Contents Page: Moon – Myers

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

Written Comment No: 0552

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?

Ongoing or contracting work, benefitting both myself and the business that service my stay, (accomadation, food, entertainment, etc).

I would/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: Reece Moon

Organisation/Company: Black hat ltd

Role: Owner operator

Email: [redacted]

Phone:

Date: 21/3/17

Written Comment No: 0437

Subject	**Fwd:**
From	Charles Park
To	aquaculture submissions
Sent	Monday, 27 March 2017 10:34 a.m.
Attachments	<<scan.pdf>>

Many thanks,
Charlie.

Charlie Park
NZ King Salmon
Tory Channel Regional Manager
[redacted]

---------- Forwarded message ----------
From: "Ngamahau Farm" [redacted]
Date: 27/03/2017 10:33
Subject:
To: "Charles Park" [redacted]
Cc:

Written Comment No: 0437

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

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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?

My Name is Steve Ive been with the company for 6 years without king salmon i wouldnt be here due to picton being very limited. we get well looked after done courses, tickets, trips etc.... Our community will benifited from the next big move will open up atot of job. i myself drive the sov for NZKS i can say that the high flow site we currently have is very clean.

I **would/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: Steve Moore

Organisation/Company:

Role: Farm worker

Email:

Phone: [redacted]

Date: 27.05.17

Written Comments No: 0467

Subject	**Submission agains salmon farming expansion**
From	Hanneke & Joop
To	aquaculture submissions
Cc	tracywebb@yahoo.co.nz
Sent	Sunday, 26 March 2017 12:11 p.m.
Attachments	<<Submission_Moore.pdf>>

See attachment

Written Comments No: 0467

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

Email before 5pm, Monday 27 March2017
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 Tracy Castle Moore (nee Welch)
Address
Email [redacted]
Telephone (day) n/a Mobile [redacted]

V	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 _____
	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:

As recreational fisherman I want to keep Waitata reach for wild fish, not farmed fish Farm, in the middle of the channel is a navigation hazard.

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

Written Comment No: 0479

Subject	**Fwd:**
From	Charles Park
To	aquaculture submissions
Sent	Monday, 27 March 2017 8:21 a.m.
Attachments	<<scan.pdf>>

Many thanks,
Charlie.

Charlie Park, Tory Channel Regional Manager.

New Zealand King Salmon

M: [redacted] | **W:** www.kingsalmon.co.nz | **A:** 43 Dublin Street, Picton

REGAL

ŌRA KING

---------- Forwarded message ----------
From: **Te Pangu Farm** [redacted]
Date: 27 March 2017 at 20:43
Subject:
To: Charles Park [redacted]

Written Comment No: 0479

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?

My name is David Moore I work for NZKS My role is day team/Wetcleaner. ~~Five~~ worked for NZKS for close to 4 years and love everyday of it. By relocating the farm will keep NZKS going putting fish on our plates and wages to put the fish on our plates for our families. This will also open up more jobs for people in the area, from my point of view the area is lacking alot of jobs.

~~I~~ **would/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: David Moore

Organisation/Company: NZ King Salmon

Role: Salmon farmer

Email: [redacted]

Phone:

Date: 27-3-17

Written Comments No: 0358

Subject	**Farm Relocation support**
From	RTE2 Mailbox
To	aquaculture submissions
Sent	Friday, 24 March 2017 8:59 AM

To: The Salmon Relocation Advisory Panel

From: Liza Morgoun
NZ King Salmon Company
RTE Department , Labeller
I support the potential salmon relocation process being proposed by MPI because I believe the salmon farm relocation will provide for better environmental, social and economic outcomes.
I understand that by relocating farms from lower water flow sites to higher water flows sites fish performance will improve and therefore the health of the salmon. It will also have a lower level of effect on the seabed which will have positive environmental benefits.
Environmentally adopting the Best Management Practice guidelines that were agreed by the Council and community is the future of aquaculture globally.
There will be more direct and indirect jobs created if this proposal goes ahead resulting in economic improvements for the communities in the top of the south.
Moving some farms away from baches to more remote locations will improve social amenities which is also a good thing.

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

Written Comment No: 0433

Subject	**Submission of Potential Relocation of Salmon Farms in the Marlborough Sounds**
From	Karen Morley
To	aquaculture submissions
Sent	Monday, 27 March 2017 10:50 a.m.
Attachments	<<img-327104520-0001.pdf>>

Karen Morley | Business Manager | **Aquaculture New Zealand**

[redacted]

a resilient and prosperous sector

farming goodness

NEW ZEALAND AQUACULTURE

Please consider the environment before printing this email

Written Comment No: 0433

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

Karen Morley

[redacted] **Richmond, Nelson**

[redacted]

[redacted]

1.0 Introduction

1.1 I have a particular interest in the salmon farm relocation proposal because I work in the aquaculture industry.

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 fully 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 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-3.

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 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

Thank you for the opportunity to make a submission on this proposal.

Written Comment No:0425

Subject	**Submission**
From	Tony & April Morris
To	aquaculture submissions
Sent	Saturday, 25 March 2017 9:56 a.m.
Attachments	<<170306-SubmissionForm.pdf>>

Please find attached our submission.

Thank-you

Written Comment No:0425

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

Email before 5pm, Monday 27 March2017
to:
aquaculture.submissions@mpi.govt.nz

Written Comment No:0425

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	April Morris		
Address	Blenheim 7201		
Email	[redacted]		
Telephone (day)	[redacted]	Mobile	[redacted]

☐	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
☐	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:

We only get one chance to protect the sustainability of the sounds for furture generations, surely protecting our landscapes and waterways by keeping NZ beautiful and clean will bring in more money in the long run with tourists than what can be created in the short term making money from Salmon Farms. Please look at other countries where salmon farming has failied and had detrimental affects on the eco system. Please be smart and not greedy, once all the fish are gone only then will you realise you can-not eat money.

