

FAQs

What is the written comment deadline and how do I lodge my written comments?

All written comments/feedback must be received by the Ministry for Primary Industries no later than **5pm on Monday 27th March 2017**.

Written comments can be:

- **Emailed to:** aquaculture.submissions@mpi.govt.nz
- **Posted to:**
Salmon Farm Relocation
Ministry for Primary Industries
Private Bag 14
Port Nelson 7042

What are the next steps in the process after consultation closes?

Once consultation closes, there will be an opportunity for people who make written comments to speak to their comments before an independent panel, called the Marlborough Salmon Farm Relocation Advisory Panel. This panel will produce an independent report and recommendations to the Minister for Primary Industries, which he will consider along with a section 32 analysis and advice from agencies before making a decision.

Section 32 requires proposals to be examined for their appropriateness in achieving the purpose of the RMA, and the policies and methods of those proposals to be examined for their efficiency, effectiveness and risk. Expert workshops will also be conducted as required to discuss and resolve any outstanding issues with the available information.

When and where can I speak to my written comments before the Marlborough Salmon Farm Relocation Advisory Panel?

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

Who is working on this project?

This project is led by the Ministry for Primary Industries and builds on recent work with local and central government, industry, scientists and the local community to develop the Benthic Guidelines.

Officials from MPI, and Department of Conservation (DOC) have worked with the Marlborough District Council (MDC) and the Marlborough Salmon Working Group

(Working Group) to identify a limited number of potential relocation sites. The Working Group comprised nominated individuals from MPI, MDC, DOC, Te Tau Ihu Iwi, Aquaculture New Zealand, Marine Farmers Association, New Zealand King Salmon (NZ King Salmon), Guardians of the Sounds, Sounds Advisory Group and the Kenepuru & Central Sounds Residents Association.

How many salmon farms could be potentially relocated?

Up to six existing lower-flow salmon farms in the Marlborough Sounds could be potentially relocated. The lower-flow farms are described below.

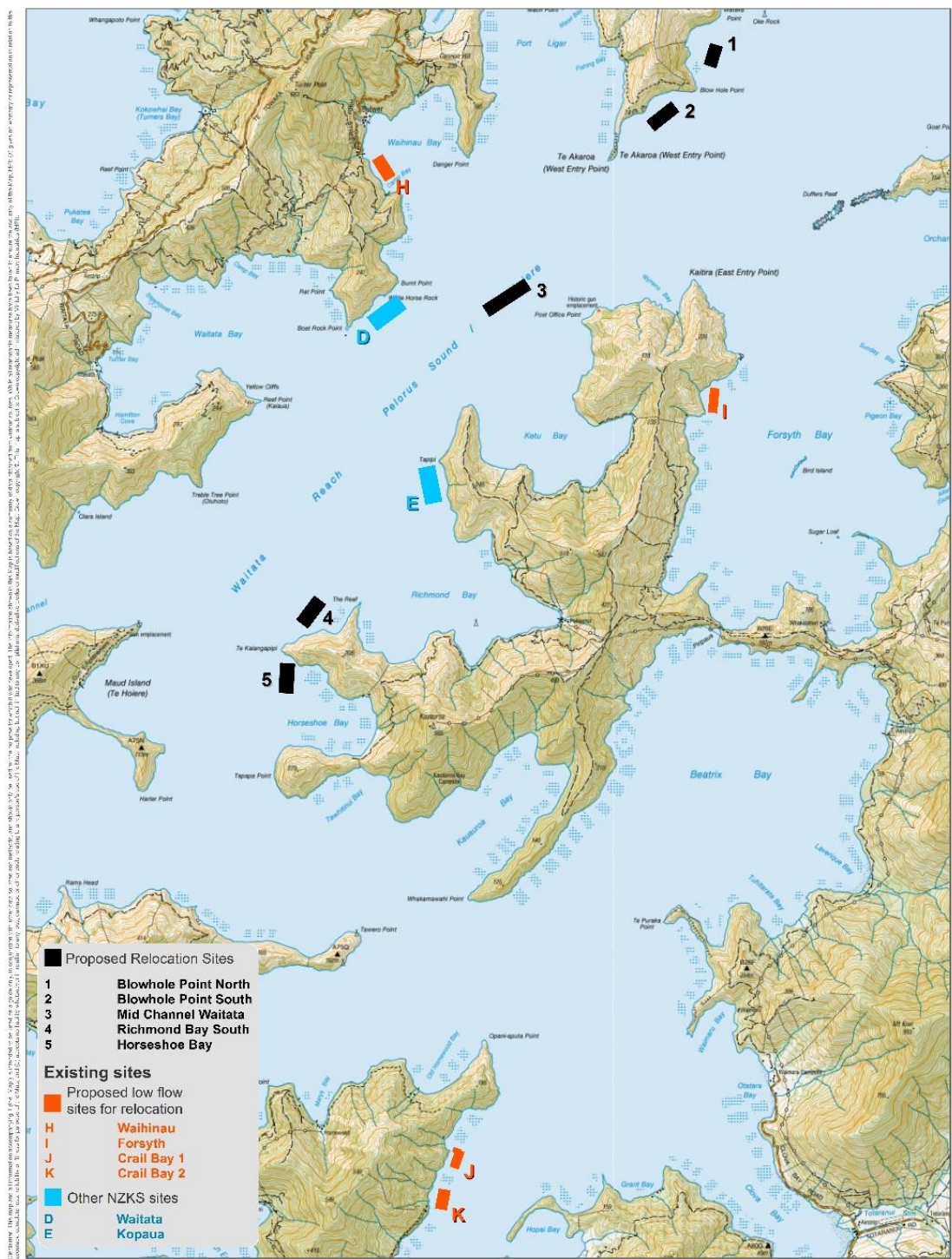
What are the six existing lower-flow farms and potential relocation sites, and where are they located?

