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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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Subject	<b>Fwd: To: The Salmon Relocation Advisory Panel</b>
From	<a href="#">Dave Hadfield</a>
To	aquaculture submissions
Sent	Friday, 24 March 2017 12:48 PM

Sent from my iPhone

Begin forwarded message:

**From:** Dave Hadfield <[REDACTED]>  
**Date:** 23 March 2017 at 7:32:17 PM NZDT  
**To:** [aquaculture.submissions@mpi.govt.nz](mailto:aquaculture.submissions@mpi.govt.nz)  
**Subject:** To: The Salmon Relocation Advisory Panel

Dave Hadfield NZKingsalmon Engineering TA

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

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

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

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

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

I will not take the opportunity to be heard by the advisory panel, but I will say that this is something that may impact on our jobs if the relocation does not go ahead.

Dave Hadfield nz king salmon employee

Subject	Salmon Farm Location Swap
From	[REDACTED]
To	aquaculture submissions
Sent	Friday, 3 March 2017 1:41 a.m.

Dear MPI

I would like to make a positive submission to the Marlborough salmon farm swap. I had the opportunity to try Marlborough's King salmon during my trip to New Zealand for my friend's wedding last year and thoroughly enjoyed it.

I believe this proposal is a positive one as it makes sense to move the farms from their current locations if they are unable to meet the environmental commitments and best practice guidelines that have been set out.

In addition to this it appears that the new sites will be in more remote locations which could have a positive impact on the people who have holiday homes in the Marlborough Sounds and also recreational fishermen who sail through the Sounds.

Kind Regards,

Soreya Hakeem

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

Name of Submitter in full Debora Hall	
Address [REDACTED]	
Email [REDACTED]	
Telephone (day) [REDACTED]	Mobile [REDACTED]
<input checked="" type="checkbox"/>	I am against the whole Ministry for Primary Industries (MPI) proposal for "Potential Relocation of Salmon Farms in the Marlborough Sounds"
<input type="checkbox"/>	I would like to speak to my written submission at a public hearing in _____
<input type="checkbox"/>	I do not want to speak to my written submission at a public hearing

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

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

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

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

The Marlborough Sounds needs proposals for protection and restoration of its natural environment and marine ecosystem, **NOT** proposals for further exploitation and degradation such as this one.

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

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

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

### *The Board of Inquiry drew the limits*



## Written Comments No: 0321

Subject	<b>Submission on proposed use of Section 360A of the RMA to allow massive expansion of salmon farming in the Marlborough Sounds.odt</b>
From	<a href="#">Debora Hall</a>
To	aquaculture submissions
Sent	Thursday, 23 March 2017 5:38 PM
Attachments	<<Submission on proposed use of Section 360A of the RMA to allow massive expansion of salmon farming in the Marlborough Sounds.odt>>

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

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

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

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

### ***The best Place for Salmon Farming?***

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

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

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

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

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

Other Comments: absolutely No way , No Salmon Farms, no fish feeding facilities that damage any part of the foreshores/ sea beds/ other shellfish or fish/ bird species in our beautiful Marlborough sounds and absolutely NOT in residential zoned areas.

## Written Comments No: 0321

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

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

Email before 5pm, Monday 27 March 2017  
to:  
[aquaculture.submissions@mpi.govt.nz](mailto:aquaculture.submissions@mpi.govt.nz)



## Written Comments No: 0324

Subject	<b>Submission on proposed use of Section 360A of the RMA to allow massive expansion of salmon farming in the Marlborough Sounds.odt</b>
From	<a href="#">Debora Hall</a>
To	aquaculture submissions
Sent	Thursday, 23 March 2017 5:39 PM
Attachments	<<Submission on proposed use of Section 360A of the RMA to allow massive expansion of salmon farming in the Marlborough Sounds.odt>>

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

Name of Submitter in full Keith Hall	
Address [REDACTED]	
Email [REDACTED]	
Telephone (day) [REDACTED]	Mobile [REDACTED]
<input checked="" type="checkbox"/>	I am against the whole Ministry for Primary Industries (MPI) proposal for "Potential Relocation of Salmon Farms in the Marlborough Sounds"
<input type="checkbox"/>	I would like to speak to my written submission at a public hearing in _____
<input type="checkbox"/>	I do not want to speak to my written submission at a public hearing

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### *The Board of Inquiry drew the limits*

# Written Comments No: 0324

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

## ***The best Place for Salmon Farming?***

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

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Other Comments: absolutely No way , No Salmon Farms, no fish feeding facilities that damage any part of the foreshores/ sea beds/ other shellfish or fish/ bird species in our beautiful Marlborough sounds and absolutely NOT in residential zoned areas.



