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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: 0475

Subject	Salmon Farms in the Marlborough Sounds
From	Judith Adams
To	aquaculture submissions
Sent	Monday, 27 March 2017 8:31 a.m.
Attachments	<<Submission EDS.docx>>

Good morning,

Please include my submission with regard to salmon farming in the Marlborough Sounds.

Kind regards, Judith Adams

This email has been filtered by SMX. For more information visit smxemail.com

Potential Relocation of Salmon Farms in the Marlborough Sounds

My details

NAME: Judith Adams

CONTACT PERSON: Judith Adams

POSTAL ADDRESS: [REDACTED] Blenheim

EMAIL: [REDACTED]

DAYTIME PHONE:

MOBILE:

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

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

Comments sent to: aquaculture.submissions@mpi.govt.nz

DATE: 27 March 2017

I OPPOSE the relocation proposal for the following reasons:

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

Written Comments No: 0475

	<p>years before any more space is considered. [consistent with BOI Condition of Consent 44a]</p> <ul style="list-style-type: none"> • This especially applies to Tio Point, which would be the fourth salmon farm in close proximity in Tory Channel. • In the meantime reduce the feed and stocking rates at the low flow sites to meet the Benthic Guidelines.
3. Nitrogen pollution	<ul style="list-style-type: none"> • We dispute the accuracy of Minister's statement: "This proposal is about making better use of existing aquaculture space. There is no proposed increase in the total surface structure area used for salmon farming in the Marlborough Sounds," – Nathan Guy, Minister of Aquaculture. • The proposed relocation sites are not "existing aquaculture space". They are prohibited to aquaculture. • While farm surface area may remain about the same, there is a proposed five-fold increase in fish feed to 24,600T a year. • With more feed and more fish, the amount of nitrogen pollution discharged into the Sounds through salmon faeces would also increase. The high-flow farms would be discharging the equivalent of the nitrogen in sewage from a city the size of Christchurch, straight into the sea.¹ • Residents must meet strict obligations to keep waste out of the enclosed waters of the Sounds. Yet this proposal would allow the untreated discharge of polluting nutrients from six new salmon farms. • As a land-based comparison of low flow and high flow sites, it is not OK for a dairy farmer who has been pulled up for discharging effluent into a small stream to resolve the issue by increasing his herd and discharging to a faster river.
4. Offshore Alternatives	<ul style="list-style-type: none"> • The NZKS Supreme Court decision ruled there was an obligation to consider alternatives under the NZ Coastal Policy Statement and Section 32 of the RMA. "Particularly where the applicant for a plan change is seeking exclusive use of a public resource for private gain." [SC 172-173] • Having salmon farms offshore (open ocean aquaculture) rather than in the confines of the Marlborough Sounds would dilute the pollution and remove the conflict with other users. This approach is being used in countries such as Norway. • Offshore alternatives are barely mentioned in this proposal. NZKS claims it would be achievable in 10 years but was too expensive and not yet proven. There is no information about what is happening in other countries and no cost-benefit analysis about off-shore alternatives. • Rather than pushing this relocation proposal for areas prohibited to aquaculture, MPI and the industry should invest in research to expedite offshore farming as a future-proofed alternative.

¹ BOI [par 379] Nitrogen equivalent calculations

Written Comments No: 0475

5. King shag	<ul style="list-style-type: none"> • Policy 11 of the NZ Coastal Policy Statement calls for protection of indigenous species in the coastal environment. • The NZ King Shag is classified as nationally endangered and is found only in the Marlborough Sounds. It is a taonga for Ngati Kuia and Ngati Koata. • King Shag are sensitive to disturbance when breeding, roosting and feeding. Duffers Reef to the Waitata Reach, where five new farms are proposed, are key areas for these activities. • The threat to King Shag was a factor in the BOI restricting the number of new farms in the Waitata Reach to two in its 2013 decision [BOI 1252]. Yet this latest proposal is seeking another five farms in the King Shag foraging area.
6. Landscape and Cumulative effects	<ul style="list-style-type: none"> • This proposal will degrade the Outstanding Natural Landscapes and High Natural Character values of the Waitata Reach. ² • The Board of Inquiry decision identified the threshold number of salmon farms for Waitata Reach as TWO – Waitata and Richmond – and turned down three others because of the cumulative effects on Landscape, Natural Character, King shag feeding and Tangata Whenua values. [BOI 1252] • NZKS and MPI have ignored this ruling, which was arrived at after a long and considered judicial process. Instead they have joined forces and put forward this relocation proposal for FIVE more farms in the Waitata Reach. None of these farms can be justified.

Further comment:

Fully support no more farming in the Sounds.

In conclusion:

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

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

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

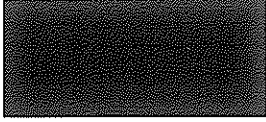
Written Comments No: 0456

Subject	Submission form for Graeme Aldridge
From	<u>Fish Performance</u>
To	aquaculture submissions
Sent	Monday, 27 March 2017 9:21 a.m.
Attachments	<<Farm Relocation Submssion.docx>>

Good Morning
F.Y.I
Regards
Graeme Aldridge

Written Comments No: 0456

Graeme Aldridge



Picton



To whom it may concern.

Re: Salmon Farm Relocation

My name is Graeme Aldridge and i would like to support the Salmon farm relocations from the old sites to the new sites.

Reasons are that the new sites will help spread and waste from the fish than it settling on the sea bed on the old sites. A good example is my Grandfather who was a whaler at Perano use to say that the old site (unknown exactly where but around defenbach) where they used to harvest the whales it became really thick with by product but when they moved to Teawiti it was dispersed a lot better (along with the sharks feeding) and moved a lot better in the tide.

I also support the movement as it will be the best for the environment but would also like to see NZKS still monitor the old sites for a certain amount of years to show that they are being pro active and hope to show that the old sites are improving. This may be also a good for more job opportunities for anyone interested in Aquaculture

I would NOT like to represent myself at any hearings.

Thank you

Regards

Graeme Aldridge

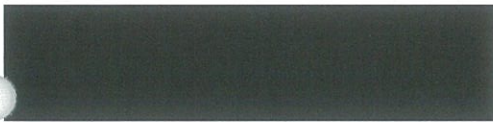
Subject	Fwd: New Zealand King Salmon
From	[REDACTED]
To	aquaculture submissions
Sent	Thursday, 23 March 2017 2:02 PM

Written Comments No: 0311

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----- Forwarded message -----

From: **Daniel Allen** [REDACTED]
Date: Thu, Mar 23, 2017 at 1:59 PM
Subject: New Zealand King Salmon
To: aquaculture.submissions@mpi.govt.nz

Salmon Farm Relocation
Ministry for Primary Industries
Private Bag 14
Port Nelson

Written Comments No: 0311

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 for you as a partner of King Salmon?

How will this affect your company?

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

This will mean that NZKS will continue to produce a higher level of product which will ensure that they will meet our services to market their efforts.

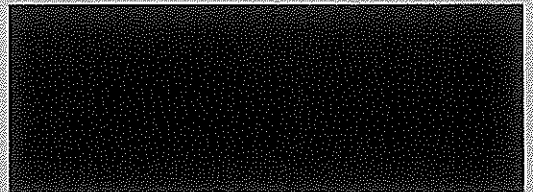
Name:

Date:

Daniel Allen
22/3/17

Email:

Phone:



Written Comment No: 0599

Subject	Salmon Farm Relocation
From	Trevor Allen
To	aquaculture submissions
Sent	Tuesday, 14 March 2017 2:28 p.m.

