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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: 0051

Relocation of Salmon Farms in the Marlborough Sounds

Tial Uk Kham Bik

I have been working for NZKS for 4 years. It will be good if we can move our farms into faster flowing water so we have healthier fish and it will be healthier for our environment. We can grow more fish for customers which will mean more jobs for everyone.

LHJ

20,02,17

Written Comments No: 0297

Subject	Potential Relocation of Salmon Farms in Marlborough Sounds
From	JORGE ULLOA MORALES
To	aquaculture submissions
Sent	Thursday, 23 March 2017 5:48 AM
Attachments	<<Potential Relocation of Salmon Farms in Marlborough Sounds.pdf>>

Sirs MPI

Nelson

Dear Sirs

Please find attached, letter supporting the process mentioned at the subject of this email.

Regards

Jorge Andres Ulloa Morales

Vietnam

Written Comments No: 0297

Wednesday, 22 March, 2017

Sirs

Ministry for Primary Industries
Private Bag 14
Port Nelson – New Zealand

To : The Salmon Relocation Advisory Panel
Reference : Potential Relocation of Salmon Farms in Marlborough Sounds

My name is Jorge Ulloa, New Zealander, I am Marine Biologist with almost 25 years' experience in fish farming mainly in production areas, I have worked in Chile and New Zealand with salmon species, Malaysia with Tilapia, Saudi Arabia and Australia with Barramundi. Now I am working as Global Aquaculture Manager for an American company based in Vietnam.

I am writing this letter to support the MPI process to get the consent to relocate some of the NZ King Salmon farms sites to other areas. Based on what MPI is proposing, I am convinced is the best way to improve and managed the actual situation. There are many aspects that the proposal represents and enhance a better sustainable production, besides increase positively the economic activity in Marlborough area and New Zealand.

Environment:

The idea to move some of the sites to open areas it will help to create a dynamic exchange of organic matter in the ecosystem due to oceanographic process such as under water currents, micro upwelling systems, and water surface movements due to winds and tides.

This supported with the high technology used by NZKS in its production process, such as last generation automatic feeders, the usage of underwater cameras to control the daily feeding activity, equipment that minimize the feed wastage in the process which impact in less organic matter "thrown" to the ecosystem. Besides the support of experienced and technical staff who are committed with a sustainable and clean production.

Aquaculture:

Aquaculture activity is now the biggest seafood supplier to the world, according with FAO more than 50% of the seafood consumed in the world is produced by aquaculture activities, and in the near future this percentage will increase up to 75%, in other hand wild fisheries since mid of '80s has been steady in 90 million tons catch per year with no increase at all in tons captured, even though many countries and international organizations have taken measures and dictate policies trying to increase the stocks of wild seafood, this has failed. An example of this is the quota system which more than to protect the stocks has given secure catch to the big Companies in detriment to the local fishermen in my opinion.

Written Comments No: 0297

The world will have in a few years 1 billion more people, and those people will consume seafood, therefore aquaculture will play a major role as a seafood supplier to the world.

For this reason, this kind of proposal either the increase of licenses number is the way the countries should go to secure seafood supply to the people, and New Zealand is not exempt to this.

Local economy:

This proposal will have a positive impact at the local economy, having a production increase, the needs from NZKS to support the operations is translated in more workforce required, external services for different areas such as transport, net repair, maintenance, etc.

Company:

In my years of experience working in aquaculture in different countries and different production scale companies, it surprises me in a very good way that New Zealand King Salmon has achieved in the last few years something neither big companies around the world have done. They have put in the market a product with high standards of quality and reputation, Ora King. This make a clear difference between NZKS from the rest, because is not just a commodity production Company and always is looking for new ideas to produce value added products. Besides this NZKS has a high presence in the local market which give them an important role in seafood supply for the New Zealanders.

Jorge Andres Ulloa Morales

Marine Biologist

Email: [REDACTED]

Mobile [REDACTED]

Vietnam

Relocation of Salmon Farms in the Marlborough Sounds

Fitu Ulutupu

I have worked for NZKS for 4 years. I agree that we should move the farms to high flow water; it will give us better healthier fish. Our water in the sounds will be healthier and it will be better for the environment and for our people. Better quality fish for our customers. If we sell more fish we will create more jobs for Nelson/Marlborough. We will be proud to be working at King salmon because our salmon will be known as the best in the world. King salmon is a good organisation to be working for because they care for people and the environment. Me and my family are fully committed to the environment and what the company is trying to achieve in Aotearoa.