## Written Comments No: 0324

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

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

Email before 5pm, Monday 27 March 2017  
to:  
[aquaculture.submissions@mpi.govt.nz](mailto:aquaculture.submissions@mpi.govt.nz)

Subject	<b>Salmon Relocation Advisory Panel</b>
From	[REDACTED]
To	aquaculture submissions
Sent	Wednesday, 8 March 2017 5:10 p.m.

To the panel.

I 100% support the potential relocation process that NZ King Salmon are seeking.

I have had the opportunity of reading through all the literature and have concluded this a very good move on a number of fronts.

I understand the reasons for the move which is about sustainability with the end product being a high quality food source that has high value around the globe.

One particular aspect of the submission I am keen to support is the science around why the relocation can occur without little or no affect on the environment.

To me it appears there is a big move toward ensuring best practise at every stage of the operation on all the proposed sites. I am sure that with all the lessons learned over the many years and the expertise NZKS have that it will be a transparent operation that will have the confidence of the Sounds community on everything they do.

It is also going to produce healthy fish for a world market that is growing at an ever increasing rate. Who else in the world can boast this?


It will create jobs, provide equipment and techknowlogy opportunities for a wide range of businesses that will further support the Marlborough region around its growth.

The most exciting thing for me is it puts NZ on the global map with a food product/source that cannot be found anywhere else in the world!

Please support this initiative.

Regards

Pete Halligan | DIRECTOR | Top of the South Events  
m. [REDACTED] | e. [REDACTED]



I support the relocation of NZKS salmon farms because I work for NZKS & they are a good employer. I would love to see the company grow & provide more sustainable jobs for the people in this region.

Environmentally speaking, I believe that salmon farming is less damaging to the environment, than say, dairy farming. It would be great to see NZ develop more fish farms in the future. This would give our country an edge ~~as far as~~ over anyone else wanting to do so down the track.



It would be great if farms moved to high flow sites. This would provide better quality fish for us at NZKS to work with & provide an excellent outcome for our customers.

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

Jason Hampton

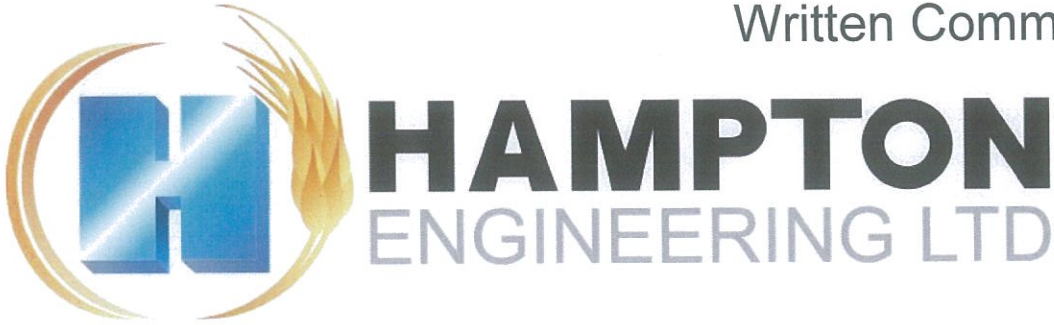
## Written Comments No: 0295

Subject	<b>Salmon Farm Relocation</b>
From	<a href="#">Fred HamptonEng</a>
To	aquaculture submissions
Sent	Wednesday, 22 March 2017 7:57 PM
Attachments	<<Salmon Farm relocation submission.docx>>

Please find attached a submission to: The Salmon Relocation Advisory Panel

--

Regards  
Fred Dodson  
Hampton Engineering Ltd  
[REDACTED] Southbridge 7602  
[REDACTED]



Southbridge 7602

Ph.

Cell.

Fax.

[www.hamptoneng.nz](http://www.hamptoneng.nz)

22 March 2017

To: The Salmon Farm Relocation Advisory Panel

Fred Dodson – Managing Director Hampton Engineering Ltd

I support the Salmon Farm Relocation because I believe the relocation of the salmon farms will produce better environmental, economic and social outcomes.

I understand that by moving from the current low water flow sites to high flow sites the health status of the fish will be improved and therefore the performance. Seabed environmental impact is reduced and is a positive outcome.

Adopting best management practice guidelines that are agreed by council and communities is positive and progressive for the aquiculture industry and its long term sustainability.

More direct and indirect jobs are created if this proposal goes ahead resulting in positive social and economic outcomes.

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

As a partner of King Salmon we view the proposal as a positive with a flow on effect from their positive outcomes. Hampton Engineering is directly affected by the level of maintenance and development work carried out by King Salmon.

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

Your Sincerely Fred Dodson



Subject	<b>Marlborough Salmon Farm Relocation project</b>
From	[REDACTED]
To	aquaculture submissions
Sent	Friday, 10 March 2017 11:29 a.m.
Attachments	<<Support letter (Tomo H).pdf>>

Hello

I would like to submit a letter to support the project.

