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

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Written Comments No: 0480

Subject	Submission to Potential Relocation of Salmon Farms in the Marlborough Sounds.
From	[REDACTED]
To	aquaculture submissions
Sent	Sunday, 26 March 2017 1:54 p.m.
Attachments	<<Submission Form Page 1.pdf>> <<Submission Form Page 2.pdf>> <<Potential Relocation of Salmon Farms in the Marlborough Sounds.pdf>>

Hello

Please find attached submission form, and further 6 pages with our additional comments.

Thank you

Kristen and Michael Gerard

Written Comments No: 0480

To: Salmon Farm Expansion
Ministry for Primary Industries
Private Bag 14
Port Nelson 7042

Email before 5pm, Monday 27 March 2017
to:
aquaculture.submissions@mpi.govt.nz

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	
MICHAEL GREGGORY & KRISTEN DENISE CHESTER GERARD	
Address	
HAWKESBURY 7150 MARLBOROUGH SOUNDS	
Email	
Telephone (day)	Mobile
<input checked="" type="checkbox"/>	I am against the whole Ministry for Primary Industries (MPI) proposal for "Potential Relocation of Salmon Farms in the Marlborough Sounds"
<input checked="" type="checkbox"/>	I would like to speak to my written submission at a public hearing in <u>marlborough</u>
<input type="checkbox"/>	I do not want to speak to my written submission at a public hearing

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

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

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

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

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

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

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

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

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The Board of Inquiry drew the limits

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

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

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

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

The best Place for Salmon Farming?

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

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

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

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

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

Other Comments:

Please see attached personal submission with our comments on particular aspects of this proposal. (6 pages)

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

Written Comments No: 0480

Potential Relocation of Salmon Farms in the Marlborough Sounds.

Submission to – aquaculture.submissions@mpi.govt.nz

From – Kristen and Michael Gerard,

[REDACTED] Hopai Bay,

Pelorus Sounds, Marlborough

e-mail – [REDACTED] [co.nz](mailto:[REDACTED]@co.nz)

phone – [REDACTED]

Introduction –

This submission is from Kristen and Michael Gerard, farmers, of Hopai and Elie Bays, Pelorus Sounds. Our property of 1250 ha which we have farmed since the 1980s includes 165 ha of mixed forestry, and 160 ha of actively farmed grasslands. The remainder of the farm is retired regenerating native hill country that is being managed as part of the Marlborough District Council's Significant Natural Areas programme.

We were winners of the Farming Award in the 2015 Cawthron Marlborough Environment Awards.

Submission Points –

We fully back the submission of the Kenepuru and Central Sounds Residents Association, as we are aware that several of its members were a part of the Salmon Farm Working Group, and as such have put their considerable knowledge into their submission.

However, we also wish to make several points of our own -

1. Sustainable farming practices.
2. Protecting the integrity of the Marlborough Sounds Resource Management Plan.
3. Protecting the equilibrium of the Marlborough Sounds' communities.
4. Cumulative effects of this Proposal on the Sounds.

Point 1. Sustainable Farming Practices – on land and water.

As mentioned in our introduction, a major focus of our farming practices today revolve around assessing what is sustainable both financially and environmentally on the land we own.

All land based farmers are constantly being critically assessed by the wider New Zealand public as our farming footprint and impacts are highly visible.

As responsible landowners, we want our businesses to be sustainable for the next generation – we do care about our environment, and the way we farm, and accept that it must be left in a resilient state for the future.

Therefore, putting it quite bluntly -it is absolutely essential to all who farm both on land and in the water -**that you do not shit in your own nest.**

What this means in practical terms is that for those who farm both **close to** the water – and **in** the water, the focus must also be on the wider picture so that what we do in our “patch” has minimal impacts on the others in our vicinity, and that at the end of our time here, we leave our “patch” in a better shape than when we started.

There is a lot of publicity at present about the *“swimmability of rivers”* in New Zealand.

This is also relevant to coastal waters, and salmon farms do have a detrimental effect on water quality. Some years ago we were concerned to hear that residents in Bulwer, Pelorus Sounds (adjacent to the Waihinu salmon farm) could not safely swim in the area due to concerns about both the quality of the water, and also the numbers of sharks frequenting the area.

Over the past 30 years there have been at least 3 different attempts to farm fish within the Crail Bay side-arm of the Pelorus (our land is all on the eastern shores of this bay), so we are reasonably well aware of the problems that have occurred at these farms which we believe were mostly due to unsuitable water temperatures, depths and currents.

