

## Contents Page: O

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

| <b>Written Comments Number</b> | <b>Last Name</b>             | <b>First Name</b> |
|--------------------------------|------------------------------|-------------------|
| 602                            | O'Connell                    | Laurence          |
| 36                             | Oklahoma City Farmers Market |                   |
| 247                            | Oliver                       | Trevor            |
| 396                            | Oliver                       | Sam               |
| 37                             | Olsen                        | Meseret           |
| 194                            | On                           | Tuang             |
| 409                            | Orman                        | Tony              |
| 415                            | Orman                        | Bridget           |
| 161                            | Orora Cartons Limited        |                   |
| 216                            | Overdale                     | Marco             |

# Written Comment No: 0602

Submission on Marlborough Salmon Relocation.

[REDACTED] Dip. Opt. TPA.

Picton RD2 7282  
[REDACTED]

I make this submission as it affects me as a resident of the Marlborough Sounds.

I oppose the Salmon Farm relocation plan. My reasons are as follows.

Impediments to navigation.

Risks of disease in native fish stocks.

Changes of chemistry in the water column that will particularly affect Port Gore and Kenepuru and Mahau Sounds by increasing the risk of toxic algal blooms.

The potential for organochloride and heavy metal contamination and the consequent potential health risks to the community from the large volume of fish food introduced to a relatively small area in the Pelorus Sound.

Seafloor contamination with biologic waste products.

Occupational Health and Safety implications for recreational divers, swimmers and mussel farm workers from increased shark populations.

Preferential treatment for an overseas based enterprise over local marine farmers by allowing industry in areas where development is currently prohibited.

The fact that a government department is sponsoring that which was denied by legal process.

The fact that ongoing deposition of wastes abnegates any value of the land based sewage treatment compliance enforced upon residents, agriculture and industry by local and central government.

The Resource Management Act requires remediation, mitigation and alleviation of adverse effects to the environment. I see no sign of that (personal experience: Crail Bay's abandoned sites are devoid of fish) from the applicants either currently or in the past. I would therefore suggest, in the event consents are granted, a bond be placed in a community trust to protect the environment as incidents present, and allow for seafloor cleaning when the inevitable decommissioning of the farms arises. This should be very very substantial, perhaps in excess of two hundred and fifty million dollars, with investment income contributing to a fund to look after the Marlborough Sounds and its inhabitants, humans included.

Summary:

Benefits from this business flow to an overseas entity, its shareholders and to the NZ government via taxes.

## Written Comment No: 0602

Risks of the business and subsequent costs of environmental degradation and loss of amenity are borne by the local community. These risks must be amortised into the cost of any consents granted, hence the large surety.

I reserve the right to speak to these points at a hearing. Most of the above objections are encapsulated within the documents on MPI's website. The science looks robust.

Sincerely,

Laurence O'Connell

26/2/2017

|         |   |
|---------|---|
| Subject | New Zealand King Salmon farm relocation |
| From    |   |
| To      | aquaculture submissions                 |
| Cc      | William McAnally; Lily McAnally         |
| Sent    | Thursday, 23 February 2017 5:19 a.m.    |

To whom it may concern,

Last year while fly fishing ( for two months ) in New Zealand, I was introduced to Ora King salmon. Best I've had since wild Alaskan Kings and maybe just as good. As a landlocked Oklahoman from the United States I'm also lucky enough to still be eating it, as it is available locally.

Salmon farming is pretty much disparaged by the environmental community. There are two exceptions, Atlantic Salmon from the Faroe Islands and Ora King. Both of these fisheries have lauded for environmental mindfulness. New Zealand King Salmon is a source of pride and yet another example of how Kiwi's do it right. The environmental and company benefits are symbiotic and self evident.

I urge you to approve their request. In case you're wondering ... no I didn't vote for trump.

Sincerely,

Burt McAnally  
Owner, Oklahoma City Farmers Market

## Written Comments No: 0247

|         |  |
|---------|--|
| Subject | Relocation of Salmon Farms in the Marlborough Sounds |
| From    |  |
| To      | aquaculture submissions                              |
| Sent    | Friday, 17 March 2017 7:48 a.m.                      |

I am very keen to see a purposeful review of Salmon Farming in the Marlborough Sounds. For so many years there has allowed to be an ad hoc arrangement to Salmon Farming in the Sounds. Salmon Farming is a very important industry in New Zealand and now is the time to review the industry in the Sounds.

I am in agreement for the Industry to be continued in the Sounds and leave it to the experts to enhance the sustainability of the Industry in the Sounds.

Trevor Oliver

# Written Comments No: 0396

|         |                               |
|---------|-------------------------------|
| Subject | Salmon Farm Relocation        |
| From    | <a href="#">Sam Oliver</a>    |
| To      | aquaculture submissions       |
| Sent    | Friday, 24 March 2017 3:26 PM |

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

[aquaculture.submissions@mpi.govt.nz](mailto:aquaculture.submissions@mpi.govt.nz)

To: The Salmon Relocation Advisory Panel

**Sam Oliver, New Zealand King Salmon, Sales and Operations Planning Manager**

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. I believe that the aquaculture industry is the most environmentally friendly way to sustainably produce food/protein.

