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Written Comments No: 0274

Subject	**Salmon Farming in the Sounds**
From	[redacted]
To	aquaculture submissions
Cc	Sales Team
Sent	Tuesday, 21 March 2017 11:07 a.m.

There seems to be a lot of differing standards applied to farming sectors with regard to impact on our environment.

Dairy, sheep, forestry and even salmon farming in Big Glory bay where isolation seems to play it's part in leaning towards and in fact the existence of double standards.

NZ King salmon company are proven operators with a considerable work force therefore providing many jobs and opportunities for locals.

In fact if you applied the environmental compromise, applied this as a percentage to the provision of jobs it would rank very low and very desirable amongst the fore mentioned farming categories.

The impact of a salmon farm has been scientifically documented and NZ King salmon has been through a very rigorous process in recent years, so the data is reliable.

As I see it the better the tidal movement and water flow the better the site so I am in full support of identifying new and more salmon farm sites in the Sounds.

I believe fish farming development to be a positive and viable option for New Zealand and hope that some consistency in all our farming sectors should apply.

Salmon farming has a very bright future and has a low impact profile for the environment, so I encourage positive decision making for this world class industry.

Henk Tabak
[redacted]
Christchurch

Written Comment No: 0066

Relocating Salmon farms in the Marlborough Sounds.

Daven Talamaivao
[redacted]

I think we need to move the farms to the new sites because better environment for the fish to grow. It will give us better quality fish for our customers and we will be able to sell more. The more healthy good quality fish and higher sales will create more jobs. It will give me job security and I am proud to be working here.

21.2.17

Potential relocation of salmon farms in the Marlborough Sounds

Faye Talbot
[redacted]

I have been an employee of NZKS for 11 years. I think it is important for the company to move the 6 farms to the new sites to provide more quantity and better quality salmon. The new sites will be better for the environment. Moving the farms can mean a lot for the Nelson, Marlborough areas by providing more jobs. Marlborough grown salmon is known world wide and if it keeps expanding it will be good for the tourist industry which will bring more money into the top of the south.

Signed Faye Talbot
F. Talbot
16/2/17

Written Comments No: 0533

Subject	**Submission - proposed Salmon farm relocation**
From	Greg Kingston
To	aquaculture submissions
Sent	Monday, 27 March 2017 4:21 p.m.

Good afternoon

Please find below a submission from Talley's Group Ltd regarding the proposed Salmon Farm Relocation.

To: The Salmon Relocation Advisory Panel.

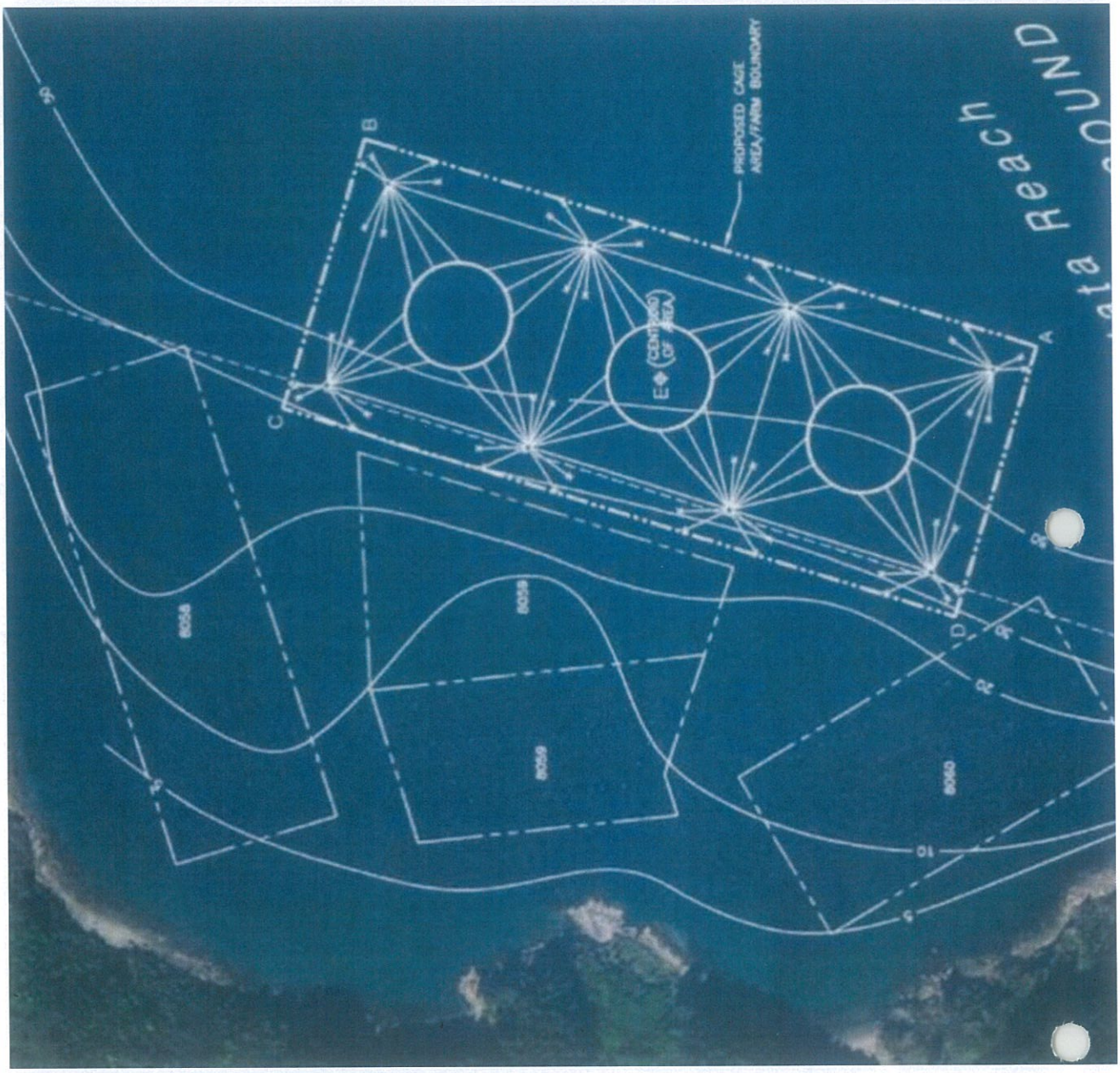
We are the owners of the mussel farm directly opposite one of the proposed Salmon relocation sites (Blowhole Point North).