To: The Salmon Relocation Advisory Panel

My name is Trevor Allen and I have been working for New Zealand King Salmon based in Nelson as Credit Controller for the past 14 years.

I would like to register my full support for the potential salmon relocation process being proposed by MPI because I believe the salmon relocation of these farms will provide for a far better environmental, social and economic outcome for all.

By moving these farms to sites where the water is deeper and has higher flows would provide for a more sustainable, productive, and resilient industry without increasing the total amount of surface space occupied by salmon farm structures. It will also have a lower level of effect on the seabed which will have positive environmental benefits.

In my view the proposed relocation of these farms will increase the productivity of natural resources while reducing environmental effects and moving some of these farms away from beaches to more remote locations will improve social amenities.

I can see that 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. It will also help secure the jobs of the current workforce at New Zealand King Salmon and also the flow on effect for suppliers to New Zealand King Salmon.

I do not wish to be heard by the hearings panel

Kind regards

Trevor

Trevor Allen, Group Credit Controller

 New Zealand King Salmon



Tahunanui, 7011



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Subject	Supplier Salmon Farm Relocation template submission (1).docx
From	[REDACTED]
To	aquaculture submissions
Sent	Tuesday, 7 March 2017 4:32 p.m.
Attachments	<<Supplier Salmon Farm Relocation template submission (1).docx>>

Regards

Paul Ladbroke | Branch Manager | Bays Laundry | AlSCO NZ
[REDACTED] Nelson 7010, Nelson

DDI: [REDACTED]

| www.alsco.co.nz



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Written Comment No: 0158

Salmon Farm Relocation
Ministry for Primary Industries
Private Bag 14
Port Nelson

aquaculture.submissions@mpi.govt.nz

To: The Salmon Relocation Advisory Panel

My name is Paul Ladbroke I am Branch Manager for Alsco and Bays Laundry looking after the top of the south from Kaikoura through to Westport.

I definitely support the proposed salmon relocation process being proposed because all the research I've seen tells me that the salmon farm relocation will provide for better environmental, social and economic outcomes.

I am particularly interested in the development of further industry as there will potentially 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.

What this could mean for Alsco and Bays Laundry as a partner of King Salmon is the confidence to develop stronger and more strategic relationships with NZ King Salmon and their supply and distribution network etc.

The effect this could have on our company is the confidence from our shareholders to invest and stability for our employees, families and the community.

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

Name: Paul Ladbroke

Email: [REDACTED]

Date: 7th March 2017

Phone: [REDACTED]

Written Comment No: 0430

Subject	Salmon Farm Relocation Advisory Panel- Support letter
From	joanna.davis@kingsalmon.co.nz
To	aquaculture submissions
Sent	Monday, 27 March 2017 11:00 a.m.
Attachments	<<MPI Submission Salmon Farm Relocation RubenAlvarez.pdf>>

To: The Salmon Relocation Advisory Panel,

Please find attached document in **support** of the proposed salmon farm relocation.

Many thanks
Ruben Alvarez

Ruben Alvarez, COO



| W: www.kingsalmon.co.nz | Tahunanui, 7011



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Written Comment No: 0430

Picton 7220

Salmon Farm Relocation
Ministry for Primary Industries
Private Bag 14
Port Nelson

17th March 2017

To: The Salmon Relocation Advisory Panel,

I would like to express my **strong support** for the potential salmon farm relocation process that is being proposed by MPI. My name is Ruben Alvarez and I joined the New Zealand King Salmon team in March 2014 as Chief Operating Officer (COO). I am currently a resident of New Zealand and I plan to apply for citizenship in the future. I moved to New Zealand with my wife and two children, who are now very well adapted to the kiwi way of life. My eldest child has been studying at a New Zealand university for three years and my son will aim to do the same in the future.

I moved to New Zealand because I grew up believing that NZ is a green, safe place for my family to grow and I strongly believe that we can successfully maintain this view around the world if the farm relocation goes ahead.

As COO to NZKS I truly believe that the salmon farm relocation will provide far better environmental, social and economic outcomes.

New Zealand has the luxury of the unique King salmon species that we can grow locally where the rest of the world has given up because it is so complex. More than 20 years ago the pioneers of NZKS had the vision to develop a proper genetic program to improve the quality of the King Salmon species, now after 20 years of hard work we can say that we have a distinctive breed, unique in the world. On top of that we have the privilege of being able to sell this high quality fish within New Zealand and to the rest of the world. The main limiting factor of aquaculture in New Zealand is water space to grow these fish, this is where other countries have been allowed to flourish.

I have seen from my 30 years experience working in aquaculture around the world (Norway, Scotland, Saudi Arabia) as well as within NZKS that relocating farms from lower water flow sites to higher water flows sites significantly improves the performance of fish. The fish

Written Comment No: 0430

experience lower water temperatures and higher oxygen flows which is crucial for the King salmon species of fish which are some of the hardest fish to grow. With lower temperatures the fish are more comfortable through the summer months and continue to feed effectively.

We have scientific data taken by a third party scientific institute to state that we do not create a significant footprint with our farming activities. In addition the CO² footprint in salmon culture 12kg/CO² per kilo fish is lower for instance than Lamb production 40kg CO² per kilo lamb and beef production 29kg CO² per kilo. Our farming operations are limited to less than 0.17km² in total. With the relocation proposal we are not going to increase the existing total square kilometres that we already have. I don't know of any other animal production activity that can provide such a high efficiency way to produce animal protein by square kilometre.

If you were to use the countries where I have previously worked and gained experience as examples of successful aquaculture - there is no indication that they are killing their own country. Norway - (widely considered to be a 'green' country) grows 1,400,000+ tons of salmon per year in comparison to total New Zealand production of 13,000 tons. Norway is still continuing to grow, and is still successful with a great balance between other businesses that depend on and use the sea. They balance the strict environmental and recreation requirements and the economic benefit particularly well. I believe that the salmon farm relocation would help New Zealand achieve this balance.

I lived in Norway for two years and during my time there I did not see any issue between the significantly bigger salmon industry (1 Million tons per year) and tourism. The number of tourists visiting the area is similar to New Zealand at 3.2 - 3.6 million (innovajonne.no and statsgov.nz), there is no indication of conflict between both parties. Norwegian citizens feel proud about both their salmon production and their landscape successfully working together. They have a vast number of salmon pens floating in the fjords without much opposition. The level of opposition in New Zealand is in my opinion unjust in comparison to other countries.

Another successful example of aquaculture growth is the Faroe Islands who have limited resources yet they took the ocean and saw the salmon industry as a potential opportunity to create permanent jobs and produce 62,000+ tons per year. They have strict environmental parameters, much like New Zealand which they maintain yet produce enough salmon for a significant economic outcome.

When you assess how the world will attempt to accommodate 1 billion more people in 20 years there are significant issues we face. Since 1986 the fishing industry has remained flat at 90 million tons per year. (The state of World fisheries and Aquaculture, FAO, 2016) We cannot continue to drain the oceans of their natural resources.