Please find an attached document.

Kind regards,

Tomo

--

**Tomo Hara**, *Production Activity Controller*



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



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# Written Comment No: 0175

Date: Friday, 10 March 2017

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

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

Dear Advisory Panel

My name is Tomo Hara. I'm working as a Production Activity Controller at the Bullen Street factory in New Zealand King Salmon. I have strong interests in nature conservation and would like to say that I support the relocation project.

I support the potential salmon farm relocation process because, from my understanding of the relocation, the project aims to improve the environment for the company, economy, community, region and the nation, from socio-, economic- and environmental perspectives, which is wonderful. Better production, sales, contribution to local and national economy, less impact on local residents and natural environment. I don't see why not taking this opportunity.

Personally, I will feel happier to work for a company and to live in a country which concerns of improving environment as well as people's lives from social and economical aspects.

I hope the project will go well and smoothly.

Kind regards,



Tomo Hara

Production Activity Controller



## Written Comments No: 0207

Subject	<b>Salmon Farm Relocation</b>
From	[REDACTED]
To	aquaculture submissions
Sent	Tuesday, 14 March 2017 8:20 p.m.

To whom it may concern

I wish to formally record my support for the proposed salmon farm relocation in Marlborough. As a local resident this presents a multitude of positive possibilities for our region and I fully support it proceeding.

Yours sincerely,

Heather Haronga

[REDACTED]  
[REDACTED]

# Written Comments No: 0201

Subject	I support the relocation of the NZ King Salmon farms.
From	[REDACTED]
To	aquaculture submissions
Sent	Monday, 13 March 2017 4:54 p.m.

To whom it may concern

I support the relocation of the NZ King Salmon farms to high flow water sites.

In a world where we want both the environment and its people to thrive there is a need for sustainable resources to support the future of both. From a national perspective of economics, exports, and wellbeing of our people Aquaculture is important. From a community perspective of economics, job availability and wellbeing of our people Aquaculture is important. From a personal perspective, Aquaculture is also important as it allows me to live a healthy and sustainable lifestyle whilst maintaining full involvement in the work force and community. New Zealand King Salmon sells a high quality, premium, product without compromising the environment. New Zealand should be supporting this. Relocation of the NZ King Salmon farms to high flow sites allows for a healthier environment, healthier fish, and healthier communities. It provides for growth of the New Zealand King Salmon Company, yes; however it also opens the doors for growth for Marlborough, New Zealand and the rest of the world. The true beauty of Aquaculture as a sustainable and environmentally sound option is a relatively new idea – let New Zealand be the ones to show this to the world – let New Zealand be the ones to capture this opportunity – and let The World, The Environment, and It's People be the ones who benefit.

With regards,

**Francesca Harris**, *Quality Compliance Advisor*



Tahunanui, Nelson [REDACTED]



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Subject	<b>MPI submission</b>
From	<a href="#">Jill Harris</a>
To	aquaculture submissions
Sent	Monday, 27 March 2017 3:48 p.m.
Attachments	<<SubmissionEmailTemplate.docx>>

Hi,  
Please see attached  
Thanks

--

**Jill Harris**, Sales Analyst



**M:** [REDACTED] | **W:** [www.kingsalmon.co.nz](http://www.kingsalmon.co.nz) | **A:** 6 Mitchelson Street, Ellerslie, Auckland 1051



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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

**Jill Harris / NZ King Salmon Auckland Sales & Marketing / Sales Analyst**

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

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

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

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

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

I **would** like the opportunity to be heard by the Advisory Panel.

## Written Comments No: 0270

Subject	<b>Submission on proposed use of Section 360A of the RMA to allow massive expansion of salmon farming in the Marlborough Sounds</b>
From	[REDACTED]
To	aquaculture submissions
Sent	Monday, 20 March 2017 7:33 p.m.
Attachments	<<MDC MPI application March 2017.odt>>

As attached  
Regards  
Michael  
Michael Harte

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

Name of Submitter in full	Michael David Harte
Address	[REDACTED] Nelson. 7011
Email	[REDACTED]
Telephone (day)	Mobile [REDACTED]
<input checked="" type="checkbox"/>	I am against the whole Ministry for Primary Industries (MPI) proposal for "Potential Relocation of Salmon Farms in the Marlborough Sounds"
<input type="checkbox"/>	I would like to speak to my written submission at a public hearing in
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- The issues include: fewer fish, not as many species, serious loss of biogenic habitats, sedimentation in estuaries and biosecurity incursions.

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

### *The Board of Inquiry drew the limits*

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Inquiry, and then the Supreme Court, made a number of very important findings, which, it is submitted; this proposal is attempting to ride rough shod over.