- This mussel farm 8059 (as shown below) is a key strategic site for us for spat growing. Few farms are capable of growing spat like this farm, thus its importance to the overall mussel program is significant.
- Here we grow out 'Kaitaia spat seaweed'. This activity is crucial to our business, as a reliable source of spat is the foundation stone of the industry.
- The current policy environment in the Marlborough sounds means there is little opportunity for new mussel sites. Therefore the protection of growing characteristics of the limited number of sites available for spat is hugely important to the mussel industry. Not all marine farming space is equal, the benefits enjoyed at this farming location is not found at all sites.
- Our concern is that the location of a Salmon farm immediately opposite will affect water flow and thus the growing characteristics of this mussel 'nursery' farm.
- Our recommendation is not to relocate salmon farms to the proposed site 'Blowhole Point North' due to the potential adverse effects on the marine farms presently operating at this location.
- We would like to be heard by the hearings panel.

Regards

Greg Kingston
Talley's Group Ltd

Written Comments No: 0533



Greg Kingston | Talley's Group Limited, [redacted] New Zealand

Written Comment No: 0057

Re - located of Salmon farms

I supporting re located of Salmon farm because they will give us a good job to help our family.

And I believed that the NDRC is very reliable regards of helping people. On my opinion the new farm will be better to our rivers to have a good quality.

Nathalie Lapinto

[redacted]

Written Comments No: 0225

Subject	**relocation**
From	[redacted]
To	aquaculture submissions
Sent	Wednesday, 15 March 2017 10:57 p.m.

Hello,

to whom this may concern.
I am just sending a quick email to say that I am in favour of the relocation of King salmons farms as I believe this will benefit not only the community but the surrounding area and the heath of the sea beds concerned.

yours sincerely

ryan tattersall

Subject	**Relocation of Salmon farm in the Marlborough Sounds**
From	[redacted]
To	aquaculture submissions
Sent	Thursday, 16 March 2017 7:00 p.m.

Salmon Farm Relocation

Ministry for Primary Industries

Private Bag 14

Port
Nelson aquaculture.submission@mpi.govt.nz

To: The Salmon Relocation Advisory Panel

My name is Sereana Rokube Tawake, I have work for New Zealand Kind Salmon for four years for the role as a hatchery operator in the Canterbury region.

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

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

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

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

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

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

Thank you kindly,

Sereana Rokube Tawake [redacted]

Written Comments No: 0234

16 March, 2017

[redacted]

Written Comment No: 0006

Subject	**NZKS Relocation**
From	[redacted]
To	aquaculture submissions
Sent	Wednesday, 8 February 2017 7:40 p.m.

I fully support the move of NZKS farms to more productive site in Marlborough. If this was done it would be the best thing that has happened for Picton in many years, we need a large company here to offer employment and a future for people in Picton. The opportunities this would create for the wider community to supply services to NZKS can only be a positive outcome, please please please can this make it through this time....we need it more than ever.

Regards Greg Taylor
Picton

Sent from BlueMail

Written Comment No: 0507

Subject	**submission**
From	renee taylor
To	aquaculture submissions; Charmaine Gallagher
Sent	Sunday, 26 March 2017 7:00 p.m.
Attachments	<<submission.rtf>>

Sent from Mail for Windows 10

Written Comment No: 0507

I am a student at NMIT studying a degree in Aquaculture and Marine Conservation. My opinion is that the relocation goes ahead, as this is more beneficial for both the company, and hopefully, in the long term, the environment.

From looking at the documents offered for this case, there are environmental, economic, social and cultural advantages to relocation of the six farms. The environment under the current farms will be given a chance (and hopefully aided by the company involved) to return to a functioning, or its original state. These current sites are located in low flow areas where the footprint of the farm is smaller than the footprint of the relocated sites will be, but much more dense. Therefore relocation of the six farms to high water flow sites will be better for the environment, as the footprint of the farm will be wider, yes, but it will also have less of an impact as it would be more diluted.

The company will continue to lose money and full time employees if it continues to farm at the current sites. By relocating, the company will produce more product, earning more revenue, and more jobs will be available. This would be a positive for any local communities, by producing revenue and creating more jobs in their areas. These are positives for economic, social and cultural sectors.

If the company chose to stay, it would lose money, lose full time employees. Production at the sites would have to decrease. The company would not be abiding by the current benthic community guidelines. The areas under the farms would continue to worsen in condition.

