

## Contents Page: Spaetzel – Stephens

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

Written Comments Number	Last Name	First Name
134	Spaetzel	Kirstin
4	Squire	Paul
578	Stanley	Rob
383	Steele	Cindy
468	Steer	Ryan
466	Stephens	Joy

Subject	<b>Submissions RE: salmon farm relocation</b>
From	Kristin Spaetzel
To	aquaculture submissions
Sent	Tuesday, 28 February 2017 4:20 p.m.
Attachments	<<C.Wells.pdf>> <<D.Ray.pdf>> <<K.Boaz.pdf>> <<K.Duff.pdf>> <<K.Spaetzel.pdf>> <<M.Leary.pdf>> <<M.Wells.pdf>> <<N.Wells.pdf>> <<S.Guy.pdf>> <<S.Wells.pdf>>

Hi,

I am writing as I have collated a number of submissions from people I know and their friends and family. Each letter is the same, however each individual has signed and dated their own copy to show their support for the idea. I felt this was the easiest way to register the support of a large number of people who are in favor of the idea of moving the sea farms but who would be unlikely to take the time to compose their own personal letter. Hopefully this will even things out as I realize people in favor are less likely to put in a submission than those who are against. Each individual has read and stated that they agree fully with the written statement. If you wish to contact any individual or obtain contact information please don't hesitate to ask.

Thank you for your time.

Regards,

Kristin Spaetzel

BSch. Marine and Freshwater Biology

To Whom It May Concern:


I wish to add my support to the proposal made to relocate certain sea farms. I believe it will be beneficial to the fish being raised, the surrounding environment, the local community, and the economy.

Regards,

Kristin Spaetzel  
Bsch.

A handwritten signature in black ink, appearing to be 'K. Spaetzel', written in a cursive style.

## Written Comments No: 0004

Subject	<b>Potential relocation of salmon farms in Marlborough Sounds</b>
From	
To	aquaculture submissions
Sent	Wednesday, 8 February 2017 3:34 p.m.

Please consider sailing yachts that due to prevailing wind and currents may not be able to navigate a straight path through the Waitata Reach or the entrance to Oyster Bay. The Waitata reach site appears to be about 1.5 miles wide before farms are introduced. Consider a sailor heading SW against wind & tide for shelter in Waitata or Richmond Bay. Will there be sufficient space for safe passage between the end of the farm and the shore given the need to tack back and forth several times to get through? Please also consider also the space needed to tack through the entrance to Oyster Bay if shelter is being sought there. The Sounds are marvellous cruising grounds but conditions often become very challenging very quickly. Safe passage free of hazards to a secure shelter is often vitally important.

Thank you for the opportunity to raise this issue. I trust it will be given diligent consideration so don't feel compelled to speak to the Advisory Panel at this stage, although I would appreciate your feedback.

Kind regards,

Paul Squire

## Written Comment No: 0578

Subject	<b>Submission for R W Stanley -The Potential Relocation of Salmon Farms in the Marlborough Sounds:</b>
From	<a href="#">Rob Stanley</a>
To	aquaculture submissions
Sent	Monday, 27 March 2017 3:08 p.m.
Attachments	<<Potential-Relocation-of-Salmon-Farms-in-the-Marlborough-Sounds-Feedback-form-Word-version.docx>>

Please find attached the Submission of R W Stanley -The Potential Relocation of Salmon Farms in the Marlborough Sounds:

Rob Stanley



Whatamango Bay

Picton RD1



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This email has been checked for viruses by Avast antivirus software.  
<https://www.avast.com/antivirus>

## The Potential Relocation of Salmon Farms in the Marlborough Sounds: Feedback form

This is the submission of;

Mr R W Stanley

Whatamango Bay

RD1

Picton 7281

Email;

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

### Questions

#### Question 1:

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

Not by setting any precedent that would open the door to further industrialisation of the Marlborough Sounds through the back door.

#### Question 2:

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

#### Question 3:

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

All.

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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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**Question 5:**

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

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**Question 6:**

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

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I am concerned that farms on high flow sites could flush pollution further into the sounds possibly affecting shellfish beds ie; scallop and cockle etc.

Will there be monitoring of seabed and shellfish beds further in and if so who pays for it?

Is monitoring twice a year adequate?

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**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?

MDC should decide whether a restricted discretionary activity not MPI.

Nothing should impede the right of our local democratically elected council to set any reasonable terms, conditions and restrictions.