Written Comment No: 0430

The world will without doubt move into aquaculture in the future, 170 million tons as per "The state of World fisheries and Aquaculture", FAO, 2016, where 50 million tons are finfish. NZ can either join now or later. Aquaculture is going to produce the protein and food that the world desperately needs. Just like Norway and the Faroe islands, New Zealand has many clear rules for sustainable aquaculture which we intend to follow if the relocation is permitted. Aquaculture has the potential to deliver high-yield, healthy protein at environmental and economic efficiency levels which are difficult to match in land-based agricultural situations.

We are a fortunate country in that we are surrounded by ocean which is a great resource and opportunity. We are using just **0.17km² out of 10,458km²** of inland water and oceanic areas in the Marlborough region (Marlborough Council information) which is equal to less than **0.0016%**. I strongly believe that we have an opportunity to be more efficient and create extra grow benefitting New Zealand, stakeholders including the company itself, environmental groups, the community, and shareholders.

If we become more efficient and create extra growth, we will create additional well paid, permanent jobs and indirect jobs for the region. Therefore supporting local families and local businesses for the future. If the Marlborough region became as significant in salmon farming as it is in winemaking the region's desirability to tourists would have far greater depth. Marlborough needs more iconic reasons to visit year round. Without local businesses that have an ability to grow, NZ's regional communities - such as Marlborough - will decline in population and prosperity.

To run a business like this, we need to have good aquaculture areas in different locations. At present we only have two areas which can be limiting. The new farms would give us more flexibility and biosecurity control so that we have fish all in and all out and better conditions for our fish. We would become more stable in terms of volume and size of fish in the market so that NZ becomes a constant and reliable supplier across the world. The farms would also be relocated in an area with less baches.

In summary, moving the farms from their current locations, to the proposed new sites, will result in improved fish welfare and health, in addition to a reduced environmental impact and significant economic gains for the company as well as the region. I cannot see a negative to this proposal.

Yours faithfully

Ruben Alvarez

Subject	Salmon Farm Relocation submission
From	[REDACTED]
To	aquaculture submissions
Sent	Tuesday, 21 March 2017 11:55 a.m.
Attachments	<<Salmon Farm Relocation Submission_ Michael Anderson.docx>>

Dear Sir / Madam

Please find attached my submission for relocation of NZ King Salmon Farms in the Marlborough Sounds.

Kind regards,

Michael Anderson

--

Mike Anderson, *Aquaculture Training Coordinator*



M: [REDACTED] **W:** www.kingsalmon.co.nz



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Salmon Farm Relocation

Ministry for Primary Industries

Private Bag 14

Port Nelson

aquaculture.submissions@mpi.govt.nz

To: The Salmon Relocation Advisory Panel

My name is Michael Anderson. I work for New Zealand King Salmon Company Ltd. at Tentburn Hatchery, Southbridge, Canterbury. My job role is Aquaculture Training Coordinator and I have been with the company for 17 years.

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.

On a personal level, NZKS has provided me with a steady career over the past 17 years, with excellent training opportunities, job role advancement, a safe workplace environment and a high calibre of work mates around me. I 100% support the relocation of sea farms as the company looks to grow and improve the quality of both the fish and surrounding environment.

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

Name: *Michael David Anderson*

Date: *21st March 2017*

E:

Phone:

Written Comment No:0496

Subject	3 MEC salmon farm relocation proposal main points for circulation mar 23
From	<u>Peter Anderson</u>
To	aquaculture submissions
Sent	Sunday, 26 March 2017 3:47 p.m.
Attachments	<<3 MEC salmon farm relocation proposal main points for circulation mar 23.docx>>

Potential Relocation of Salmon Farms in the Marlborough Sounds

COMMENTS FORM

Comments closes 5pm, 27 March, 2017

Your details

NAME: Peter Anderson

ORGANISATION (if applicable):

CONTACT PERSON: Peter Anderson

POSTAL ADDRESS: [REDACTED] Blenheim

EMAIL: [REDACTED]

DAYTIME PHONE: [REDACTED]

MOBILE: [REDACTED]

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

Comments sent to: aquaculture.submissions@mpi.govt.nz

DATE: 26 March 2017

I OPPOSE the relocation proposal for the following reasons:

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

	<p>“This proposal is about making better use of existing aquaculture space. There is no proposed increase in the total surface structure area used for salmon farming in the Marlborough Sounds,” – Nathan Guy, Minister of Aquaculture.</p> <ul style="list-style-type: none"> • The proposed relocation sites are not “existing aquaculture space”. They are prohibited to aquaculture. • While farm surface area may remain about the same, there is a proposed five-fold increase in fish feed to 24,600T a year. • With more feed and more fish, the amount of nitrogen pollution discharged into the Sounds through salmon faeces would also increase. The high-flow farms would be discharging the equivalent of the nitrogen in sewage from a city the size of Christchurch, straight into the sea.¹ • Residents must meet strict obligations to keep waste out of the enclosed waters of the Sounds. Yet this proposal would allow the untreated discharge of polluting nutrients from six new salmon farms. • As a land-based comparison of low flow and high flow sites, it is not OK for a dairy farmer who has been pulled up for discharging effluent into a small stream to resolve the issue by increasing his herd and discharging to a faster river.
4. Offshore Alternatives	<ul style="list-style-type: none"> • The NZKS Supreme Court decision ruled there was an obligation to consider alternatives under the NZ Coastal Policy Statement and Section 32 of the RMA. “Particularly where the applicant for a plan change is seeking exclusive use of a public resource for private gain.” [SC 172-173] • Having salmon farms offshore (open ocean aquaculture) rather than in the confines of the Marlborough Sounds would dilute the pollution and remove the conflict with other users. This approach is being used in countries such as Norway. • Offshore alternatives are barely mentioned in this proposal. NZKS claims it would be achievable in 10

¹ BOI [par 379] Nitrogen equivalent calculations

Written Comment No:0496

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

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

Written Comment No:0496

	can be justified.
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Further comment:

If the relocation of Salmon Farms is allowed to go ahead it over-rides the Marlborough Sounds Resource Management plan and the Supreme Court decision making a mockery of the whole process of setting guidelines for the development of any kind.

In conclusion:

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

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

Potential relocation of salmon farms in the Marlborough Sounds.

Lorraine Andrews

[REDACTED]

[REDACTED]

I support the relocation of the salmon farms as I feel it will help the environment and improve the health and quality of the salmon.

Aquaculture is very important as a sustainable food source.

It will be good for employment in the Nelson Marlborough regions.

signed



15/02/2017

Written Comment No: 0399

Subject	Submission on application concerning 360A and 360B of the Resource Management Act that is subject to public notification by the
From	<u>Kristy Andrews</u>
To	aquaculture.submissions@mpi.govt.nz
Sent	Monday, 27 March 2017 5:02 PM
Attachments	<<Submission on application concerning 360A and 360B of the Resource Management Act that is subject to public notification by the.docx>>

Please find attached my submission to Oppose the NZKS farms in the Marlborough Sounds.

Kind regards
Kristy Andrews

Written Comment No: 0399

Submission on application concerning 360A and 360B of the Resource Management Act that is subject to public notification by the Minister of Aquaculture

This is a submission on the whether the Minister for Primary Industries, exercising aquaculture responsibilities, should recommend regulations to amend the Marlborough Sounds Resource Management Plan to provide for the relocation of up to six existing lower flow salmon farm sites to areas of higher flow.