Therefore I stand behind the decision to relocate the six farms to higher flow sites where they can increase production and increase available jobs.

Renee Taylor

Written Comments No: 0354

Subject	**Submission of Te Atiawa o Te Waka-a-Maui Trust**
From	Resource Management | Te Atiawa
To	aquaculture submissions
Cc	General Manager | Te Atiawa Trust
Sent	Monday, 27 March 2017 12:39 p.m.
Attachments	<<Partners-Central Govt-MPI-NZKS Relocation-Submission-Final-2017 Mar 27.docx>>

Please find attached the submission of Te Atiawa o Te Waka-a-Maui on the MPI process to relocate salmon farms in the Marlborough Sounds.

Can you please confirm that this email has been received.

Nga mihi

Bruno Brosnan
Rohe Manager
Te Ātiawa Manawhenua Ki Te Tau Ihu Trust
Beach Road, Waikawa Marina, Waikawa, Picton 7220
(PO Box 340, Picton 7250)
Phone : [redacted]
Fax : [redacted]
www.teatiawatrust.co.nz

TE ĀTIAWA
MANAWHENUA KI TE TAU IHU TRUST

Written Comments No: 0354

TE ĀTIAWA
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Fax : (03) 573 5180
Email : office@teatiawatrust.co.nz
Website : www.teatiawatrust.co.nz

Ki nei kia pā te reira/*to whom it may concern*:

Email:	Aquaculture.submissions@mpi.govt.nz
Postal:	Salmon Farm Relocation Ministry of Primary Industries Private Bag 14 Port Nelson 7042

Tukuna i runga i/*released on*:

Te rua tekau ma whitu o Poutū-te-rangi, te tau 2017
27 March 2017

Taipitopito/*details*:

Title:	To use the Governor-Generals regulation powers (under section 360A of the Resource Management Act 1991) to modify the Marlborough Sounds Resource Management to enable finfish aquaculture in the Marlborough Sounds.
Submitter:	Tēnā koutou, e ana te reo o Te Ātiawa o Te Waka-a-Māui. Haere mai koutou i runga te karanga o te kaupapa. Tēnā koutou, tēnā koutou, tēnā tātou katoa. Archdeacon Harvey Ruru Chairperson Te Ātiawa o Te Waka-a-Māui Trust.
Organisation:	Te Ātiawa o Te Waka-a-Māui Trust.
Contact:	Email: rm@teatiawatrust.co.nz Phone: 03 573 5170 Address: Beach Road, Waikawa Marina Waikawa, Picton. Or; PO Box 340 Picton 7250

Tono tatou e/*We request that*:

Te Ātiawa o Te Waka-a-Māui Trust would like to speak to their written comments at a hearing.

Tukuna kia rere ngā mihi ki te Atua I runga rawa – te tīmatagata me te whakamutunga ō ngā mea katoa.

E kore e mutu ngā mihi ki ngā mate maha mai I ngā tōpito e whā ō te motu, ōtira nō te ao whānui nui tonu. Moe mai I ngā ringaringa kaha ō te Atua.

Kei te iti me te rahi – tātou ko te hunga matatahi ō Te Ātiawa ki Te Tau Ihu – nau mai ki te tāpaetanga ō te wā.

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I roto I to tatou tirohanga/ in our view:

Te Ātiawa o Te Waka-a-Māui Trust, for the reasons outlined below, supports the Governor-General in using her powers under the Resource Management Act 1991 to change the operative Marlborough Sounds Resource Management Plan to enable fin-fish farming in the areas proposed. However, the Trust believes the Governor-General should:

- be considering a more flexible plan modification at Tio Point to enable fin fish farming instead of just salmon (i.e. Expanding the Coastal Marine Zone 2 to accommodate the new farming area instead of changing it to Coastal Marine Zone 3);
- be allowing a wider consideration than a simple New Zealand King Salmon relocation to support the development aspirations of Te Ātiawa.

Ko wai i tātou? / Who are we?

Te Ātiawa o Te Waka-a-Māui Trust (Te Ātiawa) is the mandated iwi organisation that represents the Te Ātiawa people who whakapapa to Te Tau Ihu (the top of the South Island). Te Ātiawa hold manawhenua manamoana across Te Tau Ihu and specifically, in this context, the Marlborough Sounds.

As such, Te Ātiawa iwi members are kaitiaki (guardians) within this rohe and carry a responsibility for ensuring the mauri or essential life principle of the natural world is maintained. Central to this responsibility is kaitiakitanga.

Te Ātiawa has fought long and hard to formulise these long standing rights through various legislative processes and be recognised in its tribal home. While the principles of the Treaty of Waitangi secured the rights of iwi to co-governance and co-management of resources within its tribal areas, it is now accepted that this did not happen. The 20 year settlement process opened old wounds but recognised the injustices of the past and secured an apology and redress. Unfortunately the settlement process required concession and compromise on behalf of iwi for the good (and benefit) of all peoples of Aotearoa. However, what rights were secured through the Deed of Settlement should not be ignored and will be vigorously defended by the Trust.

In short, we represent the Te Atiawa people of Te Tau Ihu. Our people are the holders of the mana and the kaitiaki.

To tatou tāpaetanga/ our submission.

