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

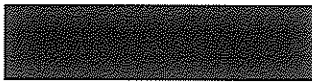
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Written Comment No: 0374

Subject	Marlborough Sounds Salmon Farm Relocation Proposal
From	<u>leith cameron</u>
To	aquaculture submissions
Sent	Friday, 24 March 2017 11:50 AM

to:The Marlborough Sounds Salmon Farm Relocation Advisory Panel and Nathan Guy

from: Leith Cameron



I am against the whole Ministry of Primary Industries proposal for Potential Relocation of Salmon Farms in the Marlborough Sounds.

I am unable to speak to this submission.

I am most concerned at the overturning of the democratic process in this proposal. This proposal overrides the Marlborough District Council's Plan by allowing salmon farms in areas prohibited for aquaculture in the Sounds. What's this about? Isn't AotearoaNZ a Democracy where local people have determination over their area through decisions made at local councils?

The Sounds need protection. I lived in Miro Bay, Pelorus Sound, for 23 years and witnessed first-hand the deterioration and depletion of the ecosystem and fish stocks, since the introduction of forestry, mussel farming and wholesale dredging. Industry in paradise.

The waters are too warm already for sustainable salmon farming - as proved - and with global warming, temperatures are predicted to increase. Surely, to allow this proposal will only result in further pollution and fish deaths. Who will clean up and fund that mess?

I implore you, for the sake of future generations, not to proceed with this proposal.

Leith Cameron

Written Comment No: 0188

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

JAMES CAMPBELL

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 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).

Written Comment No: 0188

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

Other objections: *Also a potential navigational hazard.*

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. 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. It can be done we submit.

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.

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.

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.

The best Place for Salmon Farming?

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.

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.

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.

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.

The Board of Inquiry drew the limits

Written Comment No: 0189

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

Helen Judith Campbell

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 _____
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- The issues include: fewer fish, not as many species, serious loss of biogenic habitats, sedimentation in estuaries and biosecurity incursions.

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

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

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

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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.

Other objections:

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

Written Comment No: 0176

Subject	salmon farm expansion submission
From	[REDACTED]
To	aquaculture submissions; yachtantidote@gmail.com
Sent	Friday, 10 March 2017 12:34 p.m.
Attachments	<<Candlish.pdf>>

Written Comment No: 0176

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 JAMES PAUL CANDLISH
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 checked="" type="checkbox"/>	I would like to speak to my written submission at a public hearing in _____
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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.

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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 Written Comment No: 0176

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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.

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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:

WHY CONTINUE WITH WHAT IS OBVIOUSLY A
UNSUSTAINABLE ACTIVITY IN THE
MARLBOROUGH SOUND. WHY DO WE HAVE
TO PUNISH THE GOVT FOR WHAT IS RIGHT!

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

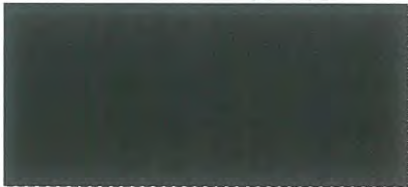


Relocation of Salmon farms in Marlborough Sounds.

I support the relocation of Salmon farms, because its good for the environment, good for the fish and we are able to produce good fish quality. If we could produce more fish, means more job for us. and I need this job to support my Family.

Heansa

Julie Carter



Written Comment No: 0151

Subject	NZ King Salmon - Relocation of Farm Marlborough Sounds
From	[REDACTED]
To	aquaculture submissions
Sent	Monday, 6 March 2017 12:13 p.m.

I support the process and all the areas identified in the application. Many of the existing sites are not suitable for fish farming and require substitution. The salmon industry in Marlborough is well established and recognise the requirement for a sustainable business. Marlborough requires sustainable industries to support the working people of Marlborough who contribute to the vibrant economy. Aquaculture is an exceptional NZ industry, world leading and will provide for the 100's of employees and their families.

There are sufficient requirements within the application to manage environmental effects of the Salmon Farms.

I also own a bach in the Kenepuru Sound and our family has been there since 1967.

I support:

- Blowhole Point North
- Blowhole Point South
- Richmond Bay South
- Horseshoe Bay
- Waitata Mid-channel

Bruce Cardwell
ph [REDACTED]

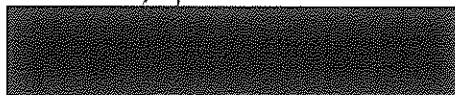
Relocation of Salmon Farms
in the Marlborough Sounds.

Written Comment No: 0111

Submission from Betty Carson.

I have been employed by "New Zealand King Salmon" for over 6 years. They have very high health and safety standards, and take our environment seriously. I believe this moving of the farms will be very good for the sea floor health, and a bonus will be more work for years to come, enabling more people to have job security.