Six existing lower-flow farms – RED on the maps		
Name of farm	Location	Surface structure area (hectares)
Ruakaka Bay	Tōtaranui/Queen Charlotte Sound	2
Otanerau	Tōtaranui/Queen Charlotte Sound	2
Waihinu Bay	Te Hoiere/Pelorus Sound	2
Forsyth Bay	Te Hoiere/Pelorus Sound	2
Crail Bay MFL 048	Te Hoiere/Pelorus Sound	0.5
Crail Bay MFL 032	Te Hoiere/Pelorus Sound	0.5

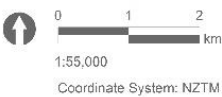
Six higher-flow potential relocation sites – BLACK on the maps		
Name of site	Location	Surface structure area (hectares)
Blowhole Point North	Te Hoiere/Pelorus Sound	1.402
Blowhole Point South	Te Hoiere/Pelorus Sound	1.402
Waitata Mid-channel	Te Hoiere/Pelorus Sound	2.307
Horseshoe Bay	Te Hoiere/Pelorus Sound	1.490
Richmond Bay South	Te Hoiere/Pelorus Sound	0.739
Tio Point	Kura Te Au/ Tory Channel	0.739

An exact proposal for swapping specific lower-flow farms to specific higher-flow sites has not been determined. The decision about how many potential relocation sites will proceed will not be made until after public consultation on the proposal.

Note that existing salmon farms which are NOT being considered for relocation appear in BLUE on the maps.