Nothing should impede the rights of the public to have meaningful consultation on any activity that may affect them .

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Given the current Governments “growth at any cost” doctrine it is critical that the public have the right to be consulted on and have some control over what happens in our backyard.

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**Question 8:**

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

Yes if possible decreased and all structures single story only to blend into landscape/seascape as much as possible.

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**Question 9:**

If the sites at the existing lower-flow farms (other than Crail Bay MFL032) are vacated, do you believe that marine farming should be prohibited in these sites or do you think that these sites should remain open to other types of aquaculture for aquaculture settlement purposes?

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All should be prohibited

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**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?

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Fin fish prohibited

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**Question 11:**

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

Who decides what a “staged adaptive management approach” is and whether it is appropriate for a particular site?

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**Question 12:**

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

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**Question 13:**

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

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**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?

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**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?

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**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?

Landscapes, natural character, wildness or wilderness values are subjective and relative to a persons perspective ie a person who lives in an apartment in central Auckland will probably have a different expectation than someone who lives in rural Southland.

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These values need to be protected as much as possible to ensure we have a thriving, valuable, sustainable visitor industry in the Marlborough Sounds.

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It is simply no excuse to devalue these areas simply because they already have modified landscapes.

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Much is made of by the report on landscape and natural character about the impact of power lines tracks etc. As time goes by they will blend more into the background as the regenerating bush or even pine trees around them grow and the landscape evolve. Salmon farms will not.

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**Question 17:**

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

No mention of the impact of the actual daily operations has as they are very busy, noisy places with barge traffic loading, unloading and harvesting.

Salmon farming in the sounds is not a passive industry.

Not enough emphasis on the impact of noise and lighting at night when work is taking place.

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**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?

Don't put salmon farms there.

Height restrictions on buildings/structures.

Restrictions on the hours of actual operations re noise and light at night.

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**Question 19:**

What are your thoughts on the potential water quality effects at the potential relocation sites?

Monitoring of water quality around and under the farms must be undertaken and I suggest as MPI is so keen on this proposal that they pay for it.

Other points in the tidal stream above and below the farms should be monitored as well.

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**Question 20:**

Are there ways in which the potential relocation sites should be developed to help avoid, remedy or mitigate adverse effects on water quality?

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**Question 21:**

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

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**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?

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**Question 23:**

What are your thoughts on the seabed effects at the potential sites?

Must be monitored on, around and further into the sounds particularly for any impact on shellfish beds.

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**Question 24:**

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

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**Question 25:**

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

Impact of anchoring systems

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**Question 26:**

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

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**Question 27:**

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

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**Question 28:**

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

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**Question 29:**

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

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**Question 30:**

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

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**Question 31:**

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

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Yes.

An independently audited Biosecurity Management Plan for salmon farming? How does that work? How do you find “independent auditors” with integrity, that the public can trust to put the interests of our community and the environment over those of the aqua culture industry?

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Any BMP should include monitoring the content of feed to ensure that there is no GM/GE, anti-biotics, steroids, growth hormones or any other unwanted substances released into the ecosystem. Everything possible should be done to prevent any disease, parasites or anything that could threaten our wild fish stocks and a solid contingency plan in place which should include the immediate destocking, shut down and deconstruction of any affected farm.

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**Question 32:**

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

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Most weeks up to ten ton of rotting dead fish and sometimes more from the salmon farms go to landfill. How long are dead and rotting fish left in the cages and what effect does this have on water quality? Animal health?

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Higher fish numbers in high flow sites are still going to put more pollutants into the sounds. I am concerned that King salmon may increase their stocking rates to the point where they will have same impact on animal health and the seafloor as they do at present stocking rates on low flow sites.

What measures will be in place to protect from overstocking? How are stocking rates set?

Or will it be like it is now, push until there is a problem then worry about a solution?

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**Question 33:**

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

All farms have a much larger impact on the space than just their surface area, ie the anchoring system. They actually effectively occupy more than 4 times the surface space of the farm itself.

Anchoring systems in high flow areas will obviously be under more pressure. Will they encumber more area below the surface than the anchoring systems at existing low flow sites?

Tory channel is part of State Highway 1 is it appropriate to have structures anchored on a State Highway?

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**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?

In a word "irresponsible"

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**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?

It is interesting to note the lack of recreationalists, individuals or organisations, in the Tourism And Recreational Assessment list of stakeholders consulted.