Although our area of influence carries across the entire Te Tau Ihu region, the primary focus of our submission regards the proposed changes that would impact on Totaranui (Queen Charlotte Sound) and Kura te Au (Tory Channel). In regards to the wider changes, the Trust endorses the proposed changes on the basis that:

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- The relocation of salmon farms from low flow sites to high flow sites would have a better environmental outcome;
- The resultant new coastal permits would be issued with modern and comprehensive conditions;
- The resultant monitoring of the salmon farming effects would be under new and stringent environmental controls;
- A clearer and consistent compliance regime would be imposed on the new coastal permits that are consistent with the Best Management Practice guidelines for salmon farming in the Marlborough Sounds[i]; and
- The relocations would create more job opportunities to bring our people back to the rohe.

To tātou uara/ our values.

The Trust has discussed its cultural values with the Ministry of Primary Industries and read the Cultural Impact Assessment (CIA) provided by the Ministry. While the Trust generally supports the issues and values raised in this report, the Trust feels that it is important for the Advisory Board (and the Governor-General) to recognise the specific values of significance to Te Ātiawa.

As the Ministry's CIA identifies[ii], Totaranui and Kura Te Au are Tino Taonga (principle treasures) and are accorded the highest level of regard in the Iwi Environmental Management Plan of Te Ātiawa. This regard, (and ultimate responsibility) is to the maintenance and enhancement of the mauri and the ecological integrity of these taonga.

Currently, there are two salmon farms operating within Totaranui and three within Kura Te Au. The Totaranui farms were established before the enactment of the Resource Management Act 1991 and are classified as low flow sites. These low flow sites have been shown to be less than ideal for salmon farming. To remove the salmon farms and salmon farming activities from these location would achieve a significant enhancement to the mauri and the ecological integrity of the Totaranui environment (Otanerau and Ruakaka specifically).

Te Ātiawa was present and an eager participant in the review of Salmon farming and the development of the Best Practice Guidelines for salmon farming. This review drew in international experts who showed that salmon farming (and in fact any fin fish farming) could be operated in a sustainable way with minimal adverse environmental impacts providing the right site was selected and the operation was managed properly and responded quickly to thorough and robust monitoring.

Kura Te Au has been extensively researched, modelled and surveyed in terms of its appropriateness for salmon farming. All these reports, studies, and investigations have shown that Tio Point is, subject to proper operation, an appropriate location for fin fish farming. The Trust is satisfied that the modification of the Marlborough Sounds Resource

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Management Plan to enable fin fish farming will not compromise the Tino Taonga value attributed to this site or the wider Kura Te Au.

Te Tukunga/ The Process.
Tio Point has always been and continues to be an important area for our people. Te Ātiawa sought to establish a marine farm at this site in 1999 with the farm finally being operational in 2001. Since that time, the Trust has continually sought to review and refine its aquaculture activities at this site toward higher value species for the benefit of the iwi, providing jobs and financial returns for its people within its ancestral home. In doing so, providing an opportunity to keep our skilled people within our rohe and provide an incentive for our people to return to home.

Therefore it would be wrong for the Advisory Board (or the Minister) to be under the impression that the changing of the Marlborough Sounds Resource Management Plan to enable fin fish farming at the Tio Point site is only possible to allow the relocation of existing New Zealand King Salmon low flow sites.

The Trust was engaged in the Ministry process well after discussions were initiated between the Marlborough District Council, New Zealand King Salmon, and the Ministry regarding new sites for salmon aquaculture. Our engagement in this process was never from the point of view of solely being a relocation site, but of a potential relocation site or a standalone fin fish farming site. In fact, our aspirations were always to pursue our own plan change for this area. However, given the Ministry's investigations, it was logical that Te Ātiawa participate.

Whilst we are open to a relationship with New Zealand King Salmon, if this is not possible then Te Ātiawa would like to have the opportunity to pursue its own finfish activity at the Tio Point site. However, there is a preference among our people to explore native (and/or) local species at this location, hence a change to Coastal Marine Zone 3 would not facilitate this but an expansion of the Coastal Marine Zone 2 (to incorporate the boundaries of the farming and anchoring structures) would. Therefore we request that the advisory board/Governor-General consider a change that would allow flexibility in which species of finfish can be farmed at this site.

Ta tātou e kua riro/What we have been promised.
Te Ātiawa has been resident in Totaranui (Queen Charlotte Sound) for over 180 years. By the 18th century Te Ātiawa fishing techniques/practices had become well established and were managed to provide a sustainable food source and for commercial trading purposes.

These interests have been recognised in the Treaty of Waitangi and aquaculture settlement processes in which traditional food gathering, economic trade, and the wider marine environmental quality practices of Te Ātiawa have been recognised and actively provided for.

Te Ātiawa interests are further defined in the Maori Commercial Aquaculture Claims Settlement Act 2004 (the Act) which resulted in a Regional Aquaculture Agreement for the

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Marlborough region. As part of this agreement, aquaculture settlement areas (81 hectares) within Marlborough were '*set aside*' for iwi as the 'only space' available in this region left for aquaculture. The gazettal of these areas is reported in the Maori Commercial Aquaculture Settlement New Space Plan as being the result of '*.....close consultations with relevant councils, iwi aquaculture organisations, the Trustee, industry and other interests'*. However, the extent of investigation was not to the degree undertaken in the current relocation proposal. It is highly probable that many of the finfish sites in the settlement areas will not be feasible and will not pass closer scrutiny. In which case, the sites proposed under this relocation process will be the only remaining feasible finfish aquaculture sites.

