

Contents Page: Burdass - Burtenshaw

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

| Written Comments Number | Last Name | First Name |
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| 393 | Burdass | Mark |
| 565 | Burgess | Owen |
| 566 | Burgess | Rosie |
| 445 | Burgoyne | Rod |
| 222 | Burrows | Geoffrey and Jenny |
| 561 | Burtenshaw | Aaron |

Written Comment No: 0393

| | |
|-------------|--|
| Subject | Marlborough Salmon farm relocations |
| From | Mark Burdass |
| To | aquaculture submissions |
| Sent | Friday, 24 March 2017 3:05 PM |
| Attachments | <<Potential-Relocation-of-Salmon-Farms-in-the-Marlborough-Sounds-Feedback-form-Word-version.docx>> |

Hi

Please find attached my submission

Regards

Dr Mark Burdass
Aquaculture Programme Coordinator
Nelson Marlborough Institute of Technology

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

Written comments must be lodged by 5pm on Monday, 27 March 2017.

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

Consultation questions

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

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

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

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

Written comments are official information

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

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

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Public hearings

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

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

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

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

Questions

Question 1:

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

From the information that has been presented it makes sense to relocate the six farms that are listed. All of the current sites are sub-optimal for salmon farming and salmon welfare.

Question 2:

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

All of the relocation sites are suitable for salmon farming and provide locations that would improve waste dispersion and improve the rearing environment for salmon.

Question 3:

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

All the current low flow sites present an issue with the poor dispersal of organic waste and reduced flows that can affect the welfare of the salmon long term. It is my opinion that all the low flow sites should be relocated

Question 4:

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

No

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Question 5:

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

The review undertaken so far has covered all the main benefits and costs for this proposal

Question 6:

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

Salmon farming in New Zealand is already well regulated and with the further developments in environmental impact assessment there are sufficient controls to ensure a well regulated industry.

Question 7:

Provided that detailed standards and requirements are met, do you agree that salmon farming on the potential relocation sites should be a restricted discretionary activity?

Question 8:

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

Not necessarily.

The surface structure space should be determined by the system requirements for the new sites. It slightly more space is required to accommodate new cage systems which are able to cope with the new sites flow dynamics it should not be an impediment to developing the site

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Question 9:

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

Other forms of aquaculture should be allowed in these sites, they may not be optimal for salmon but they will be ideal for other species.

Question 10:

Given the multiple ownership at Crail Bay MFL32, if this site is relocated, should aquaculture be fully prohibited or should shellfish farming be allowed to continue?

Shellfish farming should be allowed to continue

Question 11:

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

Yes, with any new development it would be good to develop experience in the management of these new sites.

Question 12:

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

No

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Question 13:

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

Question 14:

Which of the existing lower-flow salmon farms in the Marlborough Sounds do you think are a higher priority to relocate and why?

The Crail Bay and Waihinau sites would be a priority as these have had significant issues with welfare and mortalities in the past exacerbated by the low flows at these sites.

Question 15:

Is there anything specific that you would like the Minister for Primary Industries to be aware of for any of these sites when thinking about the potential relocation proposal?

No

Question 16:

Are there particular landscape or natural character values that you want to identify to the Minister for Primary Industries for any of the potential relocation sites?

No

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Question 17:

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

No

Question 18:

Are there any further measures that you believe could be taken to reduce effects at on landscape and natural character at the potential relocation sites?

No

Question 19:

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

The increased flow will allow more effective dispersal of the nutrient loading from the salmon farms. This will allow much better assimilation of these nutrients in the environment and allow better recycling of organic load. This will reduce the impact of salmon farms on the local environment. The higher flow rates and better water column stratification will allow the salmon to be grown in a more welfare friendly environment and also improve the quality of production by New Zealand King Salmon

Question 20:

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

As long as effective monitoring is in place to review the impact of the farms and a staged approach within a specific area is adopted.

Question 21:

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

No

Question 22:

What further information would you suggest the Minister for Primary Industries collects on water quality effects in relation to the Tio Point site?

Question 23:

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

The increases flow at these sites will reduce the specific burden of organic loading, the increased flow may well increase the area of effect. However, the lower organic burden is much more likely to be more effectively recycled in the natural environment. These effects are well documented in the scientific literature on the impact of cage farming.

Question 24:

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

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Question 25:

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

No

Question 26:

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

No

Question 27:

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

Question 28:

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

Not aware of any.

Question 29:

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

Cage farms rarely present a risk to sea mammals in terms of a more global context. My experience from Scotland, new Zealand and Canada is that cage farms often attract sea mammals around the structures as these are often sites which attract food for these animals

Question 30:

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

No

Question 31:

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

Biosecurity of New Zealand's salmon farming is of critical importance to the future success of the industry. The industry currently operates in an environment with few pathogens or problems that is critical to its success. There are significant threats globally to chinook farming, hence why new Zealand is one of the few places where they are farmed. I would therefore agree that an independent review should be in place.

Question 32:

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

For any farming activity undertaken we have a moral obligation to ensure that the animals under our control are provided with a safe environment which doesn't reduce the welfare of these animals. When the current low flow sites were identified as potential salmon rearing areas there was very limited understanding of the needs of the fish. This has significantly changed in the last 20 years. Improving the environment that we rear the fish in is a significant contributor to improving welfare of the salmon we rear. The ne higher flow sites will improve oxygen within the

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cages and also increase swimming activity. Both of these factors will reduce stress and improve welfare of the reared salmon. As salmon are a vertebrate, their welfare

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Question 33:

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

Not aware of any

Question 34:

What is your view on the Waitata Mid-Channel site from a navigational perspective, and the possibility of cruise ships or large superyachts using the area?