We think it is totally inappropriate to suggest that King Salmon should be allowed to re-locate their Crail Bay licences for another more suitable site, as they have not used the site-

apart from harvesting the few fish they inherited – since 2011. They took these sites on knowing their limitations, so if they can't farm them within the new Best Practice Guidelines, then that is totally their problem.

Why the other salmon farm sites at Ruakaka, Otanerau, Forsyth and Waihinu should be given new, fresh water-space (after they have mucked-up the place they had already been given) is completely wrong, a travesty of farming-within-your-means justice; and Political interference on a scale that is hugely unsettling to most residents of the Marlborough Sounds.

We think that fin-fish farming in the enclosed waters of the Marlborough Sounds has had its day, and that if New Zealanders want to continue with this form of aquaculture, then it is imperative that more effort should be put into how to use offshore and/or land-based sites.

Point 2. The Marlborough Sounds Resource Management Plan

Ever since we started living in the Sounds, we have been involved with Local Councils on the formation of all the various planning documents for the Marlborough Sounds. All of these Plans have evolved through consultation with the community – farmers, foresters, aquaculturists, residents, holiday makers and recreational users, over many years and changes of land and water use.

During those consultations, proper thought was given to identifying the special land and sea-scapes, headlands, Scenic Reserves, areas of high recreational use and main navigational channels, social and amenity values, as well as looking at all the land and water-based users to determine where aquaculture and/or other commercial activities/developments may – or may not be appropriate. A thorough and rigorous process, by local people, for local people to assess what the community wants and where, and conversely what it doesn't want.

The following paragraph is taken from our 2012 submission to the BOI, which serves as a reminder of how important this place is – not just to those of us in Marlborough.

The Marlborough Sounds is a world-renowned area for the beauty of its land and seascapes, which combined are what make New Zealand distinctive. Those of us who have the privilege of living here meet many tourists, both

Written Comments No: 0480

kiwis and foreigners, throughout the year who keep reminding us of our fortune to live in such a place. They all without exception comment on the natural beauty of the Sounds, and how important it is to preserve and protect it for future generations.

So, we firmly believe that the local government Resource Management Plans are the appropriate environmental process, and one which all the community understands and works with – and can seek changes to through proper local government processes, e.g. Plan updates, changes and RM hearings.

The Government must stop interfering in the Marlborough Sounds, and allow the local Council to do its job – to set Rules and Regulations through its local plan after consultation with the community, and then to hear any Resource Consent Hearings with the Plan as its guideline.

Point 3. Protecting the Equilibrium of the Sounds' Communities

It is essential for the equilibrium of our Marlborough community, that the integrity of the Marlborough Sounds Resource Management Plans be respected; and we believe that Government interference on behalf of a company – that still to our understanding has a majority foreign ownership, should not be happening.

Our family was heavily involved in the 2012/2013 King Salmon Board of Inquiry process, as several of those farms were proposed for the outer Pelorus Reach (where 5 of these current relocation sites now are) and also another was proposed to be located in Port Gore where we have family land interests.

We can sum that year up as a year of hell – reading thousands of pages of documents, attending many of the days of Hearings and finally several of us submitting to the BOI.

That process shattered lives, cost individuals (as well as the Company) dearly, destroyed friendships, and totally unsettled communities throughout the Sounds – Havelock, Blenheim and wider afield.

However, having seen that BOI process in action, we find it incomprehensible that such a major relocation plan as this current one can even be considered given the BOI findings - plus the findings of the Environment Court and finally the Supreme Court.

The huge amount of evidence they were all given, the experts they talked to – and cross examined, took months/years, and resulted in a small expansion of the industry.

As a community, we have finally accepted that those expansions were acceptable given the extraordinarily high degree of scrutiny they were subjected to – and yet now we are supposed to accept the feasibility of another six new sites, with a markedly less rigorous process?

Point 4. Cumulative Effects of this Proposal on the Sounds.

We understand that there will be submissions from experts on the effects this Proposal could have on water quality, water columns and the benthos, so we will leave that discussion to them. But, if it does go ahead, we note that there would actually be 7 salmon farms in a small area of the Pelorus Sounds (including the 2 already consented by the BOI) – all 7 of which would be effectively placed in the **“Mouth and lungs of the Pelorus”**.

Although we are not experts, we find this an incredibly disturbing thought bearing in mind that all the rest of us who live, work and play in the central and inner Pelorus Sounds will obviously have our waterways impacted by these farms. Much emphasis has been put on placing new salmon farms in high tidal current areas – but this current goes both ways – in and out, and as such works as the lungs of the entire Pelorus Sound waterways.

We also have grave concerns for the cumulative effects 7 new salmon farms would have on both navigation and landscape in this area of the Pelorus.