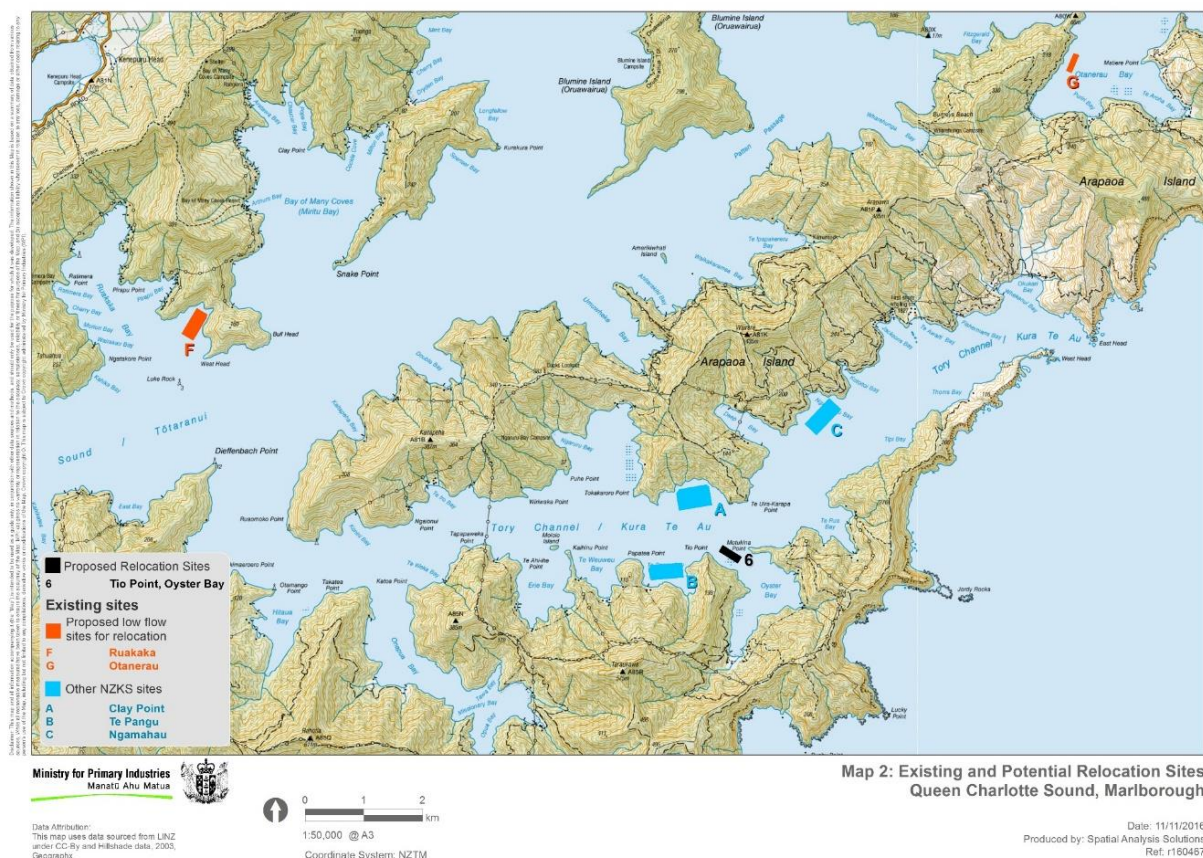
Ministry for Primary Industries
 Manaŋi Ahu Matua



**Map 1: Existing and Potential Relocation Sites
 Pelorus Sound, Marlborough**

Data Attribution:
 This map uses data sourced from LINZ
 under CC-BY and Hillshade data, 2003.
 Geographic:

Date: 11/11/2016
 Produced by: Spatial Analysis Solutions
 Ref: r160467



How were the relocation sites selected?

In 2012, the Ministry for Primary Industries began a process to identify potential aquaculture space (finfish, mussels and oysters) in the Marlborough Sounds to deliver the Crown's Treaty of Waitangi aquaculture obligations to iwi. An initial list of over 100 potential sites was identified, but subsequently refined to a very small number of suitable sites following constraint mapping using environmental, bio-physical, hydrological, fisheries and RMA information.

This process demonstrated that:

- opportunities for salmon farm relocation are limited to nine higher-flow sites, which were considered by the Working Group, and
- opportunities for future salmon growth are highly constrained.

This proposal was initiated in early 2015 after King Salmon approached the government and Marlborough District Council expressing a desire to relocate its existing lower-flow farms to higher-flow sites in order for all farms to comply with the Benthic Guidelines.

In mid-2016, the Ministry for Primary Industries, supported by the Marlborough District Council, convened the Marlborough Salmon Working Group which considered options (including the small list of relocation sites) to implement the Benthic Guidelines, so that better environmental outcomes for salmon farming in Marlborough could be realised in the medium term.

The group comprised nominated individuals from the Ministry for Primary Industries, Department of Conservation, Marlborough District Council, Te Tau Ihu Forum, NZ King Salmon, Aquaculture New Zealand, and local community interest groups. The group considered a range of options, including reducing stocking levels (and associated feed levels) at existing lower-flow farms, waste capture, seabed remediation, improving feed efficiency, land-based aquaculture, offshore farming, and relocation (including potential relocation sites).

As part of the Working Group process, three of these nine sites were eliminated. The Working Group agreed that three sites were appropriate to proceed to public consultation, while there were divergent views on whether the remaining three should also proceed to public consultation (Blowhole Point south, Blowhole Point north and Mid-channel Waitata). To help the public, their report outlining a range of views has been made available on the Ministry for Primary Industries' website here: <http://www.mpi.govt.nz/news-and-resources/consultations>.

