

## Contents Page: Sheridan – Slooten

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

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128	Sheriden	Daniel
312	Shirley	Mel
510	Silmann	Alan
261	Sim-Smith	Carina
113	Sinclair	Amber
20	Skilton	Craig
551	Skipper	Byron
144	Slooten	SC and VE

Relocation of salmon farms in the Marlborough Sounds

I agree with relocating the farms to the new selected sites because it makes sense. It's better for the environment and better for the quality of life for the salmon. The better the quality of the salmon the more we can sell and this will mean more jobs for the top of the south. The new sites are in less populated areas which means they won't interfere with peoples sporting activities or their view from their homes. The way we are raping the seas we are not going to be able to feed the worlds population forever so we need sustainable aquaculture.

Tania Sheridan

  
*T. Sheridan*

## Written Comment No: 0128

Subject	<b>NZKS Farm Relocation</b>
From	Daniel Sheridan
To	aquaculture submissions
Sent	Tuesday, 28 February 2017 1:32 p.m.

Dear MPI

My wife works for The New Zealand King Salmon Co. Ltd, we live in Nelson and are both fortunate to have interesting, professional and well paid jobs that are based in Nelson. If the swap were to go ahead, it will mean more job security for my wife and her colleagues. We love Nelson, we want to stay here, we have just purchased a house and have become part of the local Nelson community.

I also believe the site swap is a positive proposal due to the environmental implications; NZKS will be able to meet their environmental commitments and also provide better conditions to raise their salmon. This will have a positive effect on both fish health and welfare.

I hear there is often complaints from the Marlborough community that the salmon farms are an 'eye-sore' and should not be seen, moving them seems to solve this problem as the proposed sites look to be further out, in out-lying bays away from holiday homes/baches.

Again another positive.

Thanks & Kind Regards

Daniel Sheridan

Subject	Relocation of Salmon Farms Submission
From	<a href="#">Mel Shirley</a>
To	aquaculture submissions
Sent	Thursday, 23 March 2017 2:02 PM
Attachments	<<img-323140153-0001.pdf>>

Please find attached my submission regarding the potential relocation of salmon farms in the Marlborough Sounds.

Kind Regards  
Mel

**Mel Shirley** | Marketing Manager | **Aquaculture New Zealand**

Mobile [REDACTED]  
[www.aquaculture.org.nz](http://www.aquaculture.org.nz) | [www.nurturedseafood.com](http://www.nurturedseafood.com)



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# Written Comments No: 0312

27 March 2017

Salmon Farm Relocation  
Ministry for Primary Industries  
Private Bag 14  
Port Nelson 7042  
<mailto:aquaculture.submissions@mpi.govt.nz>

## Submission on Potential Relocation of Salmon Farms in the Marlborough Sounds

### Submitter Details

#### Full Name of Submitter

Mrs Melanie Jane Shirley

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#### Organisation Name (if you are submitting on behalf of an organisation)

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██████████ Richmond, Nelson 7020

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██████████

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██████████

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### 1.0 Introduction

1.1 I have a particular interest in the salmon farm relocation proposal because I work for Aquaculture New Zealand. However, I also personally believe that salmon farming in NZ is an important and sustainable industry which we should be supporting. Not only does it produce world class products, significant export earnings for NZ but companies like New Zealand King Salmon provide crucial jobs and community support in the areas in which they operate.

1.2 I support the submission of Aquaculture New Zealand (AQNZ).

1.3 I would not like to speak to my written comments at a public hearing.

### 2.0 Expression of General Support

2.1 I generally support the principles of the proposed salmon farm relocation regulation and plan changes.

2.2 Aquaculture makes a significant contribution to the communities of the Marlborough region and salmon farming is an important part of this, offering stable employment and supporting a range of local business and community activities.

2.3 The New Zealand aquaculture industry respects and values the waters it farms in and is well known for producing high quality seafood with the lightest touch on the environment. Salmon farming is one of the most sustainable sources of quality



## Written Comments No: 0312

protein on the planet and this has been recognized through Monterey Bay Aquarium's Seafood Watch 'Best Choice' rating.

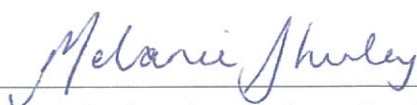
- 2.4 New Zealand's King (Chinook) salmon is recognised both at home and worldwide as a premium species of salmon and is highly valued across a range of consumers, from kiwi backyard BBQs to Michelin starred restaurants. It is also packed full of essential nutrients and has one of the highest natural oil contents of all salmon varieties, making it a quality source of Omega 3s.
- 2.5 Salmon farming is an industry we can be proud of and at the same time be excited about for our future.