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

Other Comments: I also have concerns for the Fish farm facility being installed in Okiwi Bay, if MDC give resource consent to it. In those submissions it stated that there would be no issues with pathogens, yet here we have the exact situation. Also that 17 degrees is the maximum temp that allows sustainable salmon farming, yet the proposal will have to use water temperature above that. Likewise it is all wrong, but is being pushed through.

***Conclusion: this proposal is fundamentally flawed, environmentally***

## Written Comments No: 0270

***unsustainable and should not proceed!***

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

Email before 5pm, Monday 27 March 2017  
to:  
[aquaculture.submissions@mpi.govt.nz](mailto:aquaculture.submissions@mpi.govt.nz)

## Written Comments No: 0283

Subject	<b>Email in Support of NZKS</b>
From	<a href="#">Justin Hauser</a>
To	aquaculture submissions
Sent	Wednesday, 22 March 2017 7:59 AM

To Whom It May Concern,

As both a steward of this planet's resources, an environmental advocate, and as a consumer of sustainable seafood and a business owner of sustainable seafood restaurants, I would like to send in a letter of support for New Zealand King Salmon. The organizations that comprise New Zealand King Salmon including Ora King and others are leading the sustainable movement and should be fully supported by our communities. Their success and the viability of their businesses directly impacts our financial businesses in the United States as well as providing massive social benefits for the sustainable consumption of salmon. Please support them in helping relocate their sites to more ideal farming locations in the Marlborough Sound so that we all can reap the positive social, financial, economic and community benefits. Please do not hesitate to call me directly at [REDACTED] so I can provide further evidence of support for them and what they are doing to better our world and our communities in a social, environmental and financial way.

Thank you and have a great day,

Justin Hauser  
CEO  
Life Capital

--

Justin Hauser  
Life Capital  
[REDACTED]

## Written Comments No: 0416

Subject	Salmon Farm Relocation
From	<a href="#">Steve Hawke</a>
To	aquaculture submissions
Sent	Monday, 27 March 2017 11:35 AM
Attachments	<<Submission_SPH.docx>>

Please find attached my submission on Salmon farm relocation

Regards

Steve Hawke, Operations Management Accountant



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



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# Written Comments No: 0416

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

## **Steve Hawke Operations Management Accountant New Zealand King Salmon**

I fully support the rationale behind the potential salmon relocation process proposed by MPI because the salmon farm relocation should provide for better environmental, social and economic outcomes for all stakeholders.

However that being said I do have reservations about the proposed Waitata mid channel site.

I have two concerns about this particular site, the first being the potential navigation hazard a mid channel farm would propose given the fact that the Marlborough district council harbourmaster has also expressed his concerns

The second concern I have with this site is its proximity to Ketu bay.

Historically Ketu Bay in the Pelorus Sound has been a highly popular source of scallops for amateurs and, along with Okiwi Bay, one of the last easily reached and reliable spots and once had an abundant scallop population along with Waitata, Horseshoe or Richmond bays in Pelorus Sound.

Ketu Bay was visited by boats from Havelock, Tennyson Inlet, Portage and French Pass, was a regular destination for cruising boats and was seen as "the jewel in the crown" by amateurs.

Ketu bay was the go-to place for scallops, as it's easily identifiable and sheltered from most wind conditions. Given the current state of the Scallop fishery in the top of the South Island the last thing I would want to see is the scallop bed further compromised by a large salmon farm located at the entrance to the bay. Before I could support this site it would need to be scientifically proven beyond a reasonable doubt that the Waitata mid Channel farm would have no benthic impact on the recovery of Ketu bay's scallop bed.

These reservations aside I support relocating farms from lower water flow sites to higher water flow sites as fish performance will improve and therefore the health of the salmon. It will also overall have a lower level of effect on the seabed which will have many positive environmental benefits for the Marlborough sounds as a whole.

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

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.

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

# Written Comment No: 0559

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 Allan Hawke and I work for NZ King Salmon as a Storeman.

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.

For me personally, I enjoy the work I do for NZ King Salmon and the security that working for a successful Company provides. Members of my family have also worked for NZ King Salmon. My nephew was employed at the age of 17 and worked for the Company for six years. During that time he received valuable on the job training. If the farm relocation goes ahead I feel it will result in economic improvements for the communities in the top of the south. The growth of NZ King Salmon as a business will have flow on effects to local businesses.

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

Signature:



Date:

23/3/17



This submission is on THE POTENTIAL RELOCATION of SALMON FARMS IN the MARLBOROUGH SOUNDS.

My name is Tim Healey and I am a resident of [REDACTED], TORY CHANNEL. My contact number is [REDACTED] and mailing address is [REDACTED] Picton.