Betty Carson



23-02-17

Submission form for the Relocation of the NZKS Salmon Farms.

Written Comment No: 0106

My Name is: Bawi Len Ta Cang

I am writing in to show my support for the Relocation of the Salmon farms.

This will make it better in my work as there will be more Salmon of a better quality.

So I will have a job for years to come & my kids will have a chance to have the same experience.

Bawi Len Ta Cang

Bawi

23/02/17.

Written Comment No: 0319

Subject	Emailing - 170306-SubmissionForm.pdf
From	<u>crihcawood</u>
To	aquaculture submissions
Sent	Thursday, 23 March 2017 4:57 PM
Attachments	<<170306-SubmissionForm.pdf>>

Please find attached submission form.

Written Comment No: 0319

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: 0319

**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	Charles Richard and Jane Helen Cawood		
Address	<div style="background-color: black; width: 200px; height: 40px; display: inline-block;"></div> Timaru, St Cant		
Email	<div style="background-color: black; width: 200px; height: 20px; display: inline-block;"></div>		
Telephone (day)	<div style="background-color: black; width: 100px; height: 20px; display: inline-block;"></div>	Mobile	<div style="background-color: black; width: 100px; height: 20px; display: inline-block;"></div>

<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 <div style="background-color: black; width: 150px; height: 20px; display: inline-block;"></div>
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The Marlborough Sounds needs proposals for protection and restoration of its natural environment and marine ecosystem, **NOT** proposals for further exploitation and degradation such as this one.

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

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

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

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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.

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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:

Profit for a select few should not be a policy of any government when it comes to negatively impacting the environment and natural beauty of an area.

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

Written Comment No: 0317

Subject	Salmon Farm Relocation
From	Craig Chapman - Signs Now
To	aquaculture submissions
Sent	Thursday, 23 March 2017 4:48 PM

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

aquaculture.submissions@mpi.govt.nz

To: The Salmon Relocation Advisory Panel

From: Craig Chapman
Signs Now
Director

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.

With thanks,

Signs Now offers a COMPREHENSIVE & PROFESSIONAL SIGNAGE & IMAGE PACKAGE.

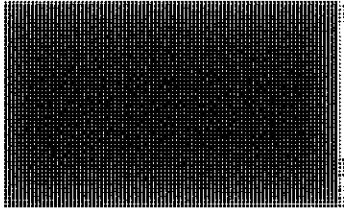
This includes:-

- Corporate & Business logo Design (adaptable for all potential applications)
- General Signage (External & Internal)
- All manner of Vehicles (land, sea & air)
- Large Format Digital Printing
- Brochure, Business Card & Website Design
- Winery & Vineyard Signage
- Totally out-there & novel concepts etc

This is but a small sample of the many services we provide.
Please feel free contact us about any Design or Signage requirement you are looking for.

Craig Chapman





Piston 7220

11

Written Comment No: 0390

Subject	Submission Marlborough Salmon Relocation
From	<u>Frances Chaytor</u>
To	aquaculture.submissions@mpi.govt.nz
Sent	Monday, 27 March 2017 5:21 PM
Attachments	<<Potential Relocation of Salmon Farms in the Marlborough Sounds-1.docx>>

Written Comment No: 0390

Potential Relocation of Salmon Farms in the Marlborough Sounds

COMMENTS FORM

Comments closes 5pm, 27 March, 2017

Your details

NAME: Frances Chaytor

ORGANISATION (if applicable):

CONTACT PERSON: Frances Chaytor

POSTAL ADDRESS: [REDACTED] Bleheim

EMAIL: [REDACTED]

DAYTIME PHONE: [REDACTED]

MOBILE: [REDACTED]

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: 27.3.17

Written Comment No: 0390

I OPPOSE the relocation proposal for the following reasons:

Issue

Comment

1. Process

- 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

- 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

Written Comment No: 0390

- 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.
- 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

- 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.

5. King shag

- 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

- This proposal will degrade the Outstanding Natural Landscapes and High Natural Character values of the Waitata Reach.
- 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:

This application is in need of a more balanced and disciplined approach towards the ongoing harm to the sounds environment and in particular to continue ecological health potential rather than decreasing quality of this environment as has happened and has been recorded - caution against economic drivers - It is too important to tourism to degrade the environments do so much to enhance ecology recreation to name two things - very in important to our region of Marlborough to be so short sighted as to use or in this case attempt to push towards misuse

Written Comment No: 0390

I am sending this past the 5 pm deadline as I had difficulty getting this form - the attachment and email together to send in

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.

The potential relocation of the salmon farms in Marlborough Sounds

Bing Chen



Nelson

I have worked at NZKS for 11 years and I like my job. If we move our farms to the new sites in the sounds it will make my job safe and provide more jobs for other people. Our fish will be better quality and we can sell lots more. It will be better for the environment to move the farms to faster flowing water and keep our fish healthy.