The Trust understands that the 'settlement areas' and the relocation sites will still be required to proceed through the Resource Management Act consent process. However, in the case of the relocation sites, all the required scientific work has been undertaken by Crown agencies. The same cannot be said for the settlement areas and it is for iwi to undertake the necessary scientific work, in the specified areas to first identify whether the activities will be feasible, let alone to see if the activities '*provided for*' will be sustainable.

This inequality between the investigations provided (by a Crown agency) to an overseas company as opposed to the indigenous people of Aotearoa, cannot be ignored and must be addressed by the Crown and this process. In addition, this inequality risks a long established Te Ātiawa aquaculture site to be overtaken by a Te Tau Ihu treaty grievance process. Hence it is critical that the Advisory Board recognise that the Tio Point site is separate and distinct from the New Zealand King Salmon relocation process.

Hoatu mātou tautoko mō/ *We give support to*:
In broad terms, the Trust supports the Governor-General to use powers under section 360A of the Resource Management Act 1991 to modify the zoning of the locations specified in the operative Marlborough Sounds Resource Management Plan, in the interest of maintaining and enhancing mauri and ecological integrity of the Marlborough Sounds; except that:

- The Tio Point site (as proposed) within Kura te Au remain zoned Coastal Marine Zone 2 but expanded to the new boundaries of the farming area;
- The Advisory Board (and the Minister) make it clear that the Tio Point site is of significance Te Ātiawa and should not be solely considered in terms of a New Zealand King Salmon relocation site; and
- If only one salmon farm is to be removed from Totaranui/Queen Charlotte Sound, then the Otanerau farm be removed.

I roto i ngā whakamahere/*Planning provisions.*
The Trust has read and understood the planning analysis of Montgomery Watson Hazard in the report entitled '*Relocation of existing lower flow Marlborough Salmon Farm sites'.* The Trust is disappointed that the report merely identifies relevant planning objectives and policies (especially regarding cultural matters) rather than providing a thorough analysis.

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In addition, the analysis does not provide a description of the relevant objectives and policies in relation the relevant Iwi Management Plans of the areas. Instead, dismissing such analysis to a cultural impact assessment. Such is deficient as Cultural Impact assessments are separate processes for a different purpose.

Iwi Management Plans are required to be '*taken into account*' for any proposed plan change process (section 66 and 74 – RMA) undertaken by a Council. Whilst the Trust recognises that the Governor-General regulation powers and process (Section 360A and 360B) are not explicit in requiring such an analysis, the Trust believes that such an analysis is at least implied under section 360B.

In the opinion of the Trust and with respect to Kura Te Au, had the planning assessment analysed the cultural provisions of the Marlborough Sounds Resource Management Plan, it would be apparent that the plan supports the inclusion of iwi in the use, development and protection of all resources within the area.

Also, in the opinion of the Trust, had the planning assessment analysed the cultural provisions of the Te Ātiawa o Te Waka-a-Māui Iwi Environmental Management Plan (IEMP), it would be apparent that the IEMP generally supports the removal of problematic aquaculture activities and the establishment of sustainable aquaculture provided it is of benefit to: Waahi Tapu; Waahi Taonga; Te Moana; and Iwi, hapu and whanau; including reinforcing Tino Rangatiratanga and Kaitiaki.

E tata tapahi, e roa te whakatu.

(It takes a long time to repair the harm caused by a rash act)

---

[i] Best Management Practice guidelines for salmon farms in the Marlborough Sounds: Benthic environmental quality standards and monitoring protocol (November 2014). Benthic Standards Working Group.

[ii] Management of salmon farming in the Marlborough Sounds Cultural Impact Assessment (January 2017). Report prepared by Maximize Consultancy for the Ministry of Primary Industries.

Subject	**SUBMISSION ON THE POTENTIAL RELOCATION OF SALMON FARMS IN THE MARLBOROUGH SOUNDS**
From	Laws Lawson
To	aquaculture submissions
Cc	Laws Lawson
Sent	Monday, 27 March 2017 4:33 p.m.
Attachments	<<Letter from Marlborough iwi to Chair Proposed Salmon Farm Relocation Panel 27 March 2017.pdf>>

Tena koe,

Attached please find a submission prepared by Te Ohu Kaimoana as the corporate trustee of the Maori Commercial Aquaculture Settlement Trust on the instruction of the mandated representatives for the 8 Iwi Aquaculture Organisations (IAOs) that represent the Mandated Iwi Authorities on aquaculture matters for 7 of the Te Tau Ihu iwi and Ngāi Tahu who all have tribal interests in the Marlborough Sounds.

Can you please confirm receipt of this submission?

Can all correspondence associated with this submission please be directed back to Laws Lawson at the attached email address in the first instance?

Naku noa, Na

Laws Lawson
Principal Advisor
Te Ohu Kaimoana

[redacted]

Written Comment No: 0515

TE OHU KAIMOANA

MĀORI FISHERIES TRUST

27 March 2017

The Chair
Marlborough Salmon Farm Relocation Advisory Panel
Salmon Farm Relocation
Ministry for Primary Industries
Private Bag 14
PORT NELSON 7042

Tena Koe

SUBMISSION ON THE POTENTIAL RELOCATION OF SALMON FARMS IN THE MARLBOROUGH SOUNDS

This submission has been prepared by Te Ohu Kai Moana Trustee Limited, the corporate trustee of the Maori Commercial Aquaculture Settlement Trust on the instruction of the mandated representatives for the 8 Iwi Aquaculture Organisations (IAOs) that represent the Mandated Iwi Authorities on aquaculture matters for 7 of the Te Tau Ihu iwi and Ngāi Tahu who all have tribal interests in the Marlborough Sounds.