Based on this work, an Assessment of Environmental Effects for each of the six potential sites has been developed and is also available on the website website: <http://www.mpi.govt.nz/news-and-resources/consultations>.

Why do the farms need to be relocated?

Based on our growing understanding of salmon farming, sites with higher water flows have reduced environmental effects on the seabed compared to lower-flow sites. Six of the existing 11 salmon farming sites in the Marlborough Sounds have lower flows than are ideal for modern salmon farming practices.

To comply with the Benthic Guidelines, these farms would have to reduce their feed levels. This would mean lower production, which would in turn reduce the economic benefits and have potential adverse social effects through job losses. The potential relocation sites are more suitable for farming salmon because they have higher current flows and deeper waters. Relocation could also deliver social and cultural benefits, for example, by moving the farms away from residential dwellings and areas of higher public use.

What assessments have been undertaken at the potential relocation sites?

Our knowledge base on salmon farm management has improved over recent years. In 2014 local and central government, industry, scientists and the local community worked together to develop *Best Management Practice Guidelines for salmon farming in the Marlborough Sounds: Benthic environmental quality standards and monitoring protocols* (Benthic Guidelines). The Benthic Guidelines ensure good management of the effects of salmon farming on the seabed in the Marlborough Sounds. They provide clear and consistent requirements for independently conducted annual seabed monitoring and management of existing salmon farms.

New hydrodynamic models for the Marlborough Sounds, co-funded by Marlborough District Council and government, now provide the best available information to understand changes in water quality and water movement patterns.

In addition to this science, each potential site considered for relocation has undergone a comprehensive Assessment of Environmental Effects. The list of research is provided in the table below and are available to view or download from the Ministry for Primary Industries website: <http://www.mpi.govt.nz/news-and-resources/consultations>.

Research investigation	Provider	Peer review*
Navigation	Navigatus Consulting Ltd	
Landscape and natural character	Hudson Associates Landscape Architects	Drakeford Williams Ltd
Recreation and Tourism	TRC Tourism Ltd	
Seabirds	NIWA	DOC
Marine mammals	Cawthron and Associates	DOC
Pelagic fish	Statfishatics	
Benthic	NIWA Cawthron Institute (Tio Point site)	Catriona McLeod – University of Tasmania
Water quality	NIWA	Cawthron Institute
Discharges (Cu/Zn, greywater)	Cawthron Institute	
Disease	DigsFish	
Biosecurity	Cawthron Institute	
Underwater lighting	Cawthron Institute	
Noise	Marshall Day Acoustics	
Cultural impact assessment	Maximize Consulting Ltd Ngati Koata	not applicable
Heritage impacts	HistoryWorks	
Social impacts	Taylor Baines & Associates	Quigley Watts Ltd
Economic analysis	Pricewaterhouse Cooper	Ernst & Young
Operations	NZ King Salmon	not applicable
Engineering	OCEL	not applicable

*Note that in addition to the formal peer reviews listed, review was undertaken by appropriate crown staff and/or contractors of all research. These review comments were addressed by providers and the reports were modified accordingly.

What are the benefits?

Better sustainability outcomes

- Farms will meet the Benthic Guidelines.
- Reduced seafloor effects directly below the salmon farm compared to lower-flow areas.

“Professor Kenneth Black of the Scottish Association of Marine Sciences, reported that higher-flow sites are better for growing healthy salmon, and reducing environmental effects in the Marlborough Sounds.”

- Healthier salmon are more resilient to disease and increasing sea temperatures.
- Opportunities for improved management of biosecurity risks.

- Improved environmental monitoring and adaptive management.

Potential better social outcomes

- Farms moved out of areas with high recreational use and amenity. For example, there will no longer be any farms in Queen Charlotte Sound which is a high use tourism area.
- Improved visual effects from new low profile structures in colours that blend into the background.
- Reduced noise, lighting, and odour effects.
- The farms will be further away from populated bays, for example the number of dwellings with direct line of sight and that are within 1km of the farms will decrease from 21 to 3 in Queen Charlotte/Tory Channel. In Pelorus Sound, there would be no residential dwellings with direct line of sight and within 1km of a salmon farm.

And improved economic outcomes

- Up to \$39 million annually to regional GDP.
- Up to 511 Full Time Equivalent (FTE) jobs.