Part of this submission relates specifically to the proposed Tio Point Farm.

Comments close 5pm, 27 March, 2017

Name: Kristy Andrews

Contact Person: Kristy Andrews

Postal Address: [REDACTED] Marlborough 7244

Email: [REDACTED]

Mobile: [REDACTED]

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

Comments sent to: aquaculture.submissions@mpi.govt.nz

DATE: 27 March 2017

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

ISSUE	COMMENT
Process	<ul style="list-style-type: none">• The use of Section 360A of the RMA gives the Minister of Aquaculture the power to over-ride the Marlborough Sounds Resource Management Plan.• It takes decision-making and resource management away from the Marlborough District Council and local community. King Salmon state that they have spent months talking with community groups, iwi and industry groups. Considering there are only four residents in Oyster Bay why have they not been included in any of these talks? Surely, they are considerable stakeholders within the process?• It disregards the 2013 Board of Inquiry [BOI] and 2014 Supreme Court decisions about expansion of salmon farming into prohibited areas of the Marlborough Sounds.• The proposal provides commercial benefit for one company and it's partners, in this case the iwi leasing the site to NZKS using public water

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	<p>space above the interests of other users of the Marlborough Sounds, including other iwi.</p> <ul style="list-style-type: none"> • It sets a precedent for the Minister to make similar water-grabs around New Zealand, usurping the power of local authorities and wishes of local communities.
Precautionary Approach	<p>Policy 3 of the NZ Coastal Policy Statement calls for a precautionary approach. This was reinforced by the BOI decision [par 179].</p> <ul style="list-style-type: none"> • The three new high flow sites granted by the BOI are only just coming on stream. It would be precautionary to wait until monitoring shows the company can operate these sites, along with their other high-flow sites, to comply with the Benthic Guidelines at maximum feed levels for at least three years before any more space is considered. [consistent with BOI Condition of Consent 44a] • This especially applies to Tio Point, which would be the fourth salmon farm in close proximity in Tory Channel. (<i>see figure 1</i>) Although talked about as Tio Point the proposed site is actually in Oyster Bay. Oyster Bay is already heavily compromised by both existing and consented marine farms. • In the meantime, reduce the feed and stocking rates at the low flow sites to meet the Benthic Guidelines.
Nitrogen Pollution	<p>We dispute the accuracy of Minister's statement: "This proposal is about making better use of existing aquaculture space. There is no proposed increase in the total surface structure area used for salmon farming in the Marlborough Sounds," – Nathan Guy, Minister of Aquaculture. 2</p> <ul style="list-style-type: none"> • The proposed relocation sites are not "existing aquaculture space". They are prohibited to aquaculture. • While farm surface area may remain about the same, there is a proposed five-fold increase in fish feed to 24,600T a year. • With more feed and more fish, the amount of nitrogen pollution discharged into the Sounds through salmon faeces would also increase. The high-flow farms would be discharging the equivalent of the nitrogen in sewage from a city the size of Christchurch, straight into the sea.¹ • Residents must meet strict obligations to keep waste out of the enclosed waters of the Sounds. Yet this proposal would allow the untreated discharge of polluting nutrients from six new salmon farms. • As a land-based comparison of low flow and high flow sites, it is not OK for a dairy farmer who has been pulled up for discharging effluent into a

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	<p>small stream to resolve the issue by increasing his herd and discharging to a faster river</p>
Offshore Alternatives	<ul style="list-style-type: none"> • The NZKS Supreme Court decision ruled there was an obligation to consider alternatives under the NZ Coastal Policy Statement and Section 32 of the RMA. “Particularly where the applicant for a plan change is seeking exclusive use of a public resource for private gain.” [SC 172-173] • Having salmon farms offshore (open ocean aquaculture) rather than in the confines of the Marlborough Sounds would dilute the pollution and remove the conflict with other users. This approach is being used in countries such as Norway. • Offshore alternatives are barely mentioned in this proposal. NZKS claims 1 BOI [par 379] Nitrogen equivalent calculations 3 it would be achievable in 10 years but was too expensive and not yet proven. There is no information about what is happening in other countries and no cost-benefit analysis about off-shore alternatives. • Rather than pushing this relocation proposal for areas prohibited to aquaculture, MPI and the industry should invest in research to expedite offshore farming as a future-proofed alternative.
Cumulative Visual Impact	<ul style="list-style-type: none"> • Tory Channel is used by thousands of visitors to the Marlborough province via the Ferries each year as well as Recreational and Residential Sounds Users. With the land already comprised by extensive forestry and gorse plantings the continuing and hurried expansion of marine farming in this busy and narrow passage of water detracts even further from what should be and once was an area of enormous natural beauty. • The current residential owners of the properties within Oyster Bay have considerably improved and continue to work on improving the the environment both on land and the sea in many ways. These include but are not limited to not destocking the paua that naturally occur within the bay, poisoning wilding pines, planting natives, poisoning wasps, controlling pests and non-native wildlife in the bay. •
Cumulative Environmental Impact	<ul style="list-style-type: none"> • The impact from the harvesting of Forestry on water quality and seabed health within Oyster Bay combined with heavy marine farming, both existing and proposed can only be detrimental to the environment both above and under the water. • It's enivitable the beaches in Oyster Bay will become smothered with sludge into the future with the operation of a salmon farm in the head of the bay and the harvesting of the forestry surrounding it. There needs to be accountability and management of any depletion in environmental quality. Although the site is high flow allowing

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	<p>more movement of the sediment away from the farm, it doesn't appear NZKS intend to change any practises. The new site in Tory Channel is too young to understand the effects in a high flow situation on the benthos and it is not located at the head of a shallow north west facing bay.</p> <ul style="list-style-type: none"> • If there is a prevailing North West wind Oyster Bay residents are likely to be swamped with the noise, smell and sediment flow.
Water Quality	<ul style="list-style-type: none"> • We have not seen any water quality analysis or study that has been done within the bay, all works are in or around the immediate site. How can the water quality be understood until the bigger picture, the whole bay, is looked at in its entirety? Also as the Ngamahau site is in its infancy how can anyone correctly predict the cumulative effect of all the farms in one location on the water quality and benthos. How is the effect to be monitored and who will be accountable should it change? The likelihood of Algal blooms if they are all in one area? • Oyster Bay is affected by north westerly weather patterns which forces material into a shallow embayment. Oyster Bay is not like the main stem of Tory Channel as it has less current flow and effects on water quality and clarity are retained over longer time frames than the rapid changes and dilution that occurs in the main channel. • The coast near the site is shallow because sediment has been trapped in this location by the Tory Channel current. Although the site has high flow and the modelling predicts the waste matter will go mainly towards Tory Channel, from our personal experience of the bay and the winds and currents and all the points above we are struggling to understand how this conclusion can be drawn with such a limited study of the inner bay and its behaviour. • What will happen if the location of the farm changes the hydrodynamics of the bay? Who will be accountable? What will be the penalty? And how will any damage be corrected? • Why is there a need to retain the already consented mussel farm consent adjacent to the proposed salmon farm that they are not using? We were advised that this consent was being surrendered at the MPI drop in, but this appears not to be the case. If it's not surrendered the cumulative effect is even greater on Oyster Bay residents amenity values. •
Noise and Odour	<ul style="list-style-type: none"> • Noise is also of a large concern to residents. Currently residents are able to hear the Clay Point farm generator on still nights and in certain weather conditions and feel the proposed sites generator and feeders will intrude on their quiet enjoyment of the sounds, and as it is being placed directly in the entrance to the bay in close