I have been a resident living full time in Tory Channel for the last 35 years and wish to comment on the proposed salmon farm at Tio Point Oyster Bay in the Tory Channel.

I have visited Pelorus Sound many times but do not have enough knowledge about the proposed salmon farm relocation sites to make comment except I feel the mid channel site in Waitata Reach near Post Office Point would seriously detract from the beauty of the Pelorus Sound entrance and would be a navigation hazard to all shipping.

Tio Point.

I have fished this area regularly for 35 years with lines and nets. This area has produced good catches of Blue Cod, Terakihi, Blue Moki, snapper, kahawai, Butterfish, red cod, grouper and sharks such as rig, 7 gill and thresher.

Although the proposed site was never a 'good fishing spot' it is very close to my favourites. The Motukina Point and the one to the south before Oyster Bay opens up are particularly good. Inside Oyster Bay it is sometimes just boiling with Herring, Gar fish and Mackerel. I have also commercially taken paua from this area.

The waste coming from a salmon farm is very likely to be carried over these spots as the tidal flow is very swift at times. If the waste will settle is anyones guess and what will



happen to these habitats, if it does, is also unknown. From the reports I have seen I understand the seabed under the proposed site is not high in marine life. That would back up my own experience of catching hardly any fish there. The high tidal flow will carry the farm waste around and into Oyster Bay and it may well eventually settle over areas that have significant value, so the risk of doing damage to really productive habitats is real.

Oyster BAY has a special feeling of remoteness due to being tucked away from the Channel traffic and offers shelter from some north sector winds. Farming and forestry have caused significant damage to the marine environment due to sediment runoff but the oysters the bay was named after are still there in places, struggling to survive. There is plenty of seabird life and marine mammals such as seals, orca and dolphins often visit.

As a resident of the channel I don't see any gain to our community from another salmon farm. The money made and jobs created are all beneficial to Picton and Marlborough but to us locals, all we get is another industrial marine farm and possible loss of a good fishing spot and remote environment.

I oppose the relocation of a salmon farm to this site.

I do not want to speak on my written comments at a public hearing.

Jim Healy.  
22 March 2017.



## Written Comments No: 0252

Subject	Salmon Farm Relocation Submission
From	[REDACTED]
To	aquaculture submissions
Sent	Friday, 17 March 2017 1:12 p.m.

Salmon Farm Relocation  
Ministry for Primary Industries  
Private Bag 14  
Port Nelson  
aquaculture.submissions@mpi.govt.nz

To: The Salmon Relocation Advisory Panel

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 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.

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 hearings panel.

Date: 17/03/17

Name: Chris Hebbard

[REDACTED]  
[REDACTED]

# Written Comment No: 0562

Salmon Farm Relocation

Ministry for Primary Industries

Private Bag 14

Port Nelson

aquaculture.submissions@mpi.govt.nz

To: The Salmon Relocation Advisory Panel

Nathan Hedley, Net Cleaner, New Zealand King Salmon

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

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

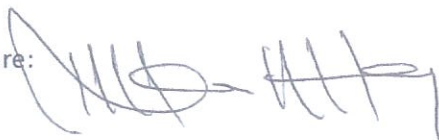
I was raised in Marlborough, but left to work overseas as a commercial diver. When I came back I was contracted to NZ King Salmon as a net cleaner, then offered full time employment with the Company. This was a good job for me as it utilised the experience I had gained overseas and allowed me to remain in Marlborough. During my time with NZ King Salmon I have been given the opportunity to undertake training and upskill.

Along with direct jobs, there will also be indirect jobs created if this proposal goes ahead. As NZ King Salmon grows, so will its need to utilise contractors more, ie, barge companies, engineers and transport companies. This will result in economic improvements for the communities in the top of the south.

NZ King Salmon has a positive presence in the community as it is a major sponsor of a number of local events and also provides sponsorship to local community groups such as schools and clubs.

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

Signature:



Date:

22/3/17

Subject	Salmon Farm Relocation
From	
To	aquaculture submissions
Sent	Tuesday, 21 March 2017 12:51 p.m.

## SUBMISSION TO: MINISTRY for PRIMARY INDUSTRIES

The future of New Zealand will be positively influenced by it's ability to produce high quality food products, including from aquaculture, for the global market. Achieving this in a positive, sustainable way will improve the economic conditions for all New Zealanders, especially future generations and the local Marlborough community.

Making early constructive changes to resource allocation and use is extremely important for sustainable utilisation of natural resources, and to position early and strongly in competitive global markets. Reputations for environmental sustainability are paramount in positively and strongly positioning New Zealand food products in the minds of global consumers ahead of the competition. New Zealand, given its remoteness from most global markets, needs to be an early positioner in the minds of consumers in order to be ahead of the competition. Delays in making such changes, or not making the changes at all, would impair the economic potential of the resource and deny environmental improvements. This would be a loss to the local community and to future generations.