Bing Chen

Chen Bing

17/02/2017

Potential relocation of salmon farms in the Marlborough Sounds.

I-Lin Chen (Trista)

[REDACTED]

[REDACTED]

I came to NZ for better life , and I am lucky to have job in King salmon. I'm happy to hear of the relocation of the farms in the sounds because that will be better for the quality of the salmon and the environment. We will grow more fish and support more jobs. With sustainability of aquaculture , my kids and next generation will have food and a healthy environment for the future.

Signed I-Lin Chen (Trista)

Trista 16.2.2017

Written Comments No: 0419

Subject	Salmon farm relocation
From	Otanerau Farm
To	aquaculture submissions
Sent	Friday, 24 March 2017 6:33 PM

To: The Salmon Relocation Advisory Panel

I support the salmon farm relocation process because NZKS.

- currently employs 300 plus staff in the Nelson/Marlborough region, not to mention satellite companies that contract to it. The chance to grow and employ more would be great for the regions, The loss of jobs could hit regions hard.
- supports the communities- they've donated prizes to my children's schools and student exchange fund raises.
- is pro-active in protecting the environment quality that their farms are in. (Marlborough sounds)

Regards

Michael Cheshire

Shift supervisor

(25 years on salmon farms)

--

Otanerau Seafarm

Queen Charlotte Region

www.kingsalmon.co.nz

Relocation of Salmon Farms in Marlborough Sounds

Choi Ling Chiu



I have been working at NZKS for just over a year. I think the farms should be moved to high flow areas because the fish will be healthy and better quality. This will show the world that Salmon from the Marlborough sounds is the best of quality and this will be good for sales. There will be more job opportunities for the people of NZ. It will be better for the water in the sounds with not as much fish poop under the farms contaminating the water.

NAME : CHOI CHIU LING

SIGN : Ling

Date : 22/02/2017

Relocation of Salmon Farms in the Marlborough Sounds

Phaktra Jackson Chrin



I think we need to move our fish farms to high water flow and support this because we will get good quality salmon and it will be better for the environment to have our farms out of the slow moving water. It will be better for the seabed and the water quality. It will also mean more jobs created for Marlborough and Nelson. I will have a secure job to feed my 5 children and bring them up in a healthy country.

A handwritten signature in blue ink, appearing to read 'Phaktra'.

21.02.2017.

Written Comments No: 0145

Subject	Relocation of Salmon farms in Marlborough
From	[REDACTED]
To	aquaculture submissions
Sent	Thursday, 2 March 2017 4:47 p.m.
Attachments	<<Potential-Relocation-of-Salmon-Farms-in-the-Marlborough-Sounds-Feedback-form- Word-version.docx>>

Attached is my completed feed back form for the above.

I do not wish to speak before the advisory panel

My submission is as a recreational fisher and I support the proposal to relocate the designated salmon farms in the Marlborough Sounds

Robert Ian Christison

[REDACTED]

[REDACTED]

Nelson

[REDACTED]

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.

Written Comments No: 0145

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?

I support the proposal to relocate the six salmon farms

Question 2:

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

All the sites appear suitable

Question 3:

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

All the low flow sites

Question 4:

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

I do not have concerns with the proposed sites and believe long term they will benefit recreational fishing which is my interest

Question 5:

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

Easier to maintain the new best practice standards as well as less effects on the water table because of the higher water flows.

Question 6:

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

No

Question 7:

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

Yes

Question 8:

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

No

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?

These sites should be closed to marine farming for a period of time. Any new activity should be subject to the new regulations

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?

Yes 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

Question 12:

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

I agree with the proposed regulations

Question 13:

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

No

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?

They are all equal

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

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?

Overall the water quality in the sounds will be improved because the relocation sites are in higher water flow areas. Compliance with the new best practice standards will be made easier for NZKS

Question 20:

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

No

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?

This will be controlled by monitoring and any issues identified will be remedied

Question 24:

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

As above.

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?

No

Question 28:

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

Not to my knowledge

Question 29:

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

No

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?

Yes.

Question 32:

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

The higher water flow should be better for overall salmon health

Question 33:

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

No

Question 34:

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

Suitable navigational equipment will be needed and charts will need to be clearly marked. Other than that no problem

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?

There is no problem with the proposed changes but there is also an opportunity for a tourist venture

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?

Question 37:

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

No

Question 38:

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

No

Question 39:

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

No

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?

Change in traffic flows to the old site and increased traffic at the new sites

Written Comments No: 0145

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

It's pretty simple really, the poorer lower flow sites currently operated by NZ King Salmon are relocated without increasing any space to locations that are deeper and with better currents far better for growing the fish.