Fitu Ulutupu.

20-2-2017.

Written Comment No: 0438

Subject	Submission on proposed use of Section 360A of the RMA to allow the relocation of salmon farms in the Marlborough Sounds
From	Irma van der Linden
To	aquaculture submissions
Sent	Saturday, 25 March 2017 7:37 p.m.
Attachments	<<submission king salmon.pdf>>

Dear Sir/Madam

Please see attached my Submission on proposed use of Section 360A of the RMA to allow the relocation of salmon farms in the Marlborough Sounds.

Kind regards
Kees van der Linden

24 March 2017

To: Salmon Farm Relocation
Minister for Primary Industries
Private bag 14
Port Nelson 7042

Submission on proposed use of Section 360A of the RMA to allow the relocation of salmon farms in the Marlborough Sounds

Name of submitter: **Kees van der Linden**
Address: [REDACTED] Picton
Email: [REDACTED]
Phone: [REDACTED]

I am against the proposal to relocate salmon farms in the Marlborough Sounds as proposed by MPI.

Thank you for the opportunity to submit but I won't be available to speak to my written submissions at a public hearing.

However, I hope that this submission provides sufficient information.

I am not against salmon farming per se, but against:

- overruling the Marlborough District Plan by the use of Section 360A-B.
- the current unsustainable system of open cages used in the Sounds and the proposed relocation of open cage farms to other parts of the Marlborough Sounds including areas currently prohibited for aquaculture.
- the limited alternative options provided in the presentation by MPI.
- the disproportional ministerial assistance provided to NZKS together with all promotional marketing power used by NZKS in comparison with the limited inadequate means and time available to most other stakeholders.

The following comments provides background information and viewpoints to explain my position against the proposal and suggestions for your consideration.

1. COMMENTS

- 1.1. The whole process, using ministerial powers to overrule the Marlborough District Plan is undemocratic. It seems driven by years of lobbying by a private company to persuade the government to change and to override the Marlborough Council's planning regulations. By doing so it also undermines present democratic processes, such as for instance the Marlborough Marine future initiative, to establish the future sustainable directions for the Marlborough Sounds.
- 1.2. MPI's intervention, using section 360 A-B of the RMA to shift salmon farms, will most likely damage this kind of important initiatives and eventually will work against finding real integrated sustainable long term solutions for the whole Marlborough Sounds. Local residents will just feel disempowered, loose their trust in the process and consequently give up their support.
- 1.3. The proposal and the blatant one-sided promotional marketing, with questionable statements and promises, currently undertaken by NZKS, leaves little room for real open discussion and identification of possible other economical viable and potentially more environmental friendly options.

- 1.4. MPI seems to have a predetermined economic objective to increase the production of aquaculture in the Marlborough Sounds. However the proposal shifts merely unsustainable salmon farms with all their known and unknown problems into other parts of a sensitive, high valued coastal environment. An environment already under pressure from human activities. This has been acknowledged in MPI's own report *"Our Marine Environment published October 2016"* that states and I quote;

"Of all marine environments, coastal environment is under the most pressure from humans because it is closest to where we live, work, and play. Over decades, coastal habitats have been destroyed or degraded, losing the abundance and diversity of marine life usually found in a natural ecosystem."

And further;

"We have limited national data on the degradation of coastal marine habitats and ecosystems, but we know from scientific case studies and observation that these ecosystems are under the most pressure from human activities. These pressures can interact and combine to have cumulative negative impacts on ecosystems."

- 1.5. Shifting into less affected areas of the Sounds is just shifting problems and putting pressure on that area. Earlier those cumulative negative impacts in the Marlborough Sounds were also, painfully, acknowledged by a report of Marine biologist Rob Davidson in July 2015. It said that, and I quote;

"significant marine ecosystems in the Marlborough Sounds are being degraded or lost at an alarming rate. More than 1431 hectares of sea bed ecosystems, the size of Blenheim and its suburbs, had disappeared in the Sounds since the late 1980s. (within 35 years) Nine sites, ranked as significant because of their biological values, had decreased by 71 per cent."

- 1.6. Council's own coastal scientist Dr Steve Ulrich commented;

"The report had pulled back the aquatic curtain in Marlborough for the first time. Because sites are unseen we are unaware our collective impact is causing severe disturbance and decline of our most significant habitats, of which there are relatively few remaining. If we think about these habitats as Marlborough versions of coral reefs, which are being damaged and destroyed, they need protection and restoration."