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	<p>proximity to their properties, they will hear the farm on a much more consistent basis than we hear Clay Point. We assume there will be workers on the site and their noise and movements will also be heard from their place. Of particular concern is the noise that would also be generated from net cleaning and at harvest time and when these harvests will occur. What noise the feed barge will bring and how often the feed barge will visit the site.</p> <ul style="list-style-type: none">• There is no indication of the vessel or barge movements associated with the site or hours of operation. We consider all will have some impact on the amenity of our property.• Inevitably with the location of the farm the smells attributed will end up heading our way on the predominate North West wind and sitting on our beach would become unpleasant. The noise and social report completed appears to not include our property and we are directly open to the farm with no land mass to soften the sounds or redirect the smells.
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Subject	MPI Potential Salmon Relocation
From	Mike Taylor
To	aquaculture submissions
Sent	Sunday, 26 March 2017 9:13 p.m.
Attachments	<<Letter regarding support for the Salmon Farm relocations.pdf>>

Please find attached a copy of my letter regarding my support for the Salmon farm relocations in the Marlborough sounds.

Thanks

Mike Taylor | Manager
Aotea Electric Nelson Ltd

Cell: [REDACTED] | Ph: [REDACTED] | Fax: [REDACTED]
[REDACTED] | Stoke | Nelson 7011

www.aoteaelectric.co.nz



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24-03-2017

Ministry for Primary industries
Private Bag 14
Port Nelson

Aotea Electric Nelson Limited

New Zealand

Ph: [REDACTED]
www.aoteaelectric.co.nz

Re:- Salmon Farm Relocation

Attention: The Salmon Relocation Advisory Panel

I was born in Nelson, and lived here all my life, currently live in Brightwater, married and have two young boys, I have been brought up in the Nelson area and also have spent a lot of the time since the age of 9 years in the Marlborough sounds. We currently own and have owned a property in the Marlborough sounds for the past 17 years, have been brought up (and passing on to my boys) with the respect of our fisheries and the environment. I am also one of the owners/director and the branch manager of Aotea Electric Nelson, we currently employ 23 staff and have been carrying out electrical installation and maintenance for industrial (mainly aquaculture) and commercial clients in this area for the past 10 years. We have provided electrical service for NZKS for about 2 years and have found them to be a very good client that has a lot of thought and good processes for any aspects of their day to day business. We had also established about a year ago an electrical company in Blenheim, Aotea Electric Marlborough, which employs about 9 staff and also provides electrical service to NZKS for their Picton based side of the business.

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.

Environmentally, it will also have a lower level of effect on the seabed which will have positive environmental benefits as adopting the Best Management Practice guidelines that were agreed by the Council and community is the future for aquaculture globally.

Other benefits that I would agree on are that 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 and moving some farms away from coastal holiday home/baches to more remote locations will improve social amenities in these areas.

Kind Regards,

Mike Taylor
Manager

Cell Ph: [REDACTED]

Email: [REDACTED]

Web: www.aoteaelectric.co.nz



Written Comment No: 0508

Subject	submission
From	Bruce Hearn
To	aquaculture submissions
Sent	Sunday, 26 March 2017 7:03 p.m.
Attachments	<<Template Salmon Relocation Submission (2).docx>>

Attached please find my submission on the potential relocation of salmon farms in the Marlborough Sounds.

Regards

Bruce Hearn



27 March 2017

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

Submission on Potential Relocation of Salmon Farms in the Marlborough Sounds

Submitter Details

Full Name of Submitter

Mr/Bruce John Hearn

Apex Marine Farm Ltd

Address for Service [REDACTED] Blenheim 7201

Email

Phone Number(s)

1.0 Introduction

1.1 I have a particular interest in the salmon farm relocation proposal because we are long time marine farmers and neighbours of salmon farms and believe that aquaculture including salmon farming is one of the most environmentally sustainable methods of producing protein available

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

1.3 I would like to speak to my written comments at a public hearing.

2.0 Expression of General Support

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

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

2.3 The New Zealand aquaculture industry respects and values the waters it farms in and is well known for producing high quality seafood with the lightest touch on the environment. Salmon farming is one of the most sustainable sources of quality protein on the planet and this has been recognized through Monterey Bay Aquarium's Seafood Watch 'Best Choice' rating.

2.4 New Zealand's King (Chinook) salmon is recognised both at home and worldwide as a premium species of salmon and is highly valued across a range of consumers, from kiwi backyard BBQs to Michelin starred restaurants. It is also packed full of essential nutrients and has one of the highest natural oil contents of all salmon varieties, making it a quality source of Omega 3s.

2.5 Salmon farming is an industry we can be proud of and at the same time be excited about for our future.

3.0 Key Messages

3.1 I agree with the potential benefits that have been identified in the proposal, particularly to:

- 3.1.1. Ensure the environmental outcomes from salmon farming are improved through implementation of benthic best management practice;
- 3.1.2. Improve the social and cultural outcomes from salmon farming by creating jobs and moving salmon farms away from areas of high competing use;
- 3.1.3. Increase the economic benefits from salmon farming.

3.2 The particular principles I support include:

- 3.2.1 Support for the Best Management Practice guidelines for salmon farms in the Marlborough Sounds which were developed collaboratively with the community and experts to ensure well managed salmon farming in balance with the ecology of the Marlborough Sounds.
- 3.2.2 Recognition that a better operating environment, ie higher flow, cooler water, means better environmental, operational and animal husbandry outcomes for salmon farming in general and particularly for New Zealand's King (Chinook) salmon species.
- 3.2.3 Recognition that low flow, warmer sites constrain the ability for a salmon farming operation to meet the Best Management Practice guidelines while maintaining economic viability.
- 3.2.4 Recognition that the substantial suite of analysis that guides the proposal serves to strengthen knowledge and understanding of and for the salmon industry in general and that this brings broader opportunities for New Zealand as a whole.
- 3.2.5 Support for the robust and comprehensive analysis and consultation being carried out as part of the Resource Management Act (RMA) s360 process.

4.0 Additional Comments

We request that a condition be imposed on the salmon farm consent holders that seeks to limit any sequential downstream effects on the licences and consents of adjacent or nearby marine farms. This would include any adverse cumulative effects and it would be the responsibility of the salmon consent holder to mitigate those effects. We request that our existing occupation be given priority in future decisions.

Written Comment No: 0508

My signature signed Bruce John Hearn

Written Comment No:0495

Subject	New Zealand King Salmon Marlborough Salmon Relocation
From	<u>Charmaine Gallagher</u>
To	aquaculture submissions
Sent	Monday, 27 March 2017 6:42 a.m.
Attachments	<<27 March 17 Submission AM CMG.pdf>>

Please Accept the attached as my submission for the Marlborough Salmon Relocation.

Charmaine Marie Gallagher, PhD
AquaMarine Sciences Limited

Written Comment No:0495

Aqua Marine Sciences Ltd



Ruby Bay

Phone/Fax: [REDACTED]

Email: [REDACTED]

27 March 2017

As a submitter to the New Zealand King Salmon (NZKS) Assessment of Environmental Effects for the application for 8 additional farms in 2012, I am encouraged to see improved consultation and a commitment to disseminate information in the 2017 application for relocation of farms in the Marlborough Sounds.