The benefits are a better environmental, social and economic outcomes, a win win for all.

Written Comment No: 0197

Relocation of salmon farms in the Marlborough sounds.

I agree with moving the farms to high flow sites because our salmon will grow up healthy and we can grow more. It will mean more jobs for New Zealand and will be better for the environment. I will have job security.

Van Lian Chum



27.02.17

Van Lian Chum *Amey*

Written Comment No: 0568

Subject	MPI salmon farm relocation proposal - Andrew Clark personal submission
From	Andrew Clark
To	aquaculture submissions
Sent	Monday, 27 March 2017 3:37 p.m.
Attachments	<<AC Submission MPI re Salmon relocation initiative.pdf>>

Dear MPI team

Attached is my personal submission on the farm relocation proposal

Regards

Andrew

--

Andrew Clark, Chief Financial Officer



M: [REDACTED] | W: www.kingsalmon.co.nz | A: 93 Beatty Street, Tahunanui, 7011



ŌRA KING

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The best opportunity for the Top of the South in a generation?

Submission by Andrew Clark

I make this submission in **FULL SUPPORT** of the Minister for Primary Industry's initiative to relocate salmon farms in the Marlborough Sounds by moving from existing low flow sites to new high flow sites on a like for like surface areas basis, that will enable:

- Further improvement in environmental outcomes from salmon farming, which is already one of the most efficient forms of protein production from a feed efficiency and carbon impact perspective
- Reduced impact on other users of the Marlborough Sounds
- The opportunity for improved fish health and performance through better waterspace, and the possibility to create business and employment growth in the Top of the South community.

Background

I am the Chief Financial Officer of NZ King Salmon, a position I have held since 2011. Prior to that I spent many years in the dairy industry, living and working in NZ, the US, Venezuela, Uruguay, as well as having lived for short periods in Australia and Russia, and significant involvement in business activities in other countries in Latin America, South East and North Asia, and Europe.

This is my **personal** submission.

I am married with two teenage daughters, and we are privileged to live on a "lifestyle" block just outside Nelson. I am a trustee of the Fifehire Foundation, a Nelson / Tasman based charitable foundation helping local families in crisis.

My vision for New Zealand and why the salmon farm relocation proposal is important

My experience in living and working overseas has made me incredibly proud of NZ and what we can achieve on the world stage. It has opened my eyes to the points of difference we inherently have in our food and beverage production, and underlined the importance of telling our story, branded positioning and premium pricing. In my view there remains a massive opportunity for NZ businesses to tell that story internationally and thus achieve premium returns and standard of living, rather than all too often selling ourselves short for commodity returns.

The potential relocation proposal aligns very well with my personal vision for what New Zealand should be – a country punching well above its weight internationally, proud of the clean, green image, the fine food and wine we produce, the beautiful scenery, the friendly and enthusiastic people, getting on and achieving great results using a practical and pragmatic approach, whilst caring for our heritage and environment. A country people enjoy living in, for all that it offers.

That's the New Zealand I have in my mind, and when I'm talking to people overseas that's what I tell them our country is like. In my view this proposal will further improve that image, via improving environmental outcomes, through creating a stronger Top of the South community, and continuing to grow branded, premium priced exports of what I see as the finest seafood money can buy.

Marlborough already has a good profile as the one of the world's finest producers of wine and food – but this proposal will allow us to significantly reinforce and grow that profile over time. By improving the environmental outcomes from salmon farming and thus allowing achievement of Best Management Practice guidelines, the potential relocation proposal will further improve Marlborough and New Zealand's credentials as top producer of wine and food.

Written Comment No: 0568

Last week I was in the US meeting with customers and prospective customers. They love the story of where our salmon comes from, and the care that we take in growing and preparing the salmon. Many times there were unsolicited comments around how fine a product it is, and the special perceptions of our Ōra King brand.

My own situation

We moved just over a year ago to a 7 ha lifestyle block adjoining the estuary near Nelson. Formerly a deer stud, it was in grazing paddocks with a few large old pine trees and various fruit trees. In the last year we (with some assistance from woofers – mostly young Europeans or Asians visiting New Zealand and enjoying the beautiful scenery we have!) have planted more than 2,500 native plants, including pohutukawa, kauri, rimu, totara, miro, flax, cabbage tree, pittosporums, grasses, particularly around the ponds on the property.

Last spring, two separate families of paradise ducks successfully reared a number of ducklings on our ponds, as did various pukeko. There has for several years been a trapping program on the local peninsula which is gradually turning the area into a mainland island.

We have fenced our ponds off from livestock, and have been in discussion with the Battle for the Banded Rail project about improving access between the estuary and our ponds in order to provide a better habitat for Banded Rail.