- 1.7. Environment Committee Chairman Peter Jerram at that time said as comment on the report:

"the speed of deterioration was startling. We have 19 per cent of New Zealand's coastline and one marine reserve. That's a national and regional disgrace."

- 1.8. Recently an expert panel concluded that, between 2011 and 2016, there was an overall decline of 262.6 ha. of significant marine sites (*Peer review of selected significant marine sites surveyed in 2015-2016*). That is just in a short 5 years time frame. It means that on average every year more than 50 ha of known significant marine sites are disappearing.

- 1.9. It seems that the Minister of MPI nor NZKS has taken very little notice of these reports, and many other warnings about the extraordinary cumulative detrimental impacts already experienced over the years in the Sounds as result of Anthropogenic effects. Many of those impacts has been put before local and national government in the past but the warnings were and still are essentially ignored.
- 1.10. Rather than looking and learning from the past, and see what can be done to protect and restore the disorder and overall decline of the marine environment, the current status quo is frequently used as the new baseline or as the new normal to promote and or assess the impact of this or any other new development proposal in the Marlborough Sounds.
- 1.11. The acceptance of the status quo as the new normal degraded environment is, for example, demonstrated by an article in The SUN dd 15 March 2017 that promoted NZKS's stance on the proposed farm shifts. It is called "*Better for the Sounds, Better for the Country.*" It states that: "*Most of the Marlborough Sounds is soft fine sediment not dissimilar to what you see around Havelock.*" and it suggested that: "*Lower flow farm sites were essentially a fairly common mud flat while being farmed, which revert to an ordinary mud flat after farming ceases.*" and, "*Within a couple of years, a lower flow site will look very similar to what it was before and within 10 years it will be back to its normal state.*" And the article goes on and on underrating and covering up the real issues and facts. It totally neglects the collective impacts that resulted in the substantial decline of most significant habitats in the Sounds as emphasized by Dr. Ulrich and others. NZKS contributed to the collectively further decline of what they call fairly common, ordinary, mud flats returning into its normal state. It should be acknowledged that nor the significant marine sites nor the salmon farms are existing in isolation from each other. The salmon farms are part of the same environment and eventually they must have impact on the declining quality of the wider environment and consequently, the decline of the number of significant sites. At the end of the day even all so called 'minor or minimal impacts' collectively do have an adverse impact on the whole.

2. HIGH FLOW SITE ISSUES

- 2.1. The proposed shift into deeper and higher flow water will not take away all known associated issues with open cage systems. Nor can it be guaranteed to be a sustainable outcome on the long term for the Marlborough Sounds. Especially when taken into account the increasing seawater temperature already observed in summertime. Most likely it will be on the high side of the desired scale of limitations for salmon farming. A logical conclusion will be that accelerating, faster than earlier predicted climate change will certainly become an important concerning factor.
- 2.2. Waste in the form of excess nutrients from food and faeces, most likely in larger quantities than before because of the expected increased production, will still be dumped on the sea floor but spread over a larger area. Other problems, the low flow sites were experiencing, will more or less be repeated. The deep water farms will continue to attract predators like seals, sea lions, sharks, shags etcetera. The caged salmons will still be exposed to possible detrimental external influences, like pathogens, carried by the water and all that lives in it. There will be very little or no control on those externalities.

- 2.3. This was underlined by remarks from a visiting Nova Scotia politician, Mr Colwell. He said that salmon farming in Nova Scotia was dealing with similar environmental issues confronting New Zealand farms and that they also have issues surrounding 'sediment' on the sea floor. Their farms are situated in both the open ocean, and in sheltered bays, each subject to varying tidal flows, and in depths of 150 metres or more. Still the farms are required by law to move sites annually to try and overcome the amount of sediment on the sea floor.
- 2.4. Compare that with MPI's proposal to shift farms into much lesser depths than the Nova Scotia's farms. The so-called proposed deep water sites are only minimal 18m to maximal 80m deep. On average more likely between 30 to 60 meters, and does not include proposals to shift them around. Instead, a monitoring programme on basis of new benthic guidelines need to give an assurance that if a set limit is reached they need to take action. A retrospective approach that is far from satisfactory because history has shown that conditions were more than ones ignored.

3. OTHER ENVIRONMENTAL FRIENDLY OPTIONS

Salmon farming is worldwide going through a process that ultimately favours a more controlled environment above the open cage farms in coastal environments with all its challenges. Not only because of lice and escaped farmed salmon, but also because of a growing awareness of the importance of healthy diverse coastal environments. World wide the overall decline of coastal habitats as result of human activities have resulted in a steady loss of marine species.