Navigationally, the effects of night-time lighting from each salmon farm would be challenging for those boating through the area – we are well aware of how disorientating mussel-farm lights are at night, and can see that this proposal would dramatically upscale those impacts in this area.

We would also have concerns if the placing of any new aquaculture sites were to impede navigational traffic of larger vessels – for example logging barges, and visiting cruise ships.;

or some of the larger yachts like *The Spirit of New Zealand*, - all of which have been regular visitors in the past.

If this proposal goes ahead, the whole land and sea-scape of this area of the Pelorus would be dramatically altered and in a very negative way. There is no way to hide these structures, as anyone who has been on the Cook Strait ferry knows only too well.

We have heard it stated many times that the Pelorus is the industrial Sound, which attempts to imply that any and all development here is acceptable. But on the contrary, we know that much of the land in the Sounds is being actively assisted to regenerate, and the focus for many landowners has changed markedly in recent times as nature-tourism to these beautiful remote areas has increased. People come here for a unique Sounds' experience, and this Proposal puts all those remote, visual and sensory experiences at risk. We think that the negative visual impacts 7 new salmon farms would have on the Tui Nature Reserve for instance, would be highly significant.

Conclusion

We do not accept any part of this proposal to relocate 6 existing salmon farms within the enclosed waters of the Marlborough Sounds. We are very familiar with all five of the Pelorus Sound suggested sites, and do not believe that environmentally, socially or responsibly there is any case at all to support moving existing farms onto these "fresh field" sites.

The only benefit is to King Salmon, and we absolutely cannot accept that their benefits should be of more importance to the Government than that of the rest of the Marlborough community – and the Sounds' environment, both of which will be negatively impacted.

Our belief is that King Salmon must farm their current consented sites to the new Best Practice Guidelines, and if that is not feasible/financially viable – or whatever, then they must consider alternative options for their aquaculture ventures.

Kristen and Michael Gerard, 26/03/17

Written Comments No: 0527

Subject	Salmon Farm Expansion, Marlborough Sounds
From	Patrick Gerard
To	aquaculture submissions
Sent	Sunday, 26 March 2017 8:04 p.m.
Attachments	<<King Salmon Submission GERARD.pdf>>

To whom it may concern,

Please find my attached submission, which is the template submission that has been provided by the Kenepuru and Central Sounds Residents' Association. I fully support the position they have taken on this matter. I would also like to acknowledge my support for the submission by Kristen and Michael Gerard.

Sincerely,
Patrick Gerard

Written Comments No: 0527

To: Salmon Farm Expansion
Ministry for Primary Industries
Private Bag 14
Port Nelson 7042

Email before 5pm, Monday 27 March 2017
to:
aquaculture.submissions@mpi.govt.nz

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 <i>Patrick John Michael Genard</i>	
Address	<i>Wellington</i>
Email	
Telephone (day)	Mobile
<input checked="" type="checkbox"/>	I am against the whole Ministry for Primary Industries (MPI) proposal for "Potential Relocation of Salmon Farms in the Marlborough Sounds"
	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.

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:

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

Written Comments No: 0457

Subject	Submission against salmon farming expansion
From	Hanneke & Joop
To	aquaculture submissions
Cc	[REDACTED]
Sent	Sunday, 26 March 2017 11:23 a.m.
Attachments	<<Submission_Gibbs.pdf>>

see attachment

Written Comments No: 0457

To: Salmon Farm Expansion
Ministry for Primary Industries
Private Bag 14
Port Nelson 7042

Email before 5pm, Monday 27 March 2017
to:
aquaculture.submissions@mpi.govt.nz

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	
Francina S. Gibbs	
Address	
[REDACTED]	
Email	
[REDACTED]	
Telephone (day)	Mobile
<input checked="" type="checkbox"/>	I am against the whole Ministry for Primary Industries (MPI) proposal for "Potential Relocation of Salmon Farms in the Marlborough Sounds"
<input type="checkbox"/>	I would like to speak to my written submission at a public hearing in
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The Board of Inquiry drew the limits Written Comments No: 0457

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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:

I object to any more salmon farms because the pristine tidal flow into the Kenepuru will be diminished and we do not need a navigational hazard in the channels.

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

Written Comment No: 0548

Salmon Farm Relocation

Ministry for Primary Industries

Private Bag 14

Port Nelson

aquaculture.submissions@mpi.govt.nz

To: The Salmon Relocation Advisory Panel

Craig Gilbert, working for 10 years at Tentburn Hatchery participating in the whole operation at the farm.

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.

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

Note: There is no need to sign your submission if you are emailing it from your email address.