I mention personal circumstances only as an insight into the type of people that we are, and values that are important to us in running NZ King Salmon. There are many others in the company who hold similar values to me and are equally passionate about New Zealand, the environment and our salmon.

Increasing understanding of our environment

To realise the wonderful business opportunity for our salmon requires access to high quality natural resources and environment, and for that environment to be carefully stewarded for the generations to come.

In the case of salmon farming, the environmental requirements were not well understood around 30 years ago when the first licenses were issued, nor was the technology as well advanced as it is today. Some of the existing sites are therefore located in areas that are suboptimal for environmental guardianship as well as economic performance. They were largely converted mussel sites, and it is now understood that optimum growing conditions for mussels are not the same as for salmon.

Ruakaka site for example is Marine Farm License #1 in New Zealand – and 30 years ago when it was established, it was not understood what kind of environmental conditions are ideal for growing salmon. We now understand much more about that, as well as having improved technology (such as ability to moor in high flow sites) – I expect that over time technology will continue to evolve such that off shore farming may be a realistic option rather than a quick way to go broke and risk lives.

We constantly look to raise the bar in our performance – and recognise that society generally expects this. Increasing expectations, and increasing compliance costs – the way for us to fund this is through high quality water space, improving fish health and performance, and reducing volatility of earnings.

We see an opportunity through this proposal to implement the Best Management Practice guidelines, which were developed with extensive input from community stakeholders and Marlborough District Council – as well as improve business performance. This kind of opportunity is rare and in my view we should not look back in 20 years' time and sadly regret having missed the opportunity to create more well paid jobs as well as improving the environment.

Written Comment No: 0568

A wonderful opportunity for Top of the South employment

I am passionate about creating opportunities in the Top of the South (and other provincial areas of New Zealand). I grew up in Nelson – at age 17 I couldn't wait to leave and never expected to return, because I saw it as too far from anywhere and lacking job opportunities.

I consider myself privileged to have an interesting and challenging job based in a region that provides great quality of life. My kids will shortly be joining the workforce, and I want them and others' kids to have the opportunity for decent jobs in our region, if they choose. I don't want them to feel they have to go to Australia or to one of NZ's larger cities, just to secure a decent job.

I have personally lived in Auckland, Wellington and Christchurch – and have enjoyed each for their own reasons but I also strongly believe it's important to have the choice about where to live, rather than the necessity – particularly these days when the Top of the South has relatively affordable housing compared to Auckland.

I write this as someone who has made a conscious choice to be in New Zealand after living and working in a number of other countries, as I believe New Zealand is one of the best countries in the world to live. Half of my immediate family lives in Australia, and I seriously considered relocating there before moving from Auckland to Nelson.

I would like to note that jobs we create in NZ King Salmon are good jobs: our starting wage rate of pay is currently 16% above the minimum wage at \$18.25/hour, and will shortly be reviewed. We are currently working with our team members and union to explore whether we are able to achieve paying the Living Wage to all employees – that's \$20.20/hour. Right now we are not quite there – about a quarter of our team members are slightly below but I believe with higher quality water space through this proposal we will realistically be able to achieve this.

Through my work with Fifeshire Foundation I have seen first hand the challenges and impacts faced by households in crisis, often through lack of employment. Good jobs are important for people to live with dignity in a community. This proposal is expected to create some 400 new jobs in the Top of the South over the coming years – that's around 400 more families who will have good jobs and pride in working for a company that produces the world's finest seafood.

Improved quality of waterspace through this proposal will underpin the company's financial stability and improve the ability to invest in our people and our community.

The potential relocation proposal is common sense, and has already been successfully applied in other countries

Last year I visited Norway with an aquaculture industry conference. We were fortunate to travel with a group of Central and Local Government representatives from NZ. We reviewed many aspects of the Norwegian salmon industry, which is about 100x the size of NZ's salmon industry yet has managed to remain quite unobtrusive in the community, and in addition has been able to create significant employment in provincial areas. We met with the Mayor of Rogaland County (the provincial area around Stavanger, which is a significant headquarters region for the salmon industry and also a reasonably sized production area). She outlined the process by which local salmon farms were at times relocated to more appropriate areas better suited to environment, social requirements of the community, and improved fish performance. She was very positive about the combined benefits for stakeholders in the community.

Last week I visited a king salmon producer in Canada, where they talked about the process by which they had relocated a low flow site to a better high flow site, which had provided similar benefits to those anticipated from the current MPI potential relocation proposal.

We need to be careful about fact vs fiction

Written Comment No: 0568

I observed much misinformation during our application for water space under the Environmental Protection Agency's Board of Inquiry process. I was personally involved in that application and it is disappointing to note that there again appears to be people raising information found perhaps using Google searches, that does not stand up to scientific scrutiny and / or is many years out of date, but which is then presented as fact!