This credit goes to New Zealand King Salmon who have taken a proactive approach to this application in their commitment to initiate and develop a Marlborough Salmon Working Group. I am confident the Technical, Cultural, Social and Environmental Effects from the relocation of salmon farms has been addressed and I focus my submission on a few topics of interest. I applaud their commitment and sincerity in this process.

Having attended the Nelson Meeting provided by the Ministry of Primary Industries (MPI) I was impressed with the open sharing of information and the informed position of the Aquaculture Unit on the technical and environmental issues surrounding the salmon farm relocation.

There remain a few issues of concern:

Biophysical Suitability for Salmon Farming

The basis of this application given experience and additional professional advice, is that the newly proposed relocation regions are better suited to salmon culture. If this statement is true, I propose a phasing in of farming intensity. If the ecological conditions must be met and monitored it is worth identifying just where the intensity/feed load would trigger unsuitable impacts on water quality and benthic regions. In addition, given the hydrodynamics, it would be worthwhile to identify where the high flow regions may create "eddies" in particular bays that would create an "offsite" unexpected loading.

Seafloor Habitats and Communities

This is a great opportunity to witness and evaluate the nature of "recovery" in the Marlborough Sounds. Recovery of regions and bays where farms are removed can provide a wealth of information regarding environmental impacts of the seafloor.

Water Column and Water Quality

Impacts to the water quality are expected to be highly restricted and monitored. Changes in the ecology of these dynamic regions is to be expected and would be worth documenting and should be a function of phasing in the load under monitoring rather than instantaneous loading.

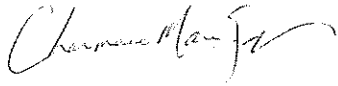
Undue Adverse Effects

If New Zealand King Salmon have come to Agreement with the overlying fisheries in the Marlborough Sounds (specifically scallop fisheries) to address any Undue Adverse Effects

Written Comment No:0495

(UAE) on fisheries; it would be to their credit. A quick review of Taylor and Dempster's Effects of salmon farming on pelagic fish suggests some indication of changes to fish condition and possible ecological traps making the fish vulnerable to capture. However, no real threat to fish populations was identified in that document and I will be curious to read the submission from the commercial and recreational fishing community.

Sincerely,

A handwritten signature in cursive script, appearing to read "Charmaine Marie Gallagher".

Charmaine Marie Gallagher, PhD

Written Comments No: 0271

Subject	Potential Relocation of salmon farms in the Marlborough Sounds
From	[REDACTED]
To	aquaculture submissions
Sent	Tuesday, 21 March 2017 9:26 a.m.

TO whom it may concern.

This submission is lodged by Aquaculture Direct Ltd (ADL). ADL is a private company based in Blenheim which provides consultancy services to the marine farming industry in New Zealand. The company has in the past provided professional services to NZKSCo and MPI. ADL has not been involved in decisions around the potential relocation of salmon farms in the Marlborough Sounds.

ADL strongly supports the marine farming industry in the Marlborough Sounds and recognises the economic benefit of salmon farming to the Marlborough and national economies.

With regards to the proposed relocation of salmon farms in the Marlborough Sounds ADL

SUPPORTS the swapping of salmon farm sites in the Marlborough Sounds which result in improved environmental outcomes

SUPPORTS any proposals which provides greater certainty to salmon farmers in the Marlborough Sounds and improved economic benefits to the Marlborough and national economy

SUPPORTS the proposed use by the Minister of RMA s360A to effect the relocation of salmon farms in the Marlborough Sounds

SUPPORTS Outcome One (page 5)

ADL does not wish to be heard.

Graeme Coates

Graeme Coates | Director | [Aquaculture Direct Limited](#)
Phone [REDACTED] | Mobile [REDACTED]
[REDACTED] | www.aquaculturedirect.co.nz



Subject	Submission - Aquaculture New Zealand
From	Rebecca Clarkson
To	aquaculture submissions
Sent	Monday, 27 March 2017 2:50 p.m.
Attachments	<<Salmon Relocation Submission.docx>>

Hi there, please find attached the submission from Aquaculture New Zealand on the Marlborough salmon relocation proposal.

Kind regards, Rebecca Clarkson

Rebecca Clarkson | Environment Manager | **Aquaculture New Zealand**

Phone DDI [REDACTED] | Mobile [REDACTED]

www.aquaculture.org.nz | www.aplusaquaculture.nz



Please consider the environment before printing this email

27 March 2017

Salmon Farm Relocation
Ministry for Primary Industries
Private Bag 14
Port Nelson 7042

The Potential Relocation of Salmon Farms in the Marlborough Sounds

1. Thank you for the opportunity to comment on the MPI consultation on the potential relocation of salmon farms in the Marlborough Sounds.

Expression of General Support

2. Aquaculture New Zealand (AQNZ) supports the principles of the proposed relocation and plan changes, noting in particular:
 - 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.
 - 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.
 - 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.
 - 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.
 - 2.5 Support for the robust and comprehensive analysis and consultation being carried out as part of the Resource Management Act (RMA) s360 process.
3. AQNZ does not support Outcome Three as it does not achieve these principles.

Aquaculture in New Zealand

4. AQNZ represents the interests of the aquaculture sector in New Zealand. This sector has significant export earnings in excess of \$330 million (total revenues in excess of \$450m) and a growth strategy with a goal of reaching \$1 billion per year in sales by 2025. Aquaculture directly employs more than 3,000 people primarily in regional communities.
5. Aquaculture makes a significant contribution to the Marlborough region and to New Zealand. Analysis of its economic contribution¹ carried out in 2015 found that *'aquaculture, comprising marine farming and the processing of its produce, makes a significant contribution to Marlborough's economic output, GDP and employment. Its direct sales and employment creation stimulate other local businesses such as marine service industries, retailing and hospitality trades, and it also supports incomes and consumer spending in the region. It helps to retain people in the region and attract new residents who support voluntary community activities which keep small rural communities functioning.'*
6. *'Aquaculture contributes to both regional and national economies by;*
 - *creating valuable output based on the natural resources of the marine environment*
 - *providing employment (859 jobs) for about 3.7% of the Marlborough region's total labour force, with around 1.1% in marine farming and a further 2.6% in seafood processing*
 - *paying average wages that are substantially higher than the average earnings in Marlborough*
 - *generating export sales revenue of \$276 million in 2014*
 - *contributing almost 6% (\$162 million) to Marlborough's regional GDP, with \$105 million (3.7%) from marine farming and \$57 million (2%) from seafood processing*
 - *providing inputs to seafood processing in regions outside Marlborough*
 - *delivering around 62% of New Zealand's aquaculture production by tonnes (62% of Greenshell mussels; 61% of salmon and 8% of oysters)'*
7. We recognise that the public expects marine farmers to be good tenants within the coastal marine area (CMA) and that means delivering very high levels of environmental management. We are conscious of the wide range of values, activities and users in the marine space and in recognition of this have recently launched a new sustainable management framework, A+ (www.aplusaquaculture.nz) to clearly demonstrate that our people and our products have the lightest touch on our valued and pristine environment.
8. Furthermore, the industry's internationally recognised reputation for quality and food safety depends heavily on the purity and sustainability of our growing waters so it is imperative to the ongoing sustainability of our industry that these are maintained and

¹ NZIER (2015). The economic contribution of marine farming in the Marlborough region.

enhanced.