The iwi of Te Tau Ihu include:

- Ngāti Apā ki te Rā Tō
- Ngāti Koata
- Ngāti Kuia
- Ngāti Rārua
- Ngāti Tama ki Te Waipounamu
- Ngāti Toa Rangatira and
- Rangitāne o Wairau.

In addition, Ngāi Tahu has interests in Marlborough.

The combined iwi wish to record that they hold very significant concerns with the proposal that the Minister in charge of Aquaculture use his powers under Section 360A of the Resource Management Act to change the Marlborough Sounds Resource Management Plan to enable King Salmon Limited to relocate up to 6 salmon farms from their existing consented sites to alternative locations.

This submission is not to be read to contradict or detract from any submission directly received from any of the iwi noted above.

The iwi have established a Working Group to act as a co-ordinating point for this process and to work through all the detail to develop a collective view while reporting back to the mandated

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Protecting Māori fisheries assets for future generations

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Email: tari@teohu.maori.nz
Web: www.teohu.maori.nz

representatives for aquaculture for all 8 iwi on a regular basis. The iwi members of the Working Group are Frank Hippolite and Butch Bradley.

The iwi wish to be heard by the panel.

Naku noa na

Dion Tuuta
Chief Executive
Te Ohu Kaimoana

Frank Hippolite
Iwi Working Group member, Salmon Farms Relocation
Chair
Ngāti Koata

Butch Bradley
Iwi Working Group member, Salmon Farms Relocation
Chief Executive
Ngāti Apā ki te Rā Tō

Written Comment No:0500

Subject	**MPI submission**
From	Raymond Smith
To	aquaculture submissions
Cc	David Johnston; Waihaere Mason
Sent	Monday, 27 March 2017 4:41 p.m.
Attachments	<<Final King Salmon submission.pdf>>

Tena koutou, please accept this submission in response to MPI's proposed relocation of King Salmon's aquaculture farms

Raymond Smith
Te Rūnanga o Ngāti Kuia
[redacted] Blenheim 7240
[redacted]

Ngāti Kuia
Te Iwi Pakohe

NGĀTI KUIA
Te Iwi Pakohe

Written Comment No:0500

Resource Management Unit

www.ngatikuia.iwi.nz

The Chair
Marlborough Salmon Farm Relocation Advisory Panel
Salmon Farm Relocation
Ministry for Primary Industries
Private Bag 14
PORT NELSON 7042

SUBMISSION ON THE POTENTIAL RELOCATION OF SALMON FARMS IN THE MARLBOROUGH SOUNDS

Introduction

Te Runanga o Ngāti Kuia Trust Resource Management Unit (TRoNK RMU) is responsible to write submission relating to our kaitiakitanga responsibilities.

My name is Raymond Smith. I hold the position of Environmental Manager for Te Runanga o Ngāti Kuia. I hold a Bachelor's Degree in Iwi environmental management and Trusteeship. I have held the Customary Fisheries Portfolio for 17 years, Resource Manager for the Marlborough region for over ten years was previously a Trustee for Ngāti Kuia. I have had over twenty-five years' experience in area management and environmental development.

Te Whakatau/Ngati Kuia Deed of Settlement incorporates our cultural values of take ahi kaa roa. It is a core part to our cultural identity. We are identified as tangata whenua within the entire Te Tau Ihu region.

Ngāti Kuia tupuna had considerable knowledge of places for gathering kai and other taonga, ways in which to use the resources of the awa and whenua and tikanga for the proper and sustainable utilisation of resources. All these values remain important to Ngāti Kuia today. Te Hoiere was renowned for its natural resources, including fish, kereru, kakapo, tui and pakohe.

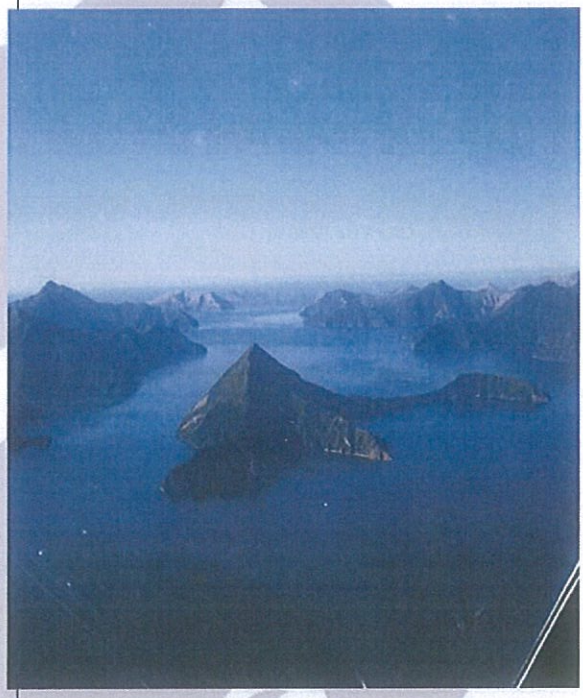
Cultural effects – Ngati Kuia have strategic plans to revive our customary practices and cultural identity in this area, The key driver of resource management for Ngāti Kuia is the maintenance of the mauri of natural and physical resources, and to enhance mauri where it has been degraded by human activity – even though the area has been somewhat degraded by, natural events to date. There is a need as kaitiaki to enact kaitiakitanga as the accumulated effects detract values from our rohe moana.