I find it interesting that we are effectively most visible in the Marlborough Sounds, due to location of our sea farms. That is also where most opposition comes from – I believe we are seen in very positive light in every other community we operate in. And indeed in Marlborough too by the silent majority – with just a vocal minority making lot of noise essentially against everything New Zealand King Salmon does.

The Marlborough Sounds is somewhat challenging in that a number of people are either absentee bach owners, or have moved to the area for personal lifestyle reasons or to retire, and are arguably less concerned about vibrant regional economies and employment opportunities for their children than others may be. But irrespective, I believe there is a good place for Marlburians to be proud of producing the world's finest salmon alongside its already famous sauvignon blanc.

I mention outstanding natural landscape / character, as landscape matters appear to be an interesting art rather than a science. For example, we may drive along Rapaura Road and think the rows of vines look beautiful, but the reality is that this is a heavily modified landscape. There appears to be much subjectivity in what constitutes outstanding natural landscape or outstanding natural character. Some areas have holiday houses and existing marine farm activities in them. So does that mean an area can be outstanding whilst continuing to have residential or commercial structures? Or can it only be outstanding if those structures were to be removed?

In summary, I believe this is a once in a generation opportunity that we must realise

I believe we have an obligation to be responsible guardians of the water space we have (kaitiakitanga) – society expects more and more. We cannot turn up at the world's finest restaurants with the world's highest priced salmon, and not be looking after our environment. The first or second question a prospective customer will ask in the US is, what certifications do you hold? The best way to achieve Best Management Practice in this area is via high quality water space.

We want to be good neighbours with our community – our long term success depends on the support from the community. Irrespective of their personal views on salmon farming, I would like people in the Top of the South to be proud of the fine wine and food that Marlborough produces, and proud of the contribution this makes to New Zealand's image.

In the current MPI proposal we now have an opportunity to exchange like for like, but achieve a better environmental, social and economic outcome. I cannot personally recall a better opportunity to achieve multiple benefits for all stakeholders, in a nearly 30 year business career!

New Zealand will definitely export something – it will either be fine wine and food, or young people in search of employment. We can choose the former, or the latter. Please make the right decision, for our country's future!

I SUPPORT and urge full approval of this initiative by the Minister for Primary Industry.

I **would** like to appear before the panel to talk to my personal submission.



Andrew Clark. Nelson, 27 March 2017

Written Comment No: 0568

MPI questions

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

Yes – fully support as I believe the proposal will result in improved environmental, social and economic outcomes – a win-win combination that is unusual and rare.

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

All sites – but in particular the proposed Waitata mid channel site due to its expected production capacity, and location away from holiday houses

3. *Which of the existing lower flow sites should be relocated?*

All of the existing lower flow sites

4. *If you have concerns about particular sites, what are they and what could be done to address those concerns?*

No concerns about the sites as such.

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

I believe the proposal documentation does capture these items.

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

I note that NZ King Salmon's corporate submission identifies a number of points in the "Other Matters" section, which I have reviewed and support.

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

Yes

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

This proposal has been put together on the basis of no change to surface area of salmon farms, in order to achieve improved environmental, social and business outcomes. So for this proposal I agree that the surface area should not be increased and I fully support this proposal.

In my view each proposal should be considered on its merits, so the question of increasing surface area of salmon farms is not up for discussion at this point.

9. *If the sites at existing lower flow farms (other than Crail Bay MFL32) are vacated, do you believe that marine farming should be prohibited in those sites or do you think that these sites should remain open to other types of marine farming for aquaculture settlement purposes?*

I don't have a strong view either way – open to community views on what use the vacated sites should be put to.

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

I believe shellfish farming should be permitted to continue, as per the consent currently held by the consent-holder.

Written Comment No: 0568

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

Yes

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

Refer to NZ King Salmon's corporate submission, which highlights in "Other Matters" some suggested changes.

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

No

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

- Crail Bay MFL32
- Crail Bay MFL48
- Forsyth Bay
- Otanerau
- Ruakaka
- Waihinu Bay

I base this order on my direct knowledge of the sites' fish performance and productivity, economic performance, and expected ability to meet Best Management Practice standards in future.

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

No additional points.

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.

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

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

No

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

Water quality expected effects have been modelled as part of this proposal. Ongoing effects are subject to comprehensive monitoring and therefore I believe there are appropriate controls in place to monitor and take any required actions.

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

The proposal documentation addresses this appropriately in my view.

Written Comment No: 0568

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

No

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

The proposal documentation already addresses this appropriately in my view.

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

I believe the proposal documentation appropriately outlines monitoring and controls to address any effects.