We believe it is important that private sector capital be allocated to NZ's high quality food production in order to deliver regional benefits (environmental, social and economic ) and long term benefits to future New Zealanders. We therefore participated in the NZ King Salmon IPO, and were shareholders in it's predecessor private equity owner (Pohutukawa) .

The proposed better farm locations, with faster flowing water currents, will allow NZ King Salmon to farm in a more environmentally sustainable way, including implementing Best Practice Guidelines developed in conjunction with the community and Marlborough District Council. These guidelines have already been implemented on some of NZ King Salmon's higher water flow sites. The proposed new sites will improve fish health and welfare, and thus deliver higher quality fish such as NZ King Salmon's premium Ora King, Regal and Southern Ocean branded products, to meet growing global demand.

Relocating some existing farms will improve social outcomes through moving to areas with less competing use, including moving away from existing holiday houses and areas targeted as recreational use.

The proposed new farm sites will also allow the opportunity for further growth for NZ King Salmon, as the higher flow water sites are more productive than low flow sites. There are global opportunities for NZ King Salmon's premium branded salmon, and the proposed new farm sites would allow more of these opportunities to be realised.

The enhanced development of high quality aquaculture products is a wonderful complement to the fine wine produced in the Marlborough region, and will enhance the tourism potential of the region for both domestic and international travellers, thus growing and diversifying New Zealand's tourism base.

MRS PILAR HEFFERNAN  
DR MD HEFFERNAN CNZM



Potential relocation of salmon farms in the Marlborough Sounds.

Sang Hei



I have worked at NZKS for nearly 2 years. I support the farms being moved to the new sites because we will be able to grow more fish and have better quality fish. If we have good quality and sell lots of fish we will make more money and have more jobs for others. I will be able to keep my job to feed my family.

Sang Kual Hei

A handwritten signature in blue ink, appearing to be 'Sang Kual Hei'.

16 / 02 / 17



## Written Comments No: 0530

Subject	<b>submission from JS and JP Hellstrom</b>
From	<a href="#">John Hellstrom</a>
To	aquaculture submissions
Sent	Monday, 27 March 2017 4:30 p.m.
Attachments	<<Submission v2.docx>>

To whom it may concern

Please find attached our submission relation to the Marlborough Salmon relocation proposal

Sincerely

John Hellstrom PhD, ONZM  
Judy Hellstrom

## Potential relocation of salmon farms in the Marlborough Sounds

### Submitters:

Dr John Hellstrom ONZM

Judy Hellstrom

Phone: [REDACTED] Mob. [REDACTED] (no mobile signal when at home)  
[REDACTED]  
Picton 7250

[REDACTED]

### Introduction

We, the submitters, are both directors of a small consultancy company, Biosecurity Limited. We live in Queen Charlotte Sound, where we have been residents for 39 years, the last 18 of those as permanent residents.

John received his ONZM for his services to the development of New Zealand's Biosecurity strategy and policies, is currently Chair of the Sounds Restoration Trust, and chairs the Marlborough Committee for the James Cook sesster-centenary. John's PhD is in veterinary epidemiology.

Judy was a member of the Marlborough Salmon Working Group, is a Sounds representative on the Sounds Advisory Group, and the Marlborough Landscape Group, both advisory committees to the Marlborough District Council. She has been appointed to the MDC Aquaculture Working Group. She is also a second-term member of the New Zealand Conservation Authority. Judy has a Bachelor of Applied Science (Landscape Management), and Postgraduate Diploma of Social Sector Evaluation Research (with distinction).

We would like to speak to the Marlborough Salmon Relocation Advisory Panel when the hearings are held.

We are focussing our comments on the following issues in relation to the proposal:

1. Process, including that of the working group that informed the consultation document, where this process has informed the submission process;
2. Landscape and natural character
3. Social impact
4. Navigation

## **A Process**

**A 1 s360A** The proposed process for allowing approval of the six new salmon farm sites, or for some of them, uses a never-before utilised clause of the RMA (s360A). The Government proposes to use this clause to override the Marlborough District Council's (MDC's) plans that will prohibit aquaculture in the high-landscape value areas of the Outer Sounds. We acknowledge that this clause may be able to be used, in certain circumstances. In this instance, we do not believe that it is either ethical or in the interests of the landscape (and seascape) of the Outer Sounds both of which are acknowledged as being of very high value<sup>1</sup>, and which will be seriously compromised by the addition of several hectares of industrial sites. It is also not demonstrably in the interests of the wider Sounds community (refer to our comments on social impact assessment).