### 3.0 Key Messages

- 3.1 I agree with the potential benefits that have been identified in the proposal, particularly to:
- 3.1.1. Ensure the environmental outcomes from salmon farming are improved through implementation of benthic best management practice;
  - 3.1.2. Improve the social and cultural outcomes from salmon farming by creating jobs and moving salmon farms away from areas of high competing use;
  - 3.1.3. Increase the economic benefits from salmon farming.
- 3.2 The particular principles I support include:
- 3.2.1 Support for the Best Management Practice guidelines for salmon farms in the Marlborough Sounds which were developed collaboratively with the community and experts to ensure well managed salmon farming in balance with the ecology of the Marlborough Sounds.
  - 3.2.2 Recognition that a better operating environment, ie higher flow, cooler water, means better environmental, operational and animal husbandry outcomes for salmon farming in general and particularly for New Zealand's King (Chinook) salmon species.
  - 3.2.3 Recognition that low flow, warmer sites constrain the ability for a salmon farming operation to meet the Best Management Practice guidelines while maintaining economic viability.
  - 3.2.4 Recognition that the substantial suite of analysis that guides the proposal serves to strengthen knowledge and understanding of and for the salmon industry in general and that this brings broader opportunities for New Zealand as a whole.
  - 3.2.5 Support for the robust and comprehensive analysis and consultation being carried out as part of the Resource Management Act (RMA) s360 process.

### 4.0 Additional Comments

My signature



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Send to Ministry for Primary Industries no later than 5pm on Monday, 27 March, 2017 | Private Bag 14, Port Nelson | <mailto:aquaculture.submissions@mpi.govt.nz>

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Mrs Melanie Jane Shirley

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- 1.2 I support the submission of Aquaculture New Zealand (AQNZ).
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# Written Comments No: 0312

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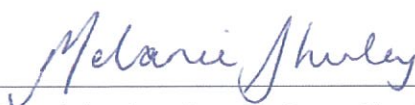
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## 4.0 Additional Comments

My signature



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Send to Ministry for Primary Industries no later than 5pm on Monday, 27 March, 2017 | Private Bag 14, Port Nelson | [mailto:aquaculture.submissions@mpi.govt.nz](mailto:mailto:aquaculture.submissions@mpi.govt.nz)

## Written Comment No: 0510

Subject	Potential Relocation of Salmon Farms in the Marlborough Sounds
From	<u>Alan Silmann</u>
To	aquaculture submissions
Sent	Sunday, 26 March 2017 11:39 p.m.
Attachments	<<Potential Relocation of Salmon Farms in the Marlborough Sounds.docx>>

Hello,

Please see attached comments.

In my opinion the salmon farms in Marlborough Sounds are ruining the beautiful views and surroundings of this unique and beautiful place.

Regards:  
Alan Silmann

## Potential Relocation of Salmon Farms in the Marlborough Sounds

### COMMENTS FORM

Comments closes 5pm, 27 March, 2017

#### Your details

NAME: Alan Silmann

ORGANISATION (if applicable):

CONTACT PERSON: Alan Silmann

POSTAL ADDRESS: [REDACTED] Blenheim

EMAIL: [REDACTED]

DAYTIME PHONE:

MOBILE: [REDACTED]

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

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

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

DATE: 26.03.17

**I OPPOSE the relocation proposal for the following reasons:**

Issue	Comment
1. Process	<ul style="list-style-type: none"> <li>• The use of Section 360A of the RMA gives the Minister of Aquaculture the power to over-ride the Marlborough Sounds Resource Management Plan.</li> <li>• It takes decision-making and resource management away from the Marlborough District Council and local community.</li> <li>• It disregards the 2013 Board of Inquiry [BOI] and 2014 Supreme Court decisions about expansion of salmon farming into prohibited areas of the Marlborough Sounds.</li> <li>• The proposal provides commercial benefit for one company, using public water space for free, above the interests of other users of the Marlborough Sounds, including iwi.</li> <li>• It sets a precedent for the Minister to make similar water-grabs around New Zealand, usurping the power of local authorities and wishes of local communities.</li> </ul>
2. Precautionary approach	<ul style="list-style-type: none"> <li>• Policy 3 of the NZ Coastal Policy Statement calls for a precautionary approach. This was reinforced by the BOI decision [par 179].</li> <li>• The three new high flow sites granted by the BOI are only just coming on stream. It would be precautionary to wait until monitoring shows the company can operate these sites, along with their other high-flow sites, to comply with the Benthic Guidelines at maximum feed levels for at least three years before any more space is considered. [consistent with BOI Condition of Consent 44a]</li> <li>• This especially applies to Tio Point, which would be the fourth salmon farm in close proximity in Tory Channel.</li> <li>• In the meantime reduce the feed and stocking rates at the low flow sites to meet the Benthic Guidelines.</li> </ul>