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

I believe the proposal documentation together with NZ King Salmon's corporate submission comments under "Other Matters" appropriately outlines monitoring and controls to address any effects.

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

No

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

No – dealt with in the proposal documentation

27. *Are there effects on sea birds that you would like the Minister for Primary Industries to be aware of?*

No – dealt with in the proposal documentation

28. *Do any of the sites pose a greater risk to sea birds than other sites?*

I believe this has been dealt with appropriately in the proposal documentation

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

I believe this has been dealt with appropriately in the proposal documentation

30. *Do any of the sites pose a greater risk to marine mammals than other sites?*

I believe this has been dealt with appropriately in the proposal documentation

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

Yes

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

I believe this has been dealt with appropriately in the proposal documentation, but also to note that in my experience working at NZ King Salmon for six years, high flow sites clearly provide better fish health and welfare than low flow sites, particularly during the summer period.

Written Comment No: 0568

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

I believe this has been dealt with appropriately in the proposal documentation.

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?*

My view is that there is no issue. I note that there has been comment in the media around the proposed Waitata mid channel site, and that it may pose a navigational risk being located in the centre of the channel. In my view it will not pose a navigational risk any more than (say) Maud Island, which is also located in the middle of the channel. Smaller vessels, which arguably are more likely to have inexperienced skippers than large craft, tend to keep close to the shore when navigating in protected waters such as the Marlborough Sounds. I am a boatie myself with a small powerboat, and have observed this when boating in Abel Tasman and Marlborough Sounds areas. The proposed Waitata mid channel site would be lit at night and thus provide a navigational benefit compared with the existing situation. The space either side of the proposed Waitata mid channel site is on each side similar to or wider than Tory Channel, which appears to be readily navigable by large vessels, as evidenced by the multitude of interisland ferry crossings without incident on a daily basis.

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?*

I believe this has been dealt with appropriately in the proposal documentation. I also note comments in the NZ King Salmon corporate submission under "Other Community and Flow On Effects" regarding the positive impact NZ King Salmon's salmon farms have on tourism via positive exposure to key influencers such as local and international food media, and top chefs.

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

In my view there is no negative impact on tourism and recreation values from salmon farms. The proposed relocation sites are in general further away from holiday houses so would provide a positive benefit compared with the current sites. The Ruakaka farm in particular is located in an area intended for recreation use, so relocation would provide a positive benefit.

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

I believe this has been dealt with appropriately in the proposal documentation.

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

I believe this has been dealt with appropriately in the proposal documentation. The proposed relocation sites are in general further away from holiday houses so would provide a positive benefit compared with the current sites.

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

I believe this has been dealt with appropriately in the proposal documentation.

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.*

I believe this has been dealt with appropriately in the proposal documentation.

Written Comment No: 0568

In addition, I think the proposal is an amazing opportunity to continue to lift Marlborough's profile as the one of the world's finest producers of wine and food – NZ King Salmon team members are very proud of what we do and want to make the wider community proud too. By improving the environmental outcomes from salmon farming and thus allowing achievement of Best Management Practice guidelines, the potential relocation proposal will further improve Marlborough and New Zealand's credentials as top producer of wine and food.

The potential relocation proposal is likely to improve NZ King Salmon's sales and profitability via better fish performance and production capacity from higher flow sites, which will allow the company to better meet increasing social and community expectations, such as the increasing costs of environmental monitoring, and ability to reinvest in the community for local programs such as nature preservation and education.

The proposal is also expected to lead to greater employment in the Top of the South. I am passionate about offering people choices to work in provincial areas rather than necessarily having to relocate to larger centres such as Auckland, or Australia, in order to find good employment. I write this from a personal perspective as someone with immediate family members living in Australia, teenagers who will shortly be joining the workforce, and as someone who has made a conscious choice to be in New Zealand after living and working in a number of other countries, as I believe it's one of the best countries in the world to live in.

I therefore believe the proposal would be very strongly positive from a social and community viewpoint.

Written Comment No: 0398

Subject	Submission - Rebecca Clarkson
From	<u>Rebecca Clarkson</u>
To	aquaculture submissions
Sent	Friday, 24 March 2017 4:05 PM
Attachments	<<Rebecca Clarkson Salmon Relocation Submission.docx>>

Hi there, please find attached a personal submission from Rebecca Clarkson on the Marlborough salmon relocation proposal.

Please note that I will also be making a separate submission in my capacity as Environment Manager of Aquaculture New Zealand on behalf of Aquaculture New Zealand.