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.

Kind Regards

Sam Oliver

--

*Sam Oliver, Sales and Operations Planning Manager*



| W: [www.kingsalmon.co.nz](http://www.kingsalmon.co.nz) | A: 28 Bullen Street Tahunanui 7011





Internet e-Mail Disclaimer: All information in this message and attachments is confidential and may be legally privileged. Only intended recipients are authorised to use it. Views and opinions expressed in this e-mail are those of the sender and do not necessarily reflect the views of the company. E-mail transmissions are not guaranteed to be secure or error free and The New Zealand King Salmon Co Ltd accepts no liability for such errors or omissions.



|         |   |
|---------|---|
| Subject | <b>Marlborough salmon relocation proposal</b> |
| From    |   |
| To      | aquaculture submissions                       |
| Sent    | Thursday, 23 February 2017 10:41 p.m.         |

To: [aquaculture.submissions@mpi.govt.nz](mailto:aquaculture.submissions@mpi.govt.nz)

To Who It May Concern

I am writing with regard to the Marlborough salmon relocation proposal and to share with you my view on why I think the site swaps should go ahead.

I have been employed by New Zealand King Salmon since August 2014. I am the Personal Assistant to the CEO. Previously to joining NZKS was aware of (Atlantic) salmon farming in Europe, Scotland and Chile and of the jobs and opportunities that are generated from salmon farming, which positively improves the economic outcomes in those areas and the salmon industry in these countries also has the full support of local residents and government. I was excited to be part of this industry in New Zealand. As my first days and weeks passed at NZKS I was exposed to the difference between salmon farming in those countries and salmon farming in New Zealand; the OPPOSITION, which is resulting in NZKS being unable to grow to it's full potential, the negativity, the narrow mindedness - shocking. I am amazed that there has been so much opposition and such a costly battle for NZKS to grow; the company's growth has such a positive outcome for so many people and for so many different industries in NZ, why is it such a battle to do something so obviously positive. The site swap is essential for the company to continue to produce its outstanding salmon in conditions that are more environmentally sound.

NZKS employs over 350 people in Nelson/Marlborough region! We are providing 350 people with secure employment in Nelson/Marlborough regions and it has a economic cascade effect, positively affecting thousands of people in these regions, creating jobs and keeping the economies growing and developing. Previously to joining NZKS, I have spent over 20 years working in legal and investment banking environments and I can say that NZKS has some of the most passionate and dedicated employees that I have ever worked with. This dedication and passion starts to grow when you start working at NZKS and can see the amazing salmon that we produce. I am so proud to say I am part of this great company. The site swap will secure my and the other 350 (plus) jobs and the new sites will give us the potential to grow even more outstanding quality salmon.

In addition to the fact that NZKS provides over 350 people with secure, well paid employment, farming salmon is the most sensible option to meet the global demand for protein. Our oceans are currently 50% over exploited and it is believed natural fisheries will reach full depletion by 2056. Aquaculture is a solution to this problem and the Marlborough Sounds is the perfect place for the salmon farms. Moving the farms from their current locations, to the proposed new sites, will result in improved fish welfare and health, in addition to a reduced environmental impact.

Yours faithfully,  
Meseret Olsen



Relocation of salmon farms in the Marlborough sounds.

I think moving the farms to high flow sites because is good for the environment, for the company because our fish will be better and healthier and sell more. There will be money for our country and better for us because we will have a job. More jobs for everyone.

Tuang On



*[Handwritten signature]*  
27/02/17

## Written Comments No: 0409

|         |                               |
|---------|-------------------------------|
| Subject | Submission                    |
| From    | <a href="#">Tony Orman</a>    |
| To      | aquaculture submissions       |
| Sent    | Friday, 24 March 2017 5:05 PM |

**I oppose NZ King Salmon being granted approval to its proposal to relocate its salmon farms.**

**I submit:-**

(a) In 2012 King Salmon were granted permission by EPA to increase their number of farms by four. It was controversial and overrode the Marlborough District Council's decision process. It seems incredible King Salmon in 2017 wants to relocate its salmon farms. King Salmon's credibility is very suspect when recently its CEO (Rosewarne) indicated new information/knowledge prompted demanded they relocate.

(b) Government's involvement in the decision-making is of concern. The Ministry of Primary Industry (MPI) has responsibilities to the recreational fishery under the Act not to one majority foreign-owned corporate company.

(c) By its involvement the Ministry for Primary Industries (MPI) in collaboration with King Salmon Ltd will bear overriding the Marlborough District Council's plans prohibiting aquaculture development in the Outer Sounds.

(d) King Salmon occupies public space, and in the Marlborough Sounds, a national recreational fishing and outdoor recreation area of special values.

(e) King Salmon should not industrially "farm" in the Marlborough Sounds. I have personally seen open sea aquaculture around the Coromandel Coast. Open sea farming is far, far more preferable than the enclosed stretches of the Sounds. Despite this King Salmon claim commercial fish farming operations are not done in the open ocean. Again a lack of credibility and honesty is evident.