Economic gains would occur over about 10 to 15 years as the sites are relocated and then developed in stages. These values (\$39 million and 511 FTEs) are based on all six farms relocating.

Note that the decision about how many potential relocation sites will proceed will not be made until after public consultation on the proposal.

What is the situation with recent salmon mortality events?

MPI was notified in early 2015 of higher than usual numbers of fish deaths on some Marlborough salmon farms. It is likely the increased death rates are due to a range of factors. These may include environmental factors (like water temperature), management practices at affected farms, and exposure of salmon to bacterial infection.

MPI has enacted some legal controls on salmon farming activities in the Marlborough Sounds to help prevent the spread of one particular bacterium outside the two affected Sounds.

More details can be found here: <http://www.mpi.govt.nz/document-vault/12004>

How will on-farm biosecurity be managed or improved?

The salmon farm relocation proposal will continue to ensure effective on-farm biosecurity management in the Marlborough Sounds.

Moving farms to deeper, higher flow sites combined with the implementation of effective on-farm biosecurity management would:

- Decrease the likelihood of biological risks potentially impacting farm operations, and adverse effects on the aquatic environment from pests and diseases,
- Improve salmon health and resilience to warming sea temperatures from climate change.

A resource consent condition for each farm would require NZ King Salmon to develop a Biosecurity Management Plan in consultation with MPI biosecurity experts. To ensure ongoing compliance the salmon farms would be independently audited on an annual basis.

The Biosecurity Act 1993 requires early notification and other obligations in relation to the handling of pest species and disease agents of concern. In addition, Aquaculture New Zealand is developing a salmon industry standard to provide effective and coordinated biosecurity management across New Zealand.

To support the aquaculture sectors growth goal, MPI have recently published a set of on-farm biosecurity guidance material.

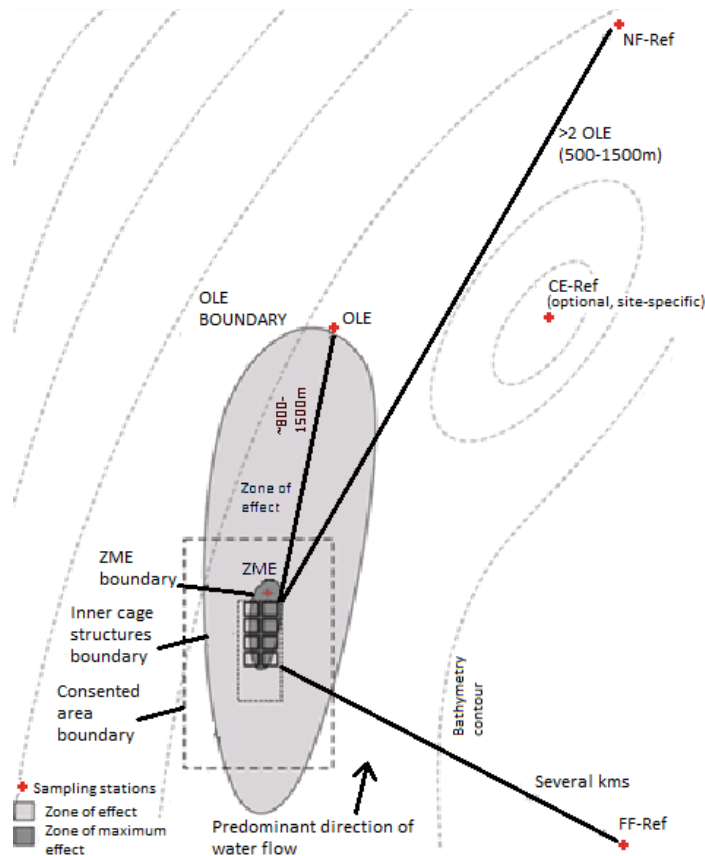
The Aquaculture Biosecurity Handbook is available at: <http://www.mpi.govt.nz/document-vault/13293> and the Technical Reference Document is available at: <http://www.mpi.govt.nz/document-vault/13287>

What are the Benthic Guidelines and what is ES5?

In 2014, local and central government, industry, scientists and the local community worked together to develop the Best Management Practice guidelines for salmon farming in the Marlborough Sounds: Benthic environmental quality standards and monitoring protocols (Benthic Guidelines).