Ko Matua Hautere te tangata
Ko Te Hoiere te waka

Whakapapa Tatai hikohiko

Te Waharoa o Te Hoiere

Te Hoiere te waka, topetope I Te moana o Kaikaiawaro
I arahina ia ki nga kokoru o te Tau Ihu o Te Waka a maui
Ka hoea te awaka tau ki te wai papaku ko te herenga
Ka piki I a maunganui ki te pinakitanga o parikarearea
I reira ka poua tuahu ki te one, ka poua tuahu ki te rangi
Ka hau ake ko maunga tapu
I tapa ki awa ko Te Hoiere
He wai Maori mo te tinie whakarauika nei



Ko Ngāti Kuia te iwi
Ko Kaikai-a-waro te kaitiaki
He iwi pakohe
He iwi karakia
Te Hei Mauriora

Kaikaiawaro
Matuahautere
Matuakuha
Tukauae
Wainui-a-ono
Kuia

Resource Management Unit
[redacted] Blenheim 7201
[redacted]
[redacted]

Written Comment No:0500

NGĀTI KUIA
Te Iwi Pakohe

Resource Management Unit

www.ngatikuia.iwi.nz

Purpose

The purpose of this submission is to secure a position to provide an overview of cultural values and associated well-beings of Ngāti Kuia. This information will be used as the basis of our verbal presentation to inform the MPI/Crowns selected Board of Inquiry decision making panel in relation to the proposed relocation of 6 existing and extremely degraded King Salmon fin fish farms.

Submission on the proposed relocation of King Salmon Farms relates to;

1. **Key issues**
2. **Cultural effects**
3. **RMA & Ngati Kuia.**
4. **MDC Plan Integrity**
5. **Environmental integrity**
6. **Sustainability and biodiversity**
7. **The Waste Problem**
8. **Sewer Systems in the Sea**
9. **Pollution from Nutrients**
10. **Pollution from Mass Mortalities**
11. **Closing the Net on Waste**
12. **True Value**
13. **Engagement Process**

Ngati Kuia position

- Ngati Kuia is in the unenviable task of upholding the role of kaitiaki tuatahi o tenei rohe
- Ngati Kuia has an environmental obligation, especially at the entrance to Te Hoiere
- Existing Salmon farms must come under BMP guidelines or reduce production
- Ngati Kuia oppose the increased space proposed by MPI and King Salmon
- Ngati Kuia oppose the relocation of existing failed/failing farms to pristine sites at Blowhole North & Blowhole South , Waitata mid-channel , Richmond Bay South, Horseshoe Bay and Tio Point
- Ngati Kuia would like to present issues to the BOI at our Ngati Kuia office,

Naku na

X

Raymond Smith
Taiao MANAGER

Resource Management Unit
[redacted] Blenheim 7201

Written Comments No: 0366

Subject	**Cultural Impact Assessment - Maximize consultancy Ltd**
From	Leana Barriball
To	aquaculture.submissions@mpi.govt.n
Sent	Monday, 27 March 2017 4:22 PM

Tēnā koe
I am making a submission on behalf of Te Rūnanga o Toa Rangatira the Mandated Iwi Organisation for Ngāti Toa Rangatira.

These main submission points support the Cultural Impact Assessment authored by Maximize consultancy Ltd specifically related to the Timeframes and process and the need to continue dialogue between iwi and the Crown on this specific application.

To be better informed more time needs to be taken to understand the potential impacts of this application and to ensure consultation is done appropriately. Ngāti Toa not only have commercial interest in the marlborough sounds but also social and environmental interests to balance the impacts up against all the interests takes time and unfortunately the time available to us within this process was insufficient. If the process from here allowed us to comment on the suggested mitigation measures from a specifically Ngāti Toa perspective that would be the preferred option.

In conclusiion we would like to be further involved to ensure that mitigation measures take Ngāti Toa's interests into consideration.

Ngā mihi

Leana Barriball
Manager, Resource Management and Communications
Te Rūnanga o Toa Rangatira
Waea: [redacted]
Waea pūkoro: [redacted]
[redacted] *Porirua 5240*

Written Comments No: 0263

Subject	**The Potential Relocation of Salmon Farms in the Marlborough Sounds: Feedback form**
From	[redacted]
To	aquaculture submissions
Cc	BARBARA TEMPLETON [redacted] David Templeton
Sent	Monday, 20 March 2017 11:53 a.m.
Attachments	<<Potential-Relocation-of-Salmon-Farms-in-the-Marlborough-Sounds-Feedback-form-Word-version.pdf>>

Dear Sir/Madam

We wish to submit our submission as attached.

Please acknowledge safe receipt of same.

For your information and as requested we provide the following information:

Marlborough Salmon Farms Relocation – Submission
David & Barbara Templeton
[redacted]
Wellington 6012
[redacted]

We confirm that our family owns a property at [redacted]
Mahau Sound

David Templeton AFA
[redacted]

Celebrating 175 years

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.

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.

☐	I would like to speak to my written comments at a public hearing
☐	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?

Yes – emphatically, Yes.

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

All of them

Question 3:
Which of the existing lower-flow sites should be relocated?