The Ministry for Primary Industries (MPI) continues to advocate for this process, as it did throughout the Marlborough Salmon Working Group (MSWG) process, and as it has appeared to have done in the series of consultation meetings held in February and March<sup>2</sup>. We recognise that MPI staff are public servants and should act at the behest of their Minister. However, there have been mixed messages in this: purporting to consult with the community whilst actively advocating for the proposed new sites has not been an open process. As an example of non-disclosure, the MPI staff did not acknowledge until well into the MSWG process that s360A would be used.

S360A bypasses the normal Environment Court process, under the RMA. Thus, a Ministerial decision may give priority to the commercial interests of NZ King Salmon (NZKS), against the interests of the wider community, and against previous findings of the BOI and Supreme Court with respect to landscape values (refer to our comments under landscape values). This proposal will enable a privately-owned (with largely foreign ownership) company to use public water space for free, above the interests of other users of the Marlborough Sounds, including iwi.

## **A 2 Conflicts of interest**

At the outset of the MSWG process, a letter was sent by the community representatives on that group to the MDC and MPI, querying the suitability of Mr Ron Crosby as facilitator for the group, because of his previous advocacy acting for NZKS. In the event, Mr Crosby assured the MSWG that he would be properly objective, as he was often required to be when working as an Environment Court Commissioner. This assurance was accepted.

However, at a later meeting of the MSWG, Mr Crosby gave his legal opinion, having read the Supreme Court decision about the threshold for salmon farms in

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<sup>1</sup> Davidson, R., Duffy, C., Gaze, P. Baxter, A., DuFresne, S. Courtney, S. and Hamill, P. 2011. Ecologically Significant Marine Sites in Marlborough, New Zealand. Coordinated by Davidson Environmental Limited for Marlborough District Council and Department of Conservation.

<sup>2</sup> "The Sun", 10/03/17. P.15, recording the Public meeting at Waitaria.



the Waitata Reach, that the Court had not prescribed what that threshold should be. In doing so, he cited his considerable experience as an Environment Court Commissioner. Now, it is hard for us to understand how Mr Crosby's views about the number of farms that could possibly be in Waitata Reach could be objective. We consider that he should have declared a conflict of interest at the outset because of his earlier declared view, and offered his resignation from this important role, which must be seen as being independent and unbiased.

We note that Cabinet Paper Sub 16-0078 (obtained through OIA) raises the importance of the independence of the advisory panel: *An independent panel will provide greater public confidence in the process and is in line with the Working Group's recommendations on the need for independent testing of the information* (p.20/24). We submit that the conflict of interest noted above has caused loss of confidence in the process. This event is now widely known about in the Sounds community.

A further conflict of interest became evident during the MSWG meetings. Although there were ostensibly two iwi representative on the group, the Te Atiawa representative did not declare, until well into the process, that NZKS and Te Atiawa were planning a partnership with respect to one potential farm in Tory Channel (Tio Point). That person's role was then clearly seen as one of advocating for that site – his views could not be seen as anything other than biased towards the proposal.

This further exacerbated the apparent poor process of determining representation on the MSWG by iwi – for example, not until very late in the process was a representative of Ngati Kuia brought into the MSWG. We do not consider that the requirements of s360B (3) (b) have demonstrably been met. The other initial iwi representative did not take up the representative role, as he did not attend any but the first meeting. We question whether these arrangements meet the Crown's obligations under the statutory agreements reached with the affected iwi under the Settlements of Te Tau Ihu o Te Waka a Maui.

Finally, a number of technical reports have been prepared by the same individuals and/or companies that presented evidence through the Board of Inquiry process on behalf of NZKS. Given that they have been contracted this time by MPI, but clearly nominated and/or selected by NZKS, there are apparent conflicts of interest for the report writers and for the independence of the findings and conclusions of such reports. One in particular has an overt conflict of interest: the Social Impact Assessment (see further comment below).

**A 3 Consideration of alternative options during the MSWG process,**  
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].

The aims of the MSWG were:



- to consider options **for existing salmon farms** in Marlborough to adopt the guidelines; and
- to ensure the enduring sustainability of salmon farming in Marlborough, including **better environmental outcomes including landscape, amenity, social and cultural values.**

There was no serious consideration by the MSWG of any of the listed possible alternatives (reduce production, relocate to land sites, relocate to higher flow sites, capture wastes in-water, remove organic waste from sea-bed, improve feed efficiency), except relocation to higher flow sites. In addition, the possibility of research into open-sea cages was dismissed by the NZKS representative on the MSWG as “ten years way”, when they exist now in Norway, and further research into this technology is being undertaken world-wide. The MSWG process seems to have been manipulated to ensure that only re-location to high flow sites was deemed by MPI to be an option. This is consistent with the late admission by MPI that s360 of the Resource Management Act (RMA) would be used to override the MDC Sounds Resource Management Plan.

