years and know the potential for irrevocable damage here. Why won't our government listen to the specialists from the local government about the fragility of the ecosystem in these waters?

#### **5. Alternatives are available**

NZKS should put more effort into alternatives so that their farms to comply with effluent regulations. eg. reducing stocking densities at existing sites, or going elsewhere and not siting farms in the waters of the QC and Pelorus Sounds. They should look to site farms where there won't be potential conflict with wildlife or boats, or pollution of inland coastal waters, like offshore sites, (such as those in Norway). Where is NZKS's research into other areas of water with some cost-benefit analysis? It seems like the Sounds' sites are the cheapest option and they hope to get away with their proposals, against local council advice (see the MDC Marine Scientist's report and information in article of Feb 17th attached below) with the MPI's help.

**Further comment:** How can our government, which is meant to be representing our people, support these proposed new salmon sites and production levels, when this usurps the local council's authority, goes against previous court rulings after an extensive inquiry 3 years ago and against the wishes of the local population? The NZ Government needs to understand that our pristine coastal waters are at breaking point already and these sensitive Pelorus and Queen Charlotte Sounds cannot withstand any further degradation.

People concerned about the ecology of the marine waters of the Sounds like myself, are standing up against this company's expansion, which appears to be backed up by the present Government that both makes the rules and decides who wins.

**Conclusion:** There should be no more salmon farms in the Marlborough Sounds.

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