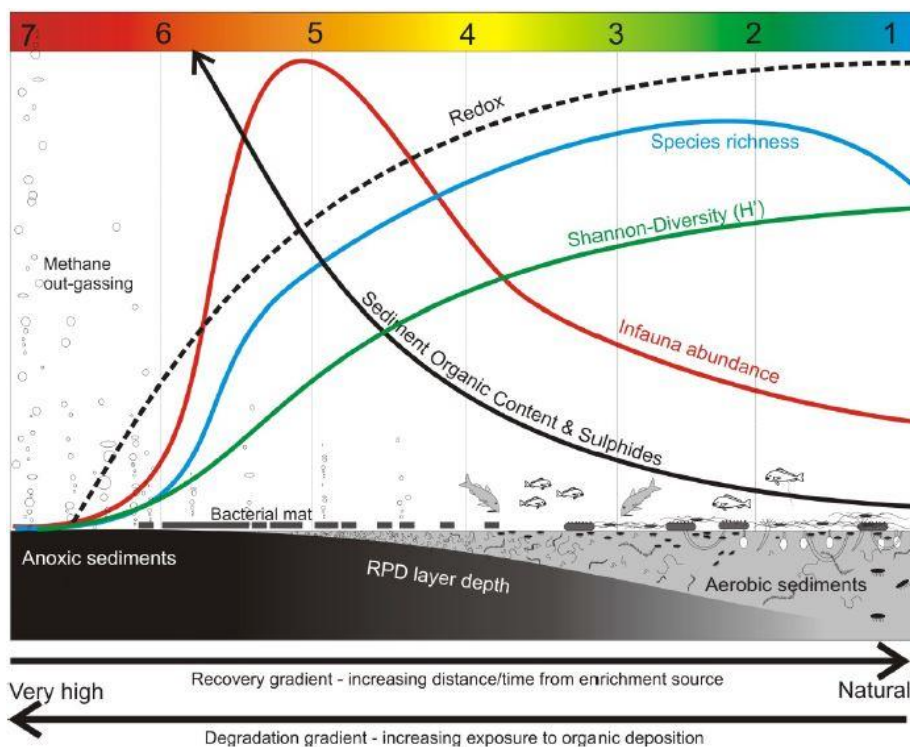
These provide clear and consistent requirements for independent benthic (seabed) monitoring and management responses. They specify environmental quality standards that provide environmental “bottom lines” to assess the effects of salmon farming on seabed enrichment.

A key element of the Benthic Guidelines is the use of an Enrichment Scale of 5 (ES5) in the Zone of Maximum Effect (ZME) and less than Enrichment Scale 3 (ES3) in the Outer Limit of Effect (OLE) to set a maximum permitted level of enrichment (‘bottom line’) beneath a salmon farm.



ZME = zone of maximum effect, OLE = outer limit of effects, NF-Ref = near-field reference, FF=Ref = far-field reference.

The guidelines set out a framework for monitoring effects close to farms and further away, but where you might still expect to see reduced effects from marine farming, as seen in the diagram below from the Benthic Guidelines. This diagram is a stylised depiction of a typical enrichment gradient and shows generally understood responses in commonly measured environmental variables. The gradient spans from natural or pristine conditions on the right (ES = 1.0) to highly enriched azoic conditions on the left (ES = 7.0).



How long will it take to make the regulations?

Depending on the Minister's decisions and the timeframes within which he makes them, the regulations would be finalised sometime within 2017.

How long would relocation take?

How long relocation takes depends on when New Zealand King Salmon applies for resource consents. If the resource consents are issued, MPI would then be required to make an aquaculture decision under the Fisheries Act 1996 to determine whether the proposed activity would have any undue adverse effects on commercial, recreational or customary fishing.

Farms at the lower flow sites would be removed before farms would go into the water at the relocation sites. Economic benefits are expected to occur over about 10 to 15 years as relocation occurs and the farms are developed in stages.

How does this process fit in with MDC's planning work?

If the relocation proposal proceeds it would amend the Marlborough Sounds Resource Management Plan, which is the current operative plan. Applications for coastal permits to establish farms at the relocation sites would be made under the amended Marlborough Sounds Resource Management Plan.

Marlborough District Council notified the Proposed Marlborough Environment Plan (MEP) for submissions in June 2016. The MEP did not include the provisions relating to marine farming, which are still subject to review.