Kind regards, Rebecca Clarkson

Written Comment No: 0398

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

Rebecca Jane Clarkson

Address for Service [REDACTED], Nelson 7010

Email [REDACTED]

Phone Number(s) [REDACTED]

1.0 Introduction

- 1.1 I have a particular interest in the salmon farm relocation proposal because I love salmon and value my family's ability to eat the best salmon in the world, safe in the knowledge that it is grown right here in our backyard.
- 1.2 I am also an employee of Aquaculture New Zealand – however this is my own personal submission and does not necessarily reflect the views of my employer.
- 1.3 My family loves New Zealand King Salmon (NZKS) products, particularly the wood smoked portions that we buy at our local FreshChoice supermarket. We value it for its amazing taste and versatility and particularly for its contribution to our healthy hearts and enquiring minds. My children have eczema and regular consumption of salmon helps that immensely. We much prefer to obtain our Omega 3s from locally grown, edible food products than to pop capsules on a daily basis.
- 1.4 We nearly always have some in the fridge and it's a wonderful go-to for when people come around unexpectedly. It's a great addition to any whipped-up meal, the star of any nibbles platter and a wonderful ingredient for crafting something a little more culinary. We show it off with pride to any friends and family from overseas.

Written Comment No: 0398

- 1.5 I am consistently frustrated by people who seem to derogate the New Zealand salmon industry without any real understanding of the context of its benefits and impacts against so very many of the other products and services that New Zealanders consume on a day-to-day basis. For example, I would choose New Zealand salmon over imported tofu any day. I am environmentally conscious – I buy local and organic whenever I can. Most days I walk instead of using a car. I raise my children to care about and understand the fine balance in our environment. I wholeheartedly support the New Zealand salmon industry as one that all Kiwis should be proud of.
- 1.6 It is also important to note that all of the NZKS staff that I have worked with over the years are genuine, thoughtful people who I trust. They value their jobs with a company that they believe in, based in a region that they love.
- 1.7 I support the submission of Aquaculture New Zealand (AQNZ).
- 1.8 I would not 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 **I do not support Outcome Three** – I believe that the proposal to relocate the salmon farms is positive and well thought out and I encourage the Panel to carefully consider the site swap options and enable as many as is reasonably possible.
- 2.3 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.
- 2.4 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.
- 2.5 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.
- 2.6 Salmon farming is an industry we can be proud of and at the same time be excited about for our future.

Written Comment No: 0398

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 Closing Statement

I understand the New Zealand salmon industry is not perfect – but no food producer is. I do know that it is continually striving to improve and my knowledge of the industry helps me to understand the bigger picture when it comes to the relative impacts of being a Kiwi. The New Zealand salmon industry is one that I can wholeheartedly support. I trust that the Panel will be able to use the substantial evidence before it to make sound evidence-based decisions that recognise the broader context and enable NZKS to continue to improve environmentally while contributing to the social and economic wellbeing of the Marlborough communities in which it operates.



My signature

Subject	Salmon Farm Relocation
From	
To	aquaculture submissions
Sent	Friday, 17 March 2017 11:31 a.m.

My name is Maree Cleal and since 2001 I have been employed by New Zealand King Salmon in a number of roles, my current role being as the Human Resources Manager. During my 16 years with the company I have been supported with development and training opportunities which have enabled me to progress to the position of Human Resources Manager. I enjoy my role and the opportunity to work for a company where I feel my contributions and work are valued and making improvements to the well being of all team members within New Zealand King Salmon. I support the potential salmon farm relocation being proposed by MPI because I believe the salmon farm relocation will provide for better environmental, social and economic outcomes. My understanding is that by relocating the salmon farms to high flow sites from low flow sites, the fish health will improve. This will also decrease the environmental impact of the sea farm on the seabed which will have positive environmental benefits.

An increase in fish health and productivity will have the benefit of providing direct and indirect job opportunities to people within our communities and ultimately result in regional economic improvements, something I also support for my children's future.

In addition to my employment with New Zealand King Salmon, I also own property situated in the Pelorus sounds, specifically Bulwer bay which is currently home to the New Zealand King Salmon Waihinau Salmon Farm. I understand this is considered a low flow site and does not perform as well as other farms in higher flow areas. My family (McCauley) have lived and owned property in the bay since the 1800's, we have raised families there and continue to have strong historical and emotional ties to this area. My family and I spend as much leisure time at our property as we can, our children have also been raised in this environment and do not foresee a time that they will not continue to take advantage of all the things that the Pelorus Sounds region has to offer. A relocation of the Salmon farms from this area would enhance the aesthetics of the bay, it would be lovely to look out of our windows and see the bay returned to its original state without the salmon farm and all associated comings and goings, including the noise and additional vessel movements. I also support that the seabed will return to its natural state with the removal of the farm, this will encourage the natural wildlife to flourish in the bay for the future generations to enjoy.

I would not like the opportunity to be heard by the advisory panel.

Regards

Maree Cleal

Maree Cleal, Human Resources Manager



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Written Comments No: 0249

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