3.1. **RAS System**

To counteract this decline, land based Recirculation Aquaculture Systems (RAS) have been developed and have been around for decades now, proving their success for instance in Denmark, France, Canada and Norway.

The advantages are obvious when compared with the open cage farms in coastal areas. Land-based facilities offer the best conditions for salmon. The ideal temperature and water conditions and the absence of environmental threats mean that salmon have a low-stress environment, use feed more efficiently and grow faster than salmon growing in open cages. Land-based systems practically eliminate water pollution, minimize water use, improve product freshness and safety all while increasing the profitability of the businesses. Nutrients that would normally be wasted on the sea floor can be reused for other purposes such as fertiliser in hydroponic culture. Or, as some innovative farms do, recycle water with biofilters. These biofilters are colonies of special bacteria that feed on the waste from the fish and clean the recycled water naturally.

Land-based salmon farms can be strategically located near consumer markets to reduce transportation costs and energy use, while locations near sustainable green energy sources contribute to minimise the carbon footprint. No need of generators. Some reduce the amount of heating and power they need by using energy-saving technologies. Including the heat that is given off by the bodies of the fish as they grow. Of course, this real sustainable solution, requires higher investments but that is off set by better and consistently higher returns and less environmental costs.

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The land-based Recirculation Aquaculture Systems fits in very well with The Zero Waste Economy, Circular Economy or Doughnut Economy. Terms that must be very familiar to people who are taking sustainability issues serious and consider the full spectrum of aspects to be assessed.

3.2. **Offshore Open Ocean System**

Grant Rosewarne said in his opinion article in the SUN dd 15 March 2017: *“NZ King Salmon has thoroughly reviewed the possibility of offshore farming, and whilst we think this will be achievable in about 10 years' time, there is currently not a single commercial operation in a fully exposed offshore location which has proven itself. To go offshore now could lead to a loss of fish, farm and crew.”*

He does not tell us that in Trondheim in Norway the Sintef research institute, Sintef aqua culture and Marinetek, *(The SINTEF Group is the largest independent research organisation in Scandinavia, close to 2000 highly qualified researchers from 50 countries)* have studied open ocean farming for several years and have announced the start of building the first real open ocean system this year and salmon production will start in 2018. They will use an innovative system developed in cooperation with the offshore oil industry. Together they have an enormous amount of expertise with offshore structures in the treacherous North Sea. The Norwegians are very confident that it will be a success with a huge growth potential. The Norwegians are also very keen on safety and health issues for the crews and the fish. So it all seems achievable. Why should it take another 10 years to achieve something similar in NZ?

4. CONSUMER PREFERENCES

- 4.1. Rosewarne also said that *“by about 2034 it was possible King Salmon's farms could produce about 10,000 tonnes of salmon in Queen Charlotte Sound, and 10,000 tonnes in Pelorus Sound.”*

Looking at the overseas developments as described and the objective of the Norwegians to increase productivity 5 times within the next 25 years or so, the NZ salmon production will still be relative small in comparison. Consumers will become increasingly aware of carbon footprints and consumers in Northern America and Europe will most likely start favouring products sustainably grown and produced close to their own market and not those that come from the opposite side of the world and grown in environmentally questionable conditions.

5. SUGGESTIONS/RECOMMENDATIONS

I like to suggest that the Marlborough Salmon Farm Relocation Advisory panel members need to take a cautious approach and consider, in addition to the above background information, the following:

- 5.1. the panel needs to recognise the full spectrum of all human activities that resulted in the decline of the ecological value in the Sounds and acknowledge the need for integrated development limits and goals with the aim to protect and restore, maintain and enhance in order to achieve an effective sustainable balance, acknowledging that economic development is fully dependent on a healthy ecosystem, acknowledging that the 'natural system' and 'human system' are an integral part of each other;