3. Nitrogen pollution	<ul style="list-style-type: none"> <li>• We dispute the accuracy of Minister's statement: "This proposal is about making better use of existing aquaculture space. There is no proposed increase in the total surface structure area used for salmon farming in the Marlborough Sounds," – Nathan Guy, Minister of Aquaculture.</li> <li>• The proposed relocation sites are not "existing aquaculture space". They are <b>prohibited</b> to aquaculture.</li> <li>• While farm surface area may remain about the same, there is a proposed five-fold increase in fish feed to 24,600T a year.</li> <li>• With more feed and more fish, the amount of nitrogen pollution discharged into the Sounds through salmon faeces would also increase. The high-flow farms would be discharging the equivalent of the nitrogen in sewage from a city the size of Christchurch, straight into the sea.<sup>1</sup></li> <li>• Residents must meet strict obligations to keep waste out of the enclosed waters of the Sounds. Yet this proposal would allow the untreated discharge of polluting nutrients from six new salmon farms.</li> <li>• As a land-based comparison of low flow and high flow sites, it is not OK for a dairy farmer who has been pulled up for discharging effluent into a small stream to resolve the issue by increasing his herd and discharging to a faster river.</li> </ul>
4. Offshore Alternatives	<ul style="list-style-type: none"> <li>• The NZKS Supreme Court decision ruled there was an obligation to consider alternatives under the NZ Coastal Policy Statement and Section 32 of the RMA. <b>"Particularly where the applicant for a plan change is seeking exclusive use of a public resource for private gain."</b> [SC 172-173]</li> <li>• Having salmon farms offshore (open ocean aquaculture) rather than in the confines of the Marlborough Sounds would dilute the pollution and remove the conflict with other users. This approach is being used in countries such as</li> </ul>

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



	<p>Norway.</p> <ul style="list-style-type: none"> <li>• Offshore alternatives are barely mentioned in this proposal. NZKS claims it would be achievable in 10 years but was too expensive and not yet proven. There is no information about what is happening in other countries and no cost-benefit analysis about off-shore alternatives.</li> <li>• Rather than pushing this relocation proposal for areas prohibited to aquaculture, MPI and the industry should invest in research to expedite offshore farming as a future-proofed alternative.</li> </ul>
5. King shag	<ul style="list-style-type: none"> <li>• Policy 11 of the NZ Coastal Policy Statement calls for protection of indigenous species in the coastal environment.</li> <li>• The NZ King Shag is classified as nationally endangered and is found only in the Marlborough Sounds. It is a taonga for Ngati Kuia and Ngati Koata.</li> <li>• King Shag are sensitive to disturbance when breeding, roosting and feeding. Duffers Reef to the Waitata Reach, where five new farms are proposed, are key areas for these activities.</li> <li>• The threat to King Shag was a factor in the BOI restricting the number of new farms in the Waitata Reach to two in its 2013 decision [BOI 1252 ]. Yet this latest proposal is seeking another five farms in the King Shag foraging area.</li> </ul>
6. Landscape and Cumulative effects	<ul style="list-style-type: none"> <li>• This proposal will degrade the Outstanding Natural Landscapes and High Natural Character values of the Waitata Reach. <sup>2</sup></li> <li>• The Board of Inquiry decision identified the threshold number of salmon farms for Waitata Reach as TWO – Waitata and Richmond – and turned down three others because of the cumulative effects on Landscape, Natural Character, King shag feeding and Tangata Whenua values. [BOI 1252]</li> <li>• NZKS and MPI have ignored this ruling, which was arrived at after a long and considered judicial</li> </ul>

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

## Written Comment No: 0510

	process. Instead they have joined forces and put forward this relocation proposal for FIVE more farms in the Waitata Reach. None of these farms can be justified.
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**Further comment:**

**In conclusion:**

There should be no more salmon farms in the Marlborough Sounds until NZ King Salmon shows it can operate the ones it has within the agreed benthic guidelines.

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

## Written Comments No: 0261

Subject	Relocation of salmon farms submission
From	[REDACTED]
To	aquaculture submissions
Sent	Sunday, 19 March 2017 3:28 p.m.
Attachments	<<Salmon Farm Relocation submission C SimSmith.pdf>>

Hello,

Please find attached my submission on the relocation of salmon farms.

Kind Regards, Carina

Dr Carina Sim-Smith

**CLEAR SIGHT CONSULTANTS LTD**

[REDACTED]

Auckland, New Zealand.