Any industrialisation of the sounds has a serious negative impact on the amenity and aesthetic values of the area.

Just because these values are already compromised by the presence of habitation and mussel farms does not justify degrading them further.

The open spaces within the sounds are limited enough without more structures particularly out in the open water

The spin from King Salmon would have us believe that all will be good with the world if they shift/expand into high flow sites.

Is there one example of where the presence of a King Salmon farm has enhanced recreational or environmental values on and around it?

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**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?

There are none. Once the farms are there they occupy space and become an imposing feature on the landscape totally destroying any sense of open space.

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**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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**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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Industrialisation of the sounds will always have a negative impact on the quality of the recreational experience for residents and visitors alike.

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If the proposed processing plant is actually built in or near Picton with the promised jobs for real, not just spin, then that may be a positive as long as local workers are used.

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

I have serious misgivings about the way the Minister and MPI are engineering the expansion of King Salmons farms in the Marlborough Sounds and threatening to effectively override the MDC Environment Plan and the ratepayers of Marlborough.

A plan that was developed, as required by the RMA, with meaningful consultation with the wider Marlborough community over a period of eight years at a significant cost to Marlborough rate payers

It has been obvious to the public from the beginning that the outcome has already been decided and MPI will do whatever it takes for the relocation to proceed.

A democratically elected Minister, over riding the rights of Marlborough ratepayers to a democratic process and leaving the only course for ratepayers to object, an extremely costly journey through the high court.

**No matter what the outcome it should not mean more expense for ratepayers or dilution of their rights to have input on activities that may have adverse effects on our environment or our enjoyment of it.**

If MPI and the minister want to override the democratic process and force the changes then they or King Salmon should be responsible for any costs involved implementing, monitoring etc. not the Marlborough ratepayer.

I am not anti - aquaculture as much as I am against the changes to any process that denies taxpayers and ratepayers of the right to have affordable, effective input on issues that affect our environment.

Particularly when the issue is one that impacts on our natural resources in favour of overseas interests.

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[illegible]

## Written Comment No: 0383

Subject	NZKS Farm Relocation Submission - Cindy Steele
From	<a href="#">Cindy Steele</a>
To	aquaculture submissions
Sent	Friday, 24 March 2017 1:28 PM
Attachments	<<MPI Submission - Cindy Steele 20170324.pdf>>

Hi,  
Please see my submission attached.  
Kind Regards,  
Cindy

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Cindy Steele, Senior Product Development Technologist



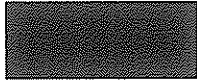
M: [REDACTED] | W: [www.kingsalmon.co.nz](http://www.kingsalmon.co.nz) | A: 93 Beatty Street, Tahunanui, 7011



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Cindy Steele



Nelson

Friday 24<sup>th</sup> March, 2017

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

My name is Cindy Steele and I have worked with New Zealand King Salmon [NZKS] for nearly 14 years. I started my time as an Export Sales Coordinator, but soon became involved in the Product Development department. I studied in New Zealand at Massey University and gained a Bachelor of Technology Degree with Honours. I am married, have two young children and a mortgage.

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

I enjoy working with such a healthy product and feel satisfied that what I do has a positive impact on people's quality of life. We are constantly working to understand what is required to make salmon consumption improve people's intake of Long Chain (LC) Omega 3 acids. It is important that humans (and animals) maintain an Omega 3 to Omega 6 ratio of 1:1 through their diets. Omega 3 is anti-inflammatory while Omega 6 is inflammatory (GB HealthWatch,n.d.). The western diet has an Omega 6 level approximately 15-17 times than that of Omega 3 (GB HealthWatch,n.d; Simopoulos, 2002). This leads to inflammation and then the body cannot defend itself against various diseases such as arthritis, diabetes and other autoimmune disorders. NZKS sends its salmon to the Cawthron institute to be tested for Omega 3 and Omega 6 levels every month. The average result for a 3-5kg sized salmon, skin off, in 2016 was an Omega 3 to Omega 6 ratio of approximately 1:1 (results are available on request). NZKS is currently working with feed companies to reduce the levels of Omega 6 further in order to achieve an even better ratio to help the population combat this dietary imbalance.