The Council intends to re-commence the review of marine farming provisions in February 2017. If the relocation proposal proceeds, it will inform this review process with respect to

planning for salmon farming in the Marlborough Sounds. MPI will work with Marlborough District Council to ensure that any sites and rules agreed for relocation are included in the provisions relating to marine farming in the MEP.

What is the regulatory option currently being considered by central government?

Central government is currently considering using the aquaculture regulation-making power (Section 360A under the Resource Management Act 1991) for the proposal to amend the Marlborough Sounds Resource Management Plan to enable the relocation of up to six existing lower flow salmon farms in the Marlborough Sounds.

Why is government supporting aquaculture?

Aquaculture represents one of the primary industries of the future and will continue to command more and more of the global seafood market. Government has a role overseeing the whole RMA regime, to work with councils, Māori and the community to set national direction, to approve RMA plans, and to work with councils on opportunities for regional growth and environmental protection. This proposal will only be applying to the company NZ King Salmon as they are the only company currently farming salmon in the Marlborough Sounds.

The Government is committed to building a strong aquaculture industry as part of its aquaculture policy as set out in the following documents: Natural Resource Business Growth Agenda (2015), New Zealand Coastal Policy Statement (2010), and the Aquaculture Strategy (2012). The policy is as follows:

- i. To recognise the significant existing and potential contribution of aquaculture to the social, economic and cultural well-being of people and communities by:
 - a. Including in regional policy statements and regional coastal plans provision for aquaculture activities in appropriate places in the coastal environment, recognising that relevant considerations may include:
 - i. The need for high water quality for aquaculture activities; and
 - ii. The need for land-based facilities associated with marine farming;
 - b. Taking account of the social and economic benefits of aquaculture, including any available assessments of national and regional economic benefits; and
 - c. Ensuring that development in the coastal environment does not make water quality unfit for aquaculture activities in areas approved for the purpose;
- ii. To support well-planned and sustainable aquaculture growth;
- iii. To improve productivity while reducing environmental impact; and
- iv. To support aquaculture development regionally.

What will happen to the current farms that are relocated?

The vacated sites will no longer be used to farm salmon and all structures will be removed. These costs will be incurred by NZ King Salmon.

Under this proposal, the majority of the sites will be prohibited for future aquaculture, while the Crail Bay MFL032 site will only be prohibited to finfish farming. This is because there is an existing consent to farm mussels at this site which is owned by a consent holder other than NZ King Salmon.

Will there be any long-term environmental effects from the vacated sites?

The reduction of most environmental effects (including water quality) is expected to be immediate. Functional recovery can occur within five years of farm being removed, but significant recovery will occur in the first few years (Keeley et al., 2014).

How does this process relate to the Maori commercial aquaculture claims settlement?

In mid-2015, eight iwi of Te Tau Ihu signed a regional agreement with the Crown under the Maori Commercial Aquaculture Claims Settlement Act 2004, and accepted a settlement that did not include space for salmon. If some or all of the farms are relocated, it may trigger a top-up of this settlement.

Is the government taking into account iwi views?

Yes, the law requires the Minister consult with iwi authorities. In addition, the government has been meeting with Te Tau Ihu Forum about the project and will continue to do so during public consultation. The Marlborough Salmon Farm Relocation Advisory Panel will also meet with iwi authorities to hear their views and will provide an independent report to the Minister for Primary Industries.

Will salmon farms be affected by the proposed Marlborough Sounds Recreational Fishing Park?

No. The Government is currently consulting on a proposed new approach to marine protection in New Zealand. Part of this approach is a proposal to create a Marlborough Sounds Recreational Fishing Park that will prohibit specific types of commercial finfishing. Marine farming will not be affected by the creation of this recreational fishing park.

Why isn't there a coastal occupancy charge?

The Marlborough District Council are proposing to roll out a coastal occupancy charge as part of the Proposed Marlborough Environment Plan. NZ King Salmon is supportive of this.

The rectangles for many of the salmon farm sites on the maps look very large - are they really taking up all that space?

The rectangles show the approximate boundaries of the consented area within which salmon farms are placed. The farm surface structures cover a smaller portion of this area, and the total area of surface structures will not be greater than the existing farm sites.

However, as the relocation sites have higher current flows, the mooring lines may need to be anchored at greater lengths or angles to maintain the farm's position. This means the consented area below the surface may also be greater, and this is depicted by the larger rectangles.