Name: Craig Gilbert

Date: 15/03/17



Email:

Phone:



Written Comments No: 0021

Subject	Share 'Submission on Salmon Farm Relocation Proposal.docx'
From	[REDACTED]
To	aquaculture submissions
Sent	Sunday, 19 February 2017 2:31 p.m.
Attachments	<<Submission on Salmon Farm Relocation Proposal.docx>>

Salmon Farm Relocation

Ministry for Primary Industries

Private Bag 14

Port Nelson 7042

New Zealand

Submission on Salmon Farm Relocation Proposal

My name is Heather Gillard, I am married to Mark Gillard the Sustainability Manager at The New Zealand King Salmon Company. I can be contacted at heathergillard14@gmail.com.

As a family we have been associated with the salmon industry since 1979. It has been my husband's career.

As a family we have always received a good income that enables us to live without going without. It also enabled us to have one of our two children attend boarding school then university. Both of our children went to the French Pass School and we were active in the local community.

We have lived in some interesting places including Inch Clutha in South Otago and for nine years we lived in Hallam Cove in the outer Pelorus Sound.

We eat fresh Regal salmon at least once each week and we always have several packets of smoked in our freezer, it is a beautiful product, visitors love it and it is a winner when taken to a BBQ. Cold smoked salmon on hot toast for breakfast is awesome.

Mark has explained the proposal to me and I cannot think of any negative issues that would stop this proposal being successful. I have travelled around the sounds in boats and on land and do not consider the locations of the farms to be an issue for normal mariners. As Mark says if they are likely to hit a salmon farm they should not be in charge of the vessel and especially should not be navigating in the outer sounds.

I am pleased to hear there will be more jobs available and that the security of those jobs will be improved with these new farms. Our son works in the Nelson processing plant, the working environment is really good with great staff management. An example of that is recently my son was helped in a personal matter without any prompting. That is the difference between a basic workplace and caring workplace.

I understand that the Best Management Practice guidelines will be adopted for managing the seabed, Mark was involved in the development of those standards. That is a major step forward as it gives everyone comfort that the environment is being looked after.

I believe there will be a serious error of judgement if this process does not go ahead. Those against it are misguided, they cannot see the bigger picture. They should recognise that the potential benefits to New Zealand are enormous.. Do they really want to see jobs lost? That would be a disaster for the top of the south and elsewhere. If that did happen then I would personally blame those who are submitting against this proposal.

I strongly believe that this proposal should go ahead and that all six sites are relocated. It may be a one off opportunity to get salmon farming in to areas that suit salmon within the Marlborough Sounds.

Please consider this proposal favourably.

I do not wish to appear before the panel.

Heather Gillard

19 February 2017

Written Comments No: 0022

Subject	Salmon relocation
From	Paul Gillard
To	aquaculture submissions
Sent	Sunday, 5 March 2017 10:45 a.m.
Attachments	<<Salmon Farm Relocation.pdf>>

Please find attached my submission on the site relocation process.

Regards

Paul Gillard

Written Comments No: 0022

Salmon Farm Relocation

Ministry for Primary Industries

Private Bag 14

Port Nelson 7042

My name is Paul Gillard. I am an employee of The New Zealand King Salmon Company.

I work in the processing factory in Nelson. I have worked there for over 6 years.

I do not earn a lot but have been able to buy a car, a small house and more recently a mountain bike because of my job. I get full time employment and overtime. My employer is very health and safety conscious and looks after its employees. I feel safe at work.

My dad is also employed by the company he has been there for over 30 years.

I have had a read of the summary consultation document and my boss has also explained what is proposed. I think it is a good idea that the farms will get moved to the higher flow sites because it will make more jobs and my job will be more secure.

When the farms are moved the fish will be better quality because they will be grown in water with more water flow. That will mean we will be able produce a better product for people to buy.

By moving some of the farms away from houses there will be less opportunity for people to complain, the environmental benefits from adopting the Best Management Practice guidelines will help the farms manage the effect on the seabed and will also set the levels so that the Marlborough District Council can check that the farms are being managed to the agreed levels.

The public should be happy if the farms are moved for a range of reasons these are set out in the consultation document.

I agree fully with what is proposed.

I do not wish to appear before the hearings panel.

Yours sincerely

Paul Gillard

5 March 2017

Written Comment No: 0597

Subject	Relocation of Salmon Farms in the Marlborough Sounds
From	[REDACTED]
To	aquaculture submissions
Sent	Sunday, 19 February 2017 6:47 p.m.
Attachments	<<P Gillard Potential-Relocation-of-Salmon-Farms-in-the-Marlborough-Sounds-Feedback-form-.pdf>>

Attached is my submission.