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- 5.2. the aqua culture industry needs to recognise and address the full spectrum of environmental and societal impacts caused by or having impact on its operations. Including the impact of climate change issues and according to the RMA *“examine the extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of this Act”*. If the full meaning and scope of sustainability is taken into account, this should include among other things a full life cycle assessment to establish the carbon and ecological footprint of all aspects of the entire operation including those of possible other options.(for the latter see RMA Section 360B Conditions to be satisfied before regulations made under section 360A, and Section 32 Requirements for preparing and publishing evaluation reports);
- 5.3. it will no longer be acceptable for the industry to place burdens of production, (such as the disposal of waste) onto the wider environment. Environmental problems and conflicts originate from trade-offs between values. It means that according to David Suzuki, *“We should put our focus back on the real world that sustains us, not the world of business and economics”*;
- 5.4. we need, preferably, move towards closed on-land production systems for salmon farming as an environmental friendly, economic viable and social desirable solution. Land based farming is largely dismissed by NZKS because of cost comparisons. The cost comparisons however do need include the full environmental costs, transport/energy costs, and other sustainability aspects applied on the basis of a full life-cycle assessment of the entire operation from construction to consumption of the product and remaining waste;
- 5.5. it will be advisable to monitor closely the offshore system, as currently being constructed in Norway, as one of the possible options for New Zealand. An option that is much closer than 10 years away;
- 5.6. consider that salmon production, from a world social perspective, is not an answer for the world food shortage. In reality it is a luxury product, out of reach for the majority of the world population.

6. CONCLUSION

I like to conclude with the words of Dr. Ulrich who said:

“It will likely demand better integration from various agencies with statutory responsibilities in the coastal space, and effective engagement with iwi, industries and the wider community with interests in the ecological health and resilience of our ecosystems.”

**AFTER ALL IT IS NATURE THAT DELIVERS TO US WHAT WE NEED, BUT IT IS ALSO
NATURE THAT TAKES FROM US IF NEED TURNS INTO GREED.**

Written Comments No: 0525

Subject	Marlborough Salmon Farm Relocation - Submission
From	Robyn Vidak
To	aquaculture submissions
Sent	Sunday, 26 March 2017 8:13 p.m.
Attachments	<<Potential Relocation of Salmon Farms in the Marlborough Sounds.pdf>>

Please find attached a copy of my submission concerning the New Zealand King Salmon Farm relocation expansion.

Robyn Vidak

Mobile [REDACTED]

Potential Relocation of Salmon Farms in the Marlborough Sounds COMMENTS FORM

NAME: Robyn Vidak
CONTACT PERSON: Robyn Vidak
POSTAL ADDRESS: [REDACTED] Marlborough
EMAIL: [REDACTED]
DAYTIME PHONE: [REDACTED]
MOBILE: [REDACTED]

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

To: aquaculture.submissions@mpi.govt.nz

I OPPOSE the relocation proposal for the following reasons:

Issue

1. Process

Comment

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.

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

I dispute the accuracy of Minister's statement: "This proposal is about making better use of existing aquaculture space. There is no proposed increase in the total surface structure area used for salmon farming in the Marlborough Sounds," – Nathan Guy, Minister of Aquaculture.

The proposed relocation sites are not "existing aquaculture space". They are **prohibited** to aquaculture.

While farm surface area may remain about the same, there is a proposed five-fold increase in fish feed to 24,600T a year.

With more feed and more fish, the amount of nitrogen pollution discharged into the Sounds through salmon faeces would also increase. The high-flow farms would be discharging the equivalent of the nitrogen in sewage from a city the size of Christchurch, straight into the sea.¹

Residents must meet strict obligations to keep waste out of the enclosed waters of the Sounds. Yet this proposal would allow the untreated discharge of polluting nutrients from six new salmon farms.

As a land-based comparison of low flow and high flow sites, it is not OK for a dairy farmer who has been pulled up for discharging effluent into a small stream to resolve the issue by increasing his herd and discharging to a faster river.

4. Offshore Alternatives

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.

¹ BOI [par 379] Nitrogen equivalent calculations

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. ²

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

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.

Comment:

The Marlborough Sounds should not to be used by New Zealand King Salmon to expand their destructive practices. As stated, the sites that New Zealand wish to expand into are Prohibited to aquaculture. Any expansion of Salmon Farming should take place off-shore.

In conclusion:

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

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

Written Comments No: 0368

Subject	Salmon Farm Relocations/Marlborough Sounds
From	Phil Vining
To	aquaculture.submissions@mpi.govt.nz
Sent	Monday, 27 March 2017 9:32 PM

As a long term Sounds boatie and yacht/launch broker of 38 years in Picton I agree with the move of existing salmon farms to higher water flow areas however I disagree with site No 3, mid-channel Waitata. This site is a nuisance and hazard to boaties.

I believe that the site originally applied for in Port Gore is an ideal site and this area should be reloked at. It has no outstanding scenic value, has good water flows and there is minimal use by boaties.

Written submission - I do not want to be heard.

Yours faithfully,
Phil Vining.

[REDACTED]

Picton.

[REDACTED]