In my experience there is very limited boat traffic other than aquaculture vessels and local fisherman in this area. The location isn't a significant navigational route to areas of interest.

Question 35:

Are there particular tourism and recreation values that you would like the Minister for Primary Industries to be aware of at any of the potential sites?

No

Question 36:

What measures could be taken to remedy or mitigate effects on tourism and recreation values if salmon farms were relocated to these sites?

Salmon farming as an activity is often associated with tourist activities. There are often tourist trips to salmon farms elsewhere in the world. Perhaps this could be developed as a mutually beneficial activity in the area

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Question 37:

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

Not aware of any

Question 38:

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

The relative remoteness of the proposed farm locations would mean that the impact of any noise on the farms would be minimal. Caged fish farming as an activity is not a particularly noisy industrial activity as significant noise can disturb the fish, reduce feeding, and increase stress.

Question 39:

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

Underwater lighting to ensure better rearing efficiency is used extensively around the world in other salmon industries. This technology has been around for over 20 years and very little impact has been identified.

Question 40:

Social and community effects of the potential relocation proposal are wider than just residential amenity. What effects do you think there will be as a result of the potential relocation proposal?

The relocation would allow for better rearing conditions and also improved production. The improvement would lead to an expansion in New Zealand King Salmon's workforce. The improved employment opportunities in the area is really important in ensuring rural communities remain viable and sustainable.

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

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

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

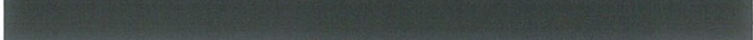
Written Comment No: 0565

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

Email to:
aquaculture.submissions@mpi.govt.nz

Submission on proposed use of Section 360A of the RMA to allow massive expansion of salmon farming in the Marlborough Sounds.

Name of Submitter in full OWEN STANLEY BURGESS
Address

Email  PICTON

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 checked="" type="checkbox"/> | I do not want to speak to my written submission at a public hearing |

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

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

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

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

The Marlborough Sounds needs proposals for protection and restoration of its natural environment and marine ecosystem, **NOT** proposals for further exploitation and degradation such as this one. It is submitted that the aim of this MPI proposal, thinly disguised as salmon-farming relocation, is in fact a proposal for the massive expansion of salmon farming in the Waitata Reach area of the Pelorus Sound.

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

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

The Board of Inquiry drew the limits

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

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

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

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

The best Place for Salmon Farming?

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

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

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

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

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

Other objections: M.P.I HAVE A VERY POOR REPUTATION FOR HONESTY AND INTEGRITY MONITORING FISHING INDUSTRY WITH JOINT VENTURE JESSCAS. I SUGGEST THAT THE OMBUDSMAN MAKE THE DECISION RATHER THAN THE INCOMPETANT PANEL SUGGESTED

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

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

Email to:
aquaculture.submissions@mpi.govt.nz

Submission on proposed use of Section 360A of the RMA to allow massive expansion of salmon farming in the Marlborough Sounds.

Name of Submitter in full
Address

RODIE ISABEL GRACE BURGESS

Email

[REDACTED] ACTION

Telephone (day)

Mobile

[REDACTED]

| | |
|-------------------------------------|--|
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| |
|-------------------|
| Other objections: |
|-------------------|

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

Written Comments No: 0445

| | |
|---------|-------------------------------------|
| Subject | Salmon Farm Relocation |
| From | The Bluewater Lodge |
| To | aquaculture submissions |
| Sent | Sunday, 26 March 2017 10:36 a.m. |

Dear Sir/Madam

I have know doubt this processes is a waste of everyones time and the outcome has already been decided, and any submissions made will be ignored.

In a nut shell King Salmon have shit in their own nest to the point where the nest is no longer habitable and now they want a bigger nest so they can spend their shit over a wider area. The National government seems happy to oblige.

We can only hope this government is sitting on the opposition benches after the coming election, and any decisions made here are reviewed and over turned.

Kind Regards
Rod Burgoyne
The Bluewater Lodge
Te Punaruawhiti (Endeavour inlet)
Marlborough sounds
enquiries@thebluewaterlodge.co.nz

Written Comments No: 0222

| | |
|---------|------------------------------------|
| Subject | salmon farming. |
| From | [REDACTED] |
| To | aquaculture submissions |
| Sent | Wednesday, 15 March 2017 4:37 p.m. |

We agree that Nz Salmons submission, would be better for everybody.
Geoff and Jenny Burrows.

Written Comment No: 0561

Salmon Farm Relocation

Ministry for Primary Industries

Private Bag 14

Port Nelson

aquaculture.submissions@mpi.govt.nz

To: The Salmon Relocation Advisory Panel

Aaron Burtenshaw, Harvest Team, New Zealand King Salmon

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

I understand that by relocating farms from lower water flow sites to higher water flows sites fish performance will improve and therefore the health of the salmon. It will also have a lower level of effect on the seabed which will have positive environmental benefits.

Environmentally adopting the Best Management Practice guidelines that were agreed by the Council and community is the future of aquaculture globally.

There will be more direct and indirect jobs created if this proposal goes ahead resulting in economic improvements for the communities in the top of the south.

Moving some farms away from baches to more remote locations will improve social amenities which is also a good thing.

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

Signature:



Date: 22-3-2017