Paul Gillard
General Counsel and Company Secretary

[REDACTED]
This communication is confidential and may also be legally privileged. If it is not intended for you, please contact me immediately, and do not use, distribute, copy or retain it.

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

From: Paul Gillard

[REDACTED]

[REDACTED]

[REDACTED]

- emailed to aquaculture.submissions@mpi.govt.nz
- posted to
Salmon Farm Relocation
Ministry for Primary Industries
Private Bag 14
Port Nelson 7042

Consultation questions

These questions are designed to stimulate your thinking and help us report back clearly on people's written comments. There are also spaces after each question on the feedback form for additional comments. These questions are the same as those in the consultation document.

Please make sure it is clear which aspect of the proposal (including question number if appropriate) you are commenting on.

MPI will consider all relevant material made in your written comments, so you are welcome to provide information supporting your feedback. Please make sure you include the following information in your written comments:

- the title of the consultation document
- your name and title
- your organisation's name (if you are submitting on behalf of an organisation), and whether your written comments represents the whole organisation or a section of it
- your contact details (such as, phone number, address, and email).

Written comments are official information

Please note that your written comments are official information. Written comments may be subject of requests for information under the Official Information Act 1982. The Official Information Act specifies that information is to be made available to requestors unless there are sufficient grounds for withholding it, as set out in the Official Information Act.

Written Comment No: 0597

Persons who make written comments may wish to indicate grounds for withholding specific information contained within their feedback, such as if the information is commercially sensitive or if they wish, personal information to be withheld. The Ministry for Primary Industries will take such indications into account when determining whether or not to release the information.

Public hearings

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

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

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

<input type="checkbox"/>	I would like to speak to my written comments at a public hearing
<input 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?

Yes I do. I think all six should be allowed to relocate

Question 2:

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

I believe that King Salmon are in the best position to determine the appropriate location of the relocation sites. Therefore, I am happy with the relocation sites chosen by King Salmon.

Question 3:

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

I believe that King Salmon are in the best position to determine the appropriate lower-flow sites for relocation. Therefore, I am happy with the lower-flow sites chosen by King Salmon.

Question 4:

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

I do not have any concerns. I believe King Salmon have addressed any concerns adequately.

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Question 5:

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

I think the potential benefits of relocating the farms have been appropriately identified on the MPI website.

Question 6:

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

I do not believe that any additional rules, policies or conditions should be added. King Salmon has an interest in ensuring that its farms are properly managed in accordance with existing rules, policies and conditions, and these have been shown to be effective in ensuring appropriate regulatory and commercial outcomes, with appropriate balance.

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?

Yes I do. Salmon farming, together with other sea farming activities, is an extremely important industry for New Zealand.

Question 8:

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

I would be happy for the overall surface structure of salmon farms to be increased. In order to provide for continued growth in the sustainable aquaculture industry in New Zealand, we need to be flexible in allowing for industry expansion.

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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?

I am happy for these sites to be left open to other types of aquaculture.

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?

I have no issue with shellfish farming at this site

Question 11:

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

I have no preference other than to say that whatever best supports a quick and efficient growth in the industry is preferred

Question 12:

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

No comment

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Question 13:

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

No comment

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?

No comment. This is for King Salmon to decide

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?

Like a lot of New Zealanders, I am sick and tired of certain activists who continue to adopt a “Trumpian” approach to the debate by simply ignoring the scientific evidence and putting forward “alternative facts” when pushing their own agendas.

I think activists should be reminded of the costs involved in responding to their untested assertions.

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?

I am very supportive of King Salmon’s approach to mitigating the visual impacts on the environment.

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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 comment

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?

No comment

Question 19:

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

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?

No Comment

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Question 21:

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

No comment

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?

No comment

Question 23:

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

I think the impact will be minimal, and in any event will be significantly less than the current sites

Question 24:

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

No comment

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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?

No comment

Question 26:

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

No comment

Question 27:

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

No comment

Question 28:

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

No comment

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Question 29:

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

No comment

Question 30:

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

No comment

Question 31:

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

No. Just more cost to be absorbed by the industry

Question 32:

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

I understand the new sites provide for better health outcomes for the salmon, and should be supported on that basis

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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?

No

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?

The cruise ships and superyachts can work around the farms. Most rational people understand that there needs to be a balance between the need for jobs and the environment – we are a farming nation after all

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?

The sites can be promoted as a partnership between the people and business, matching environmental needs against the need to provide jobs for the local community.

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?

See answer to question 35

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Question 37:

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

No comment

Question 38:

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

No comment

Question 39:

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

No comment

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?

No comment

Written Comment No: 0597

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

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

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