[REDACTED]

Salmon Farm Relocation

Ministry for Primary Industries

Private Bag 14

Port Nelson

aquaculture.submissions@mpi.govt.nz

To: The Salmon Relocation Advisory Panel

I support the potential salmon relocation process being proposed by MPI because I believe the salmon farm relocation will:

- Minimise the impact on the benthic environment caused by nutrient deposition from the farms;
- Improve the health and welfare of the fish because they will be reared in more optimal conditions resulting in lower stress, less disease and lower mortality in the fish;
- Allow for the production of more fish protein for consumers that is reasonably priced and has a much smaller impact on wild fish populations.

I believe that all 6 low-flow farms should be disestablished.

I believe that all 6 of the proposed sites will provide more optimal conditions for salmon farming than the current low-flow sites. Given that the proposed new six locations should allow productivity/surface area of the farms to increase, consideration should be given to implementing a mandatory fallowing system, where the six new proposed sites are approved but farms are required to be fallowed for a certain period of time between each production cycle. This would reduce the environmental impact of the farms and would be beneficial for disease management.

Staged adaptive management of the new farms will allow the benthic impact to be monitored and controlled if necessary. Particular care should be given to monitoring the feeding rate of fish to ensure that uneaten feed is minimised. Attention should also be paid to the digestibility of the feeds used to ensure that digestibility is maximised (without increasing the quantity of marine ingredients in the feeds).

I believe that the currently occupied low flow sites should be open to mollusc aquaculture. The sites have already been heavily impacted and there is little benthic habitat or community of significant ecological value under the sites. It is better to utilise these sites for mollusc aquaculture rather than allowing new, unimpacted sites to be farmed.

I don't believe that any of the proposed new sites would pose a greater risk to marine mammals or seabirds than the current low-flow sites. The proposed site in the Waitata mid channel poses a greater navigational hazard for boats than the current low-flow sites.

Much consideration has been given to the visual and noise impact of the proposed new sites and I think that the potential visual, landscape and noise impacts are minimal.

## Written Comments No: 0261

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

Name: Dr Carina Sim-Smith, Marine Scientist, ClearSight Consultants Ltd

Email: [REDACTED]

Phone: [REDACTED]

Date: 19/3/17



Submission For Amber Sinclair.  
Hot smoke Evening Shift.

Relocation of Salmon Farms  
in the Marlborough Sounds.

All for it, if it secures jobs  
for future generations, that  
brings peace of mind for me +  
my co workers.

Amber Sinclair



## Written Comments No: 0020

Subject	Potential relocation of salmon farms in the Marlborough sounds
From	[REDACTED]
To	aquaculture submissions
Sent	Saturday, 18 February 2017 5:01 p.m.

This sounds a great idea , the benefits to the environment are great !!!

Craig Skilton

[REDACTED]

Sent from my iPad

# Written Comment No:0551

Salmon Farm Relocation

Ministry for Primary Industries

Private Bag 14

Port Nelson

aquaculture.submissions@mpi.govt.nz

To: The Salmon Relocation Advisory Panel

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

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

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

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

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

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

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

on going work with the company.  
I think aquaculture is the way for the future  
when we look at over fished stocks around the  
world. Its good to see a company that wants  
to expand when so many companies in NZ  
are closing down, and being sold to overseas  
investors.

~~I would not~~

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

All written comments must be received by MPI no later than 5pm on Monday 27th March

Name: Byron Skipper  
Organisation/Company: NZ King Salmon  
Role: fish performance

Email:

Phone:

Date:

21/3/17

# Written Comments No. 0144

Subject	Re Salmon Farm Relocation
From	[REDACTED]
To	aquaculture submissions
Sent	Thursday, 2 March 2017 10:47 a.m.

To Ministry of Primary Industries  
Parliament Buildings  
Wellington

From [REDACTED]  
[REDACTED]  
[REDACTED]

The Proposal to move six Salmon Farms in the Marlborough Sounds is a seriously flawed one. It is already known that the seabed below the existing Salmon Farms has

become a desert in a relatively short time, where nothing exists there. The proposal to move the six farms to areas that have greater water flow, will only result in a

greater area of the sea floor killed off by the food products that drop to the sea bed floor and the effluent dropped by the fish themselves , over a slightly longer period

of time than what has occurred at the present sites.

Why has the Salmon Industry become an industry of National Importance? Why does King Salmon only have to answer to EPA and no longer to Marlborough District Council,

whose district plan would have prevented this move and the increase in farms?

Further more, why is a salmon farm being allowed to position itself in a main shipping chanel. Safety of ships is paramount.

SC & VE Slooten