9. Maori investment makes up a significant proportion of the current ownership of the industry and their role is expected to grow as aquaculture settlements deliver 20% of any new development to local Iwi. This creates both cultural and economic benefits, particularly in the regions. AQNZ supports specific consultation with Iwi on the proposal.
10. The Marlborough Smart and Connected vision for aquaculture is:

Marlborough Aquaculture – Highly valued, lovingly produced.

- *Marlborough aquaculture produces highly valued seafood that is globally sought after.*
- *It is lovingly produced in harmony with the region's unique environment, local communities and Iwi.*

11. This vision is demonstrated in the strong public support for aquaculture in the region identified in a Colmar Brunton report² which included confirmation that 73% of Marlborough residents have a positive perception of aquaculture. This research showed that the majority of Marlborough residents:
- Support sustainable aquaculture growth
 - Feel positive about the industry
 - Recognise the industry is a sustainable form of food production
 - Are aware it provides local jobs
 - Understand it significantly contributes to the local economy
 - Experience positive or no impact from the sector
12. The Government has identified aquaculture as a priority industry on the Business Growth Agenda for its real potential to help create a more productive and competitive economy with a lower environmental footprint. The Aquaculture Strategy and Five Year Action Plan identifies that quality planning and permitting and effective and responsive regulation are key strategic requirements for the industry. AQNZ welcomes this recognition.
13. AQNZ supports the s360 RMA process being undertaken to consider the proposal, noting that it includes a substantial analysis of the environmental effects, comprehensive public and Iwi consultation, independent recommendations and a full section 32 analysis as well as support from the Marlborough District Council. Further public input will also be enabled during any consenting process.

New Zealand's King Salmon

14. New Zealand's King (Chinook) Salmon is a recognised premium species for which we achieve an artisan share of the highest value segments worldwide. Our 'champagne of salmon' is highly regarded for its full flavour and decadent tenderness which has top

² Colmar Brunton, (2014). Public perceptions of New Zealand's aquaculture industry.

chefs around the world praising it as the best salmon they've ever eaten. It is also packed full of essential nutrients and has one of the highest natural oil contents of all salmon varieties, making it a quality source of Omega 3s.

15. The industry has evolved from a group of innovative pioneers, to a professional, specialised and quality food production sector focused on environmental sustainability, food safety and value added marketing. Our salmon is exported to 30 countries yet is readily available at local supermarkets and restaurants around New Zealand. Half of all salmon farmed in New Zealand is eaten locally – much of it served in family kitchens and at backyard barbecues.
16. Environmentally concerned consumers can also eat New Zealand salmon with a clear conscience, knowing that our industry is the only farmed salmon industry to have achieved a green light, best choice rating from the gold standard of sustainability guides, Monterey Bay Aquarium's Seafood Watch.
17. The industry is always evolving and improving and in the medium term this will likely include the ability to move farms further offshore – to deeper and more remote waters and with greater environmental and social benefits. However presently the technological and economic challenges are too great. Farming the whole life cycle of salmon in on-shore facilities is not viable due to the high water and energy costs as well as New Zealand's coastal land values.
18. Salmon farming in New Zealand generally occurs in regions where families are looking for secure futures away from urban areas. Stewart Island, Bluff, Twizel, Akaroa and Havelock's communities are all healthier and more vibrant because of the opportunities that marine farming jobs bring.
19. Salmon farming is an industry we can be proud of and at the same time be excited about for our future.

Technical Aspects

20. AQNZ supports the relocation of salmon farms from areas of low flow to the suggested higher flow sites as there will be environmental, biosecurity and welfare improvements as a direct result.
21. The water quality advantages of higher flow rates include:
 - 21.1 More stable water temperatures – low-flow waters, especially those in embayments in the Marlborough Sounds tend to be shallower and are subject to temperature variations diurnally and seasonally. Whereas the deeper, higher-flow sites will tend to maintain a generally more stable and restricted water temperature range, with less thermal stratification of the water column;
 - 21.2 More stable dissolved oxygen (DO) levels – shallower, low-flow waters tend to be subject to diurnal cyclic drops in DO due to the greater likelihood of warming

water during the day. With higher flow rates at the same water temperature, there is a greater supply of oxygen per unit time to the farms.

21.3 More rapid removal of dissolved nitrogenous compounds e.g. ammonia in the water column.

22. These all help to reduce stress on the fish which means good welfare outcomes and reduced stress-related immunosuppression and thus fish are much less susceptible to facultative pathogens, as disease generally only occurs if a range of host, environment and pathogen factors overlap sufficiently.
23. In addition to better physiological outcomes for the fish resulting in lower disease susceptibility, the higher flow rates will also result in any shed infective pathogen particles exiting the farm area quicker. This reduces the transmissibility of any pathogen and effectively means that the likelihood of an outbreak of disease on the farm is reduced, which is a benefit.
24. Increased water flow also facilitates solid waste removal, dispersing it over a wider area. This means the absolute quantity of faeces or other organic debris per square metre of benthos is reduced (the absolute number of square metres on which material is deposited is increased but at a proportionately reduced rate) as well as any resultant nutrient concentration and copper and zinc concentrations.
25. There is therefore less enrichment of the benthos as the same quantity of material generated by the farms are spread over a wider area. This will naturally tend towards lower Enrichment Scores (ES), this being the aim of the best management practice guidelines.
26. As dilution effects increase and as a wider area of benthos receives farm outputs, there is a point where copper and zinc levels deposited on the benthos per unit time will fall below an observable effect concentration and their presence becomes of negligible significance. Likewise, as ES reduces to 2 or below it effectively becomes background, as ES 2 can occur naturally or from other diffuse anthropogenic sources.
27. Finally, whilst flow rates are higher than at the current low flow sites, they are within flow rates at the remaining existing sites, and required swimming speeds are well within the capacity of the Chinook or King salmon³.

Specific Comments

28. In relation to specific requests for feedback AQNZ;
29. Agrees with the potential benefits identified in the proposal, particularly to;
 - ensure the environmental outcomes from salmon farming are improved through implementation of benthic best management practice;

³ Brett JR (1995) Energetics, In: Physiological Ecology of Pacific Salmon, Eds: Groot C, Margolis L, Clarke WC, Department of Fisheries and Oceans, Canada. UBC Press, Vancouver.

- improve the social and cultural outcomes from salmon farming by creating jobs, and moving salmon farms away from areas of high competing use;
 - increase the economic benefits from salmon farming.
30. Supports the principal that restricted discretionary consent activity status is the most appropriate in cases where extensive and robust upfront planning has occurred and notes that in this case the information gathering, peer review, consultation and proposed decision-making process serves to meet that requirement.
31. Does not support a general prohibition of future aquaculture at the existing sites, noting that future innovations, opportunities, technologies and community needs may evolve and develop over time so that new aquaculture opportunities are deemed to be positive and appropriate.
32. Supports future Iwi settlement opportunities in the region, noting the considerable value and values that Iwi aquaculture can bring to the industry and the community as a whole.
33. Supports staged adaptive management as a positive mechanism to monitor and manage potential effects while enabling sustainable growth.
34. Notes that for farms managed within agreed benthic limits (such as the BMP) the effects on the wider water column are orders of magnitude less than the managed and localised benthic effects. Furthermore, in the context of other local activities such as sewage, run-off from land, sedimentation, vessel discharge, and boat maintenance activities, the water column effects of salmon farming are minor.
35. Supports careful siting of marine farms to minimise effects on sensitive benthic environments such as reefs and notes that the proposal includes extensive analysis and mitigation in this regard.
36. Supports responsible biosecurity practices including through Biosecurity Management Plans where appropriate and notes that an important tool for managing biosecurity risks is access to range of sites in a range of locations.