All of them

Question 4:
If you have concerns about particular sites, what are they and what could be done to address these concerns?

We assume that you are referring to the proposed new sites: if so, we have no concerns about any of them. That is the whole point of the proposal.

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

No

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

None.

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?

Yes

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?

Prohibited.

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?

Fully prohibited

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?

N/A

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

No – other than to say that any issues we have with the existing low flow sites will disappear once they are relocated and ongoing farming activities prohibited.

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?

No opinion – we are keen to see them all moved and asap

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?

None

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?

None

Question 19:
What are your thoughts on the potential water quality effects at the potential relocation sites?

Much improved from present sites given high flow rates

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 comment – covered in associated reports

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?

No opinion

Question 23:
What are your thoughts on the seabed effects at the potential sites?

Refer Q19 – same here

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

No comment – covered in associated reports

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

No comment – covered in associated reports

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

No comment – covered in associated reports

Question 27:
Are there effects on seabirds that you would like the Minister for Primary Industries to be aware of?

No comment – covered in associated reports

Question 28:
Do any of the sites pose a greater risk to seabirds than other sites?

No comment – covered in associated reports

Question 29:
Are there marine mammals in the Marlborough Sounds that you think may be particularly impacted by this proposal?
No comment – covered in associated reports

Question 30:
Do any of the potential sites pose a greater risk to marine mammals than other sites?

Not in our opinion

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?

No comment – covered in associated reports

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 opinion

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?

No comment – covered in associated reports

Question 35:
Are there particular tourism and recreation values that you would like the Minister for Primary Industries to be aware of at any of the potential sites?

No

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

No comment – covered in associated reports

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

No opinion

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 comment – covered in associated reports

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 comment – covered in associated reports

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?

No comment – covered in associated reports

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

Our family owns a property at [redacted] Mahau Sound.
In this capacity we wish to make the following submission on the matter of the proposed Marlborough Salmon Farms Relocation.

- We **fully support the proposal** as outlined.
- Having read the documentation that your office sent us as well as the extensive related information contained on the various links attached, we are adamant that the proposal should proceed as outlined and have no hesitation in supporting it.
- We believe that relocation of the 6 salmon farms in question –
    - Will ensure substantially improved environmental outcomes from salmon farming in The Sounds.
    - Will improve the social and cultural outcomes from salmon farming in The Sounds by creating new jobs.
    - Will improve economic benefits (regionally and nationally) accruing from salmon farming in The Sounds.

- Key points of benefit arising from the proposal include –
    - Relocation of the 6 salmon farms will reduce the impacts of salmon farming on the marine environment.
    - Moving these farms from their existing low flow water sites to areas of deeper, faster flowing water in The Sounds makes perfect sense at every level.
    - The marine environment will be a clear winner from such a move.
    - In turn, the increased production of salmon that will follow from these farms will provide very real and measureable social & economic benefits both for the Marlborough Region (increased employment and greater investment in both capital expenditure and operating costs by NZ King Salmon) as well as New Zealand.
    - As a publicly listed company, the operator, NZ King Salmon Ltd, now has immediate access to unlimited capital should it require additional capital to fund its operation and the expansion in production that will follow in the medium/long term.
    - We note the Government is committed to building and supporting a strong aquaculture industry in NZ. This proposal fits nicely within this policy mandate and is consistent with the Business Growth Agenda aim to increase the productivity of natural resources while reducing environmental effects at the same time.

    - In short – we see this as being a 'no brainer': the proposal as outlined sees no change in the water acreage to be occupied by the 6 farms, yet by simply moving them to deeper water and faster flowing locations, both the environment and economy will immediately benefit.

Written Comment No: 0198

Relocation of salmon farms in the Marlborough sounds.

I agree with moving the farms to high flow sites because our fish will grow up healthy and fast and we grow more. We will have more jobs for our people in NZ. Better quality salmon for our customers means more sales and this means I have a job to raise my family.

Thivira Thach
[redacted]

27.02.17

Written Comments No: 0026

Subject	**Moving New Zealand King Salmon to new Sounds location**
From	[redacted]
To	aquaculture submissions
Sent	Monday, 20 February 2017 2:38 p.m.

Hello,
I am a NZ resident and am very impressed by the products from New Zealand King Salmon. As a professional chef, I've found there are NO better salmon products in the world. Not only is there becoming a void in the worldwide salmon market, but even the available products are beginning to meet acceptable standards for the world's best restaurants and distributors. New Zealand King Salmon's success creates more enthusiasm, investment, and happy customers around the world.
While the success of New Zealand businesses is important to you, I know that no one wants to sacrifice our environment for the almighty dollar. Things like clear cutting, for example, would fall into this category. New Zealand King Salmon does not. Improving the location for this company by moving to a better location, is better for the health of the fish, and the Sounds, which is due to a better water flow from stronger currents.
While some might find the nets unsightly, tourists, chefs, foodies, and aquaculture enthusiasts find them fascinating. While many locals are averse to the move, we know that many people are averse to change in general. Trying to hinder these inevitabilities, in any sector, would certainly be like swimming against the current.
Anyone that I speak too in the Nelson/Tasman area gives the highest praise of the people who work for this company.
Please do anything you can to help this environmentally conscious business, made up of very good people, selling one of the best products in the world.
Thanks for your time!
William

--
William McAnally
The Historic Oklahoma City
Farmers Public Market
[redacted]
www.okcfarmersmarket.com