Salmon is important for the health of people, not only in New Zealand, but world wide. The world's population is rising and is projected to reach 9.7 billion by 2050 (United Nations, 2015). Therefore, more salmon needs to be produced, not less. Farming salmon is one of the most sustainable



farming practices and this needs not be overlooked; especially now with the newly established Best Practice Guidelines that was agreed by the Council and community. In order to grow good quality salmon, they need to be grown in the correct growing conditions. Much more is known about this science since the farms were originally decided upon. It just makes sense to relocate them to high flow sites. A lot of work has been undertaken to determine ideal locations whilst not increasing the surface area taken up by salmon farms. This surely is best for all involved.

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.

By improving the quality of the surrounding environment, this in turn improves the salmon growing in this environment. With better quality fish, it ensures the best prices are achieved, therefore better economic benefits. It also helps staff members across the whole NZKS business from processing, to product development to sales teams.

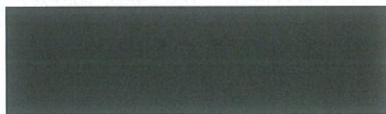
Lastly, by allowing the farm swap to go ahead this will not only ensure job security for me but generate more employment opportunities for the top of the south.

I strongly believe that by relocating the salmon farm sites it is of great benefit and best interest of the whole country.

Please contact me if you have any questions.

Kind Regards,

Cindy Steele



### References

GB HealthWatch. (n.d.). *Omega-3 : Omega-6 balance*. Retrieved from <http://www.gbhealthwatch.com/Science-Omega3-Omega6.php>

Simopoulos AP. *The importance of the ratio of omega-6/omega-3 essential fatty acids*. Biomedicine & Pharmacoltherapy. 2002 Oct;56(8):365-79

United Nations, Department of Economic and Social Affairs (29 July 2015). *World Population projected to reach 9.7 billion by 2050*. Retrieved from <http://www.un.org/en/development/desa/news/population/2015-report.html>

## Written Comments No: 0468

Subject	<b>Farm relocation</b>
From	<u>Ryan Steer</u>
To	aquaculture submissions
Sent	Monday, 27 March 2017 4:48 p.m.

To whom it may concern

I support all of the sea farm relocations.

As a growing industry these farm relocations will provide more employment to the top of the South Island.

Aquaculture in my belief is the future of producing good quality protein for human consumption. While this needs to be conducted in a way that is environmentally friendly, I feel New Zealand King Salmon (NZKS) approach farming in a way that is proactive and provide the best possible care for their stock. By relocating the sites in question this will provide better water in which to raise salmon, improving the quality of health and mitigating some environmental concerns.

In my opinion there is no good reason for these site relocations to not occur.

Thank you  
Ryan Steer

Sent from my iPad



## Written Comments No: 0466

Subject	<b>King salmon submission</b>
From	<u>Joy Stephens</u>
To	aquaculture submissions
Sent	Monday, 27 March 2017 8:50 a.m.
Attachments	<<Relocation of Salmon Farms submission. JS.docx>>

Please find my submission about the NZ King Salmon New Farms proposal.

Yours sincerely,

Joy Stephens 

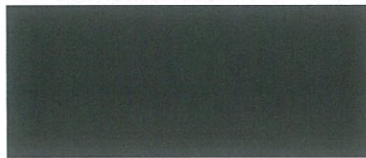
## Potential Relocation of Salmon Farms in the Marlborough Sounds

### COMMENTS FORM

Comments closes 5pm, 27 March, 2017

#### Your details

NAME: Joy Stephens  
ORGANISATION (if applicable): None  
CONTACT PERSON: Joy Stephens  
POSTAL ADDRESS:  
EMAIL:  
DAYTIME PHONE:  
MOBILE:



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

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

DATE: 26 March 2017

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

## Written Comments No: 0466

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>

## Written Comments No: 0466

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</li> </ul>

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

## Written Comments No: 0466

	<p>approach is being used in countries such as 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</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 Comments No: 0466

	<p>Whenua values. [BOI 1252]</p> <ul style="list-style-type: none"><li>• NZKS and MPI have ignored this ruling, which was arrived at after a long and considered judicial process. Instead they have joined forces and put forward this relocation proposal for FIVE more farms in the Waitata Reach. None of these farms can be justified.</li></ul>
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### **Further comment:**

A Cawthron report has shown that NZ King Salmon has not been operating existing farms in the Marlborough Sounds in a way which enables them to meet best practice guidelines. Instead of being made to clean up their act, they would be given new pristine waters. It seems the Government wants to set a precedent for over-riding local consultation and existing judicial decisions about the expansion of salmon farming in the Marlborough Sounds. This is **not** how we do things in New Zealand!

### **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.