AQNZ requests to be heard in support of this submission.

Yours sincerely,



Environment Manager
Aquaculture New Zealand

Written Comment No: 0369

Subject	salmon farm
From	Arapawa Blue Pearls
To	aquaculture submissions
Sent	Friday, 24 March 2017 10:42 AM
Attachments	<<SupplierSalmonFarmRelocationtemplatesubmission.docx (1).docx>>



Mike and Antonia Radon
Arapawa Blue Pearls

[REDACTED]
Whakenui
Picton 7250
[REDACTED]

Written Comment No: 0369

Salmon Farm Relocation

Ministry for Primary Industries

Private Bag 14

Port Nelson

aquaculture.submissions@mpi.govt.nz

To: The Salmon Relocation Advisory Panel

My name is Mike Radon, I am managing director and owner (along with my wife Antonia) of Arapawa Sea Farms Limited. We are located in Whakenui Bay, Tory Channel. We have been here since 1993 and do conventional farming (beef and sheep) as well as Paua diving and on shore Paua farming.

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.

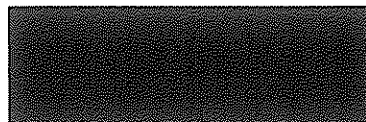
King Salmon have shone themselves to be great neighbours. We routinely use the same water taxi's which saves us time and money. Their people have volunteered and helped us with Paua reseeding in Tory channel helping to replenish dwindling stocks.

I see no negatives for ourselves or our company from moving salmon farms from poor sites to more environmentally friendly sites. It's a no brainer!

Would like to be heard.

Name: Mike Radon

Date: March 24, 2017



Written Comments No: 0417

Subject	MPI Potential Salmon Farm Relocations
From	<u>Liz - Arbour</u>
To	aquaculture submissions
Sent	Friday, 24 March 2017 6:19 PM
Attachments	<<NZKS Salmon Farm Submission - Arbour Restaurant.pdf>>

Good evening

Please find our letter attached. We use New Zealand King Salmon (Ora King) in our restaurant.

Have a lovely day

Kind regards,

Liz Buttimore

Arbour

Aronui DineOut Awards Best Restaurant Marlborough

MCOC Westpac Supreme Business Award 2016

MCOC Trustpower Customer Service Award 2016

[REDACTED]
[REDACTED] Blenheim, NZ

Written Comments No: 0417

Salmon Farm Relocation
Ministry for Primary Industries
Private Bag 14
Port Nelson

Friday, 24 March 2017

To: The Salmon Relocation Advisory Panel

We own Arbour restaurant in Blenheim, Marlborough. We are an owner operated restaurant and our unique selling point is showcasing almost entirely local produce on our menus.

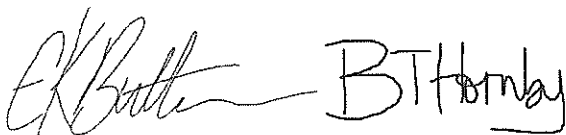
We host many tourism visitors through Tourism New Zealand, Destination Marlborough and FIT travel into Marlborough and we ensure that they are served the best produce from our region. Ora King salmon (New Zealand King Salmon's premium grade of salmon for chefs) is featured in some way in our restaurant on a daily basis, whether it is on our MANY tastes of Marlborough menu or on our a la carte. Our chefs, visitors and locals alike love the product.

We work closely with the team at New Zealand King Salmon on charity and community events. We host four charity events a year and they sponsor almost every one. We are only a fraction of the local charity and community events that they back and many of us couldn't continue to do the social work we do without their support.

We have a great respect for their farm team and the passion they show for their product in every interaction with us or the public.

We trust MPI's proposal to potentially relocate the salmon farms and trust it will provide for better environmental, social and economic outcomes.

We would welcome phone calls or emails regarding our proud use of this product and the level of support our community events have received by New Zealand King Salmon.



Kind regards,

Liz Buttimore + Bradley Hornby
Arbour Restaurant

Aronui DineOut Awards Best Restaurant Marlborough
MCOC Westpac Supreme Business Award 2016
MCOC Trustpower Customer Service Award 2016



Written Comments No: 0444

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?

potential contracting work which with high flow sites could possibly become full time work. having full time work will allow me constant income I will be able buy property in pilton. high flow sites will ~~have~~ have a large impact on the community with an increase of employment.

~~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: *Ulyssess Ashby*
Organisation/Company: *NZKS*
Role: *FT diver*

Email:

Phone:

Date: *21/03/17*

Written Comments No: 0444

Subject	To The Salmon Relocation Advisory Panel
From	jason watene
To	aquaculture submissions
Sent	Monday, 27 March 2017 9:59 a.m.
Attachments	<<Jason Watene.jpg>> <<Ullysess Ashby.jpg>> <<Jordan Eagle.jpg>>

Hi,

I have attached 3x submission for the Salmon Farm Relocation Advisory Panel in favour of swapping the low flow sites for higher flow sites.

I am fully supportive of NZKS as for the last 8-9yrs, the stability of work at NZKS has allowed me to purchase a house in Marlborough and raise my two small children (8&6) in a stable, loving friendly atmosphere. They have been able to participate in many extra curricular activities and enjoy a very stable consistent home life with both parents. This would not be possible anywhere else in NZ with the skillset I have (Commercial Diving Qualifications).

Kind Regards
Jason Watene

Subject	170306-SubmissionForm.pdf
From	[REDACTED]
To	aquaculture submissions
Sent	Thursday, 9 March 2017 12:01 p.m.
Attachments	<<170306-SubmissionForm.pdf>>

Written Comment No: 0165

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

Written Comment No: 0165

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			
Address			
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 type="checkbox"/>	I would like to speak to my written submission at a public hearing in <input type="text"/>
<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).

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.

Written Comment No: 0165

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: 0285

Subject	#haveyoursay
From	Martin Austin
To	aquaculture submissions
Sent	Wednesday, 22 March 2017 12:37 PM

I would like to submit on the relocation of salmon farms within the Marlborough Sounds. I currently live and work in the Marlborough area based in Havelock.

I fully support MPI in relocating the farms to higher flow areas for 3 reasons

1. The location of the farms will improve the health and productive potential of the salmon farms, this is positive for animal welfare, sustainability and output. This will ultimately mean there are less overall sites.

2. The high flow sites will result in less overall environmental impact from the farms.

3. Aquaculture as a production system of protein for human consumption has a lower environmental impact than the alternatives offered by agriculture . Population growth is the driver for growth in food population. Given that no-one is contemplating means to reduce population growth there are few options available. To produce the same quantity of protein on land would require significant conversion of forest into pasture based agriculture. This is environmentally worse than aquaculture. This means we should support the move of the farms.

There is no production system that has no impact on the environment. The only issues is is the impact sustainable. Clearly the movement from low flow to high flow locations makes the system more environmentally sustainable.

Martin