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

Written Comment No: 0179

Subject	**salmon farm expansion submission**
From	[redacted]
To	aquaculture submissions; berendmos@hotmail.com
Sent	Friday, 10 March 2017 1:05 p.m.
Attachments	<<Mos.pdf>>

see attachment

Written Comment No: 0179

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

Email 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 Berend Mos.

Address

Email [redacted]

Telephone (day) Mobile

√	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 _____
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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 objections:

The Marlborough Sounds should be a marine park, not a marine fish farm.

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

Written Comment No:0584

Subject	**NZ King Salmon Farm Relocation Submission**
From	Ruakaka Farm
To	aquaculture submissions
Sent	Monday, 27 March 2017 2:39 p.m.

To: The Salmon Relocation Advisory Panel

My name is Des Mosdell, I am Team Leader at the Ruakaka Bay Salmon Farm. I have been employed by NZ King Salmon for almost 16 years.
I support the Salmon Farm relocation process being proposed by MPI, because I believe it is a logical step towards providing better environmental, social and economic outcomes.
I believe there will be many benefits by relocating farms from lower water flow sites to higher water flow sites, including:
- Deeper water with faster flowing current means improved fish health and welfare
- It will make for a lower level of effect on the sea bed, which means positive environmental benefits
- Moving some farms away from baches to more remote locations will improve social amenities
- There will be more direct and indirect jobs created if this proposal goes ahead, great news for the top of the south!

NZ King Salmon currently employs more than 300 staff in the Nelson/Marlborough region, plus satellite companies and many local businesses that contract to and support it.The chance to grow and employ more would be great for the regions.
I would not like to be heard by the Advisory Panel.
Regards
Des Mosdell [redacted]

--

Ruakaka Seafarm, QCS Region
M +64 27 2461027 www.kingsalmon.co.nz
New Zealand King Salmon

Written Comments No: 0215

Subject	**New Zealand King Salmon**
From	[redacted]
To	aquaculture submissions
Sent	Wednesday, 15 March 2017 2:33 p.m.

I am writing to support the relocation of salmon farms in the Marlborough Sounds. This would significantly benefit the community and the environment.

Kind Regards,
Paula Muddle

Written Comments No: 0336

Subject	**Aquaculture Farm relocation**
From	Andres Felipe Muller
To	aquaculture submissions
Sent	Monday, 27 March 2017 1:35 PM

Hereby I want to express my support to the relocation of the sites according the new technologies and farmers needs.
From the early days of the aquaculture, sheltered and protected sites were the target of the companies due a lack of cage technology and small level of production.
Nowadays with bigger cages and more robust farming structures the best place for a site location are exposed sites and with plenty of water exchange and currents .
Aquaculture is the future for food production worldwide in terms of conversion, efficiency, water demand and pollution. Aquaculture will need better locations and more exposed areas in order to produce more biomass and better quality.
Sincerely,
Andrés Felipe Müller

Negative

Written Comment No: 0550

W. A. Munro,
[redacted]
Blenheim.
March 24 2017

Salmon Farm Relocation,

Does a residue from
the feeding process caused as upwards
reaction affecting the viability of
current salmon farms to remain
viable?

will the shifting of the farm
only create another dead site
within the future?

What are, or the
proprietors doing, to or intend
doing to bring the current seabed
back to what it was prior to
the introduction of salmon?

Sincerely,
Allen A. Munro

Potential relocation of salmon farms in the Marlborough Sounds.

Darren Murdoch
[redacted]

I have been working for NZKS for over twenty years. This job has provided for myself and son and paid my mortgage. I need this company to keep producing at a high level to keep me in work.
I support the relocation of the 6 farms to high water flow sites because the salmon will be healthier as the water quality will be better. This will give us better quality product which is much easier to work with and we will get more customer orders. I will feel good about feeding the world a top quality product for many years to come with sustainable aquaculture.
This would also create more jobs in the Picton / Nelson areas. It will be good to know that King Salmon will be here in many years to come providing income for the next generation.

Darren Murdoch

16/02/2017

Written Comment No: 0472

Subject	**Fwd:**
From	Charles Park
To	aquaculture submissions
Sent	Monday, 27 March 2017 8:31 a.m.
Attachments	<<scan.pdf>>

Many thanks,
Charlie.

Charlie Park, Tory Channel Regional Manager.

New Zealand King Salmon

M: [redacted] | W: www.kingsalmon.co.nz | A: [redacted] Picton

REGAL

ŌRA KING

---------- Forwarded message ----------
From: **Te Pangu Farm** [redacted]
Date: 27 March 2017 at 20:52
Subject:
To: Charles Park [redacted]

Written Comment No: 0472

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?

Being a staff member of New Zealand King Salmon I support the idea of the relocation of salmon farms

I ~~would~~/**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: Chris Murphy

Organisation/Company: NZKS

Role: Salmon Farmer

Email: [redacted]

Phone [redacted]

Date: 27/03/2017

Written Comment No: 0344

Subject	**Submission against massive salmon farm expansion proposal**
From	Hanneke & Joop
To	aquaculture submissions
Sent	Monday, 27 March 2017 1:03 p.m.
Attachments	<<Peter_Myers_Submission.pdf>>

Hi,
here's the other submission attached, I got my friend to fill in. He doesn't share his email with anyone really and his address is [redacted], Nelson.
It is not so readable on the form

Greetings,
Hanneke

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

Email 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 PETER MYERS

Address [redacted] Nelson

Email

Telephone (day) Mobile

√	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 _____
✓	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 objections:

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

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