(f) King Salmon's products is suspect reportedly containing processed chicken with anti-biotic content and colouring for salmon..

(g) King Salmon's farms have suffered a number of fish deaths which have never been satisfactorily explained. Is it disease, or poor management or both?

**These are written submissions.**

Tony Orman  
Journalist/Editor

BLLENHEIM, 7240  
New Zealand

## Written Comments No: 0415

|         |                               |
|---------|-------------------------------|
| Subject | Submission re Salmon Farms    |
| From    | <a href="#">Bridget Orman</a> |
| To      | aquaculture submissions       |
| Sent    | Friday, 24 March 2017 6:13 PM |

24 March, 2017

To MPI  
WELLINGTON

Submission to changes in location of NZ King Salmon Ltd farms in the Marlborough Sounds

I am opposed to any changes in the location of the salmon farms in the Marlborough Sounds to those agreed previously in 2012.

There was robust discussion at the time and much scientific and anecdotal data presented in a full submission opportunity.

The Marlborough District Plan has credibility based on research into it's current habitat and the already allocated space to aquaculture in the Sounds.

The NZ King Salmon Company had done plenty of research themselves and if they have now got it wrong they should have to front up and work to the decisions made. They are occupying public water already and thus preventing the public from those areas.

In this written submission, I repeat I am opposed to relocation of the salmon farms.

Bridget Orman

Blenheim, 7201

|             |  |
|-------------|--|
| Subject     | NZ King Salmon Farms relocation Marlborough Sounds |
| From        | [REDACTED]   |
| To          | aquaculture submissions                            |
| Sent        | Wednesday, 8 March 2017 11:33 a.m.                 |
| Attachments | <<NZKS Salmon Farm Relocation submission.doc>>     |

I would like to submit the attached submission on the proposal to relocate NZ King Salmon Farms in the Marlborough Sounds

Thankyou

**Paul Lewis**

Account Manager

**Orora Cartons**

[REDACTED] Hornby  
Christchurch

[REDACTED] [REDACTED] [REDACTED]  
[REDACTED]

CAUTION - This message may contain privileged and confidential information intended only for the use of the addressee named above. If you are not the intended recipient of this message you are hereby notified that any use, dissemination, distribution or reproduction of this message is prohibited. If you have received this message in error please notify Orora immediately. Any views expressed in this message are those of the individual sender and may not necessarily reflect the views of Orora.



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

aquaculture.submissions@mpi.govt.nz

To: The Salmon Relocation Advisory Panel

My name is Paul Lewis and I am an Account Manager for Orora Cartons Christchurch responsible for managing NZ King Salmons requirements for printed retail packaging and salmon backing boards.

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. Orora Cartons Australasia are proud to supply packaging to NZ King Salmon for their added value smoked salmon product as this is a top quality product which we feel enhances New Zealand's reputation as a country which produces high quality foods produced from a green sustainable environment.

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

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

There will be more direct and indirect jobs created if this proposal goes ahead resulting in economic improvements for the communities in the top of the south and by allowing New Zealand King Salmon to relocate their Salmon Farms in the Marlborough Sounds this will allow them the opportunity of growth which in turn will add employment growth both to NZ King Salmon and the local companies that supply them as well as increasing New Zealand's overseas earning potential.

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

As producers of packaging for New Zealand King Salmon we support this growth and its potential to provide further employment and financial growth for the New Zealand Economy.

I am unavailable to be heard by the hearings panel.

Name: Paul Lewis

Email:

Date: 7<sup>th</sup> March 2017

Phone:

|         |                                    |
|---------|------------------------------------|
| Subject | Salmon Farm Relocation             |
| From    | [REDACTED]                         |
| To      | aquaculture submissions            |
| Sent    | Wednesday, 15 March 2017 2:42 p.m. |

Good afternoon.

I am impressed by the significant positive environmental impacts set out in the proposals to relocate salmon farms in the Marlborough sounds. It appears that both invisible, but negative impacts on the seabed below the existing farms, and visual impact for users of the sounds have been carefully examined.

I note that the relocation of these sites to higher flow areas, while reducing local seabed impact, will use the principle of dilution to disperse any waste material from the farms considerably more broadly. As with the dispersal of CO2 into the atmosphere, this could potentially cause unanticipated long term pollution effects. This does, however, seem improbable as the overall fish stocks around New Zealand are considerably lower than historical levels. It may also allow the farming operations to intensify, up to the point where sea bed impacts might again become a concern, but the adequate monitoring planned mitigates this.

I wish, in any case, to record my **firm support** for the relocation plan, and any necessary amendment of legislation or schedules required for its implementation. In particular I consider that the location of the salmon farms in the sounds should arguably be where they would be positioned if this were a completely new initiative. In other words, leaving them where they are, when we know there are far better locations, would be illogical. We should continue as we should have begun.

Sincerely

Marco Overdale

[REDACTED]

Martinborough, 5711

[REDACTED]

[REDACTED]