The first aim of the working group was not adhered to. The second aim was also not adhered to. For example, there is still no understanding of how cultural values will add to the “enduring sustainability” of salmon farming. The initial advice received, ahead of a cultural impact report (CIA) being produced (and no CIA report was received by the MSWG), indicated that that report could be negative, at least for Pelorus Sound. Further, the social impact report received did not provide information to support “better environmental outcomes” (see later section in this submission).

We recommend that rather than considering only the relocation proposal for salmon farms into areas prohibited to aquaculture (CMZ1), MPI and the industry should invest in research to expedite offshore farming as a future-proofed alternative (see also our comments on landscape).

## **B Landscape and Natural Character**

### **B 1 The expert advice received**

John Hudson’s methodology is based on a professional evaluation with reference to the landscape assessment criteria used by the New Zealand Institute of Landscape Architects (NZILA). It is noted that these criteria do not address natural character. Whilst he has referred to the previous work done (eg <sup>3</sup>) in assessing the landscape and natural character values of the outer Sounds, for example Waitata Reach, he has paid scant attention to the landscape values held by communities, including local residents, iwi, and the wider Sounds communities. Any assessment of landscape must take into account historical,

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<sup>3</sup> 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,

community, aesthetic, amenity values, and values must be acknowledged as belonging to those who hold them<sup>4</sup>.

In his verbal presentation to the MSWG, Mr Hudson claimed to be following the guidelines for landscape assessment set down by the Quality Planning Organisation<sup>5</sup>. When those landscape assessment criteria (also followed by the NZILA) are viewed, it becomes clear that Mr Hudson was undertaking a “proposal-driven” landscape assessment of each of the potential new salmon farm sites. He has demonstrably not followed the best-practice consideration given for proper landscape assessment, in that he paid scant attention to historical, aesthetic, community or amenity values.

*Community engagement and consultation should be carried out in order to determine how the community perceives and values the landscapes and natural features and why. Community engagement prior to or as an integral early phase of a professional assessment can provide useful baseline information, aid issue identification and educate the community. Consultation on the findings of an assessment can also help to validate the professional assessment. (QP Org: Landscape Assessment: Best Practice considerations)*<sup>6</sup>

Mr Hudson also appears to have largely dismissed the findings of the BOI with respect to landscape. In particular we consider that Mr Hudson has not sufficiently considered the **seascape** as an intrinsic part of the Sounds landscape (ref para 606 of the BOI):

*“.....the role of the sea, or at least the surface of the marine environment .....is unambiguously an integral part of all Marlborough Sounds landscapes at any scale of analysis.”*

Neither John Hudson (as the nominated landscape expert) nor any other person in the papers provided has mentioned the mirage phenomenon of the “floating island effect” that occurs frequently in the Sounds in light south-easterly conditions. (Ref. floating island mirages [https://en.wikipedia.org/wiki/Fata\\_Morgana](https://en.wikipedia.org/wiki/Fata_Morgana)). This was accepted by the BOI with respect to the effects of salmon farms on long sea-views in Queen Charlotte Sound. This causes the edge of islands, points, and built structures to appear to sit higher above the water line. This mirage also raises the image of the object above the horizon. This effect would make all of the salmon farms in the Waitata Reach easily visible, from any direction over the width and length of the Reach. The floating island mirage effect doubles the visual impact of the object. For example, under these conditions, the Ruakaka Bay salmon farm can be easily seen from sea-level at the Waikawa Marina (a distance of approximately 12km from the farm).

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<sup>4</sup> Para 596 of the BOI describes landscape thus:

“Landscape does not require precise definition. It is an aspect of the environment and includes natural and physical features **and social and cultural attributes.**”

<sup>5</sup> <http://www.qualityplanning.org.nz/index.php/planning-tools/land/landscape/landscape-assessment> ).

<sup>6</sup> <http://www.qualityplanning.org.nz/index.php/planning-tools/land/landscape/landscape-assessment> ).



## **B 2 Landscape values of Waitata Reach**

The seascape was also seen by the BOI as an intrinsic aspect of landscape for this consideration (ref para 606, BOI). The BOI found that “the Reach as a whole has high natural character value which extends close to outstanding in some places, particularly on the western headlands” (para 655). The comment was made that the terrestrial landscape would continue to increase in value as re-vegetation and restoration continued. (Since 2011, there has been substantial restoration of the terrestrial landscape through wilding pine control.) The proposed MEP defines all of the outer Waitata Reach, including the seascape, as an ONL. The BOI found the Waitata Reach as a whole to be a landscape of very high visual amenity (para 665).

The BOI’s 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]

In summary (para 676), the BOI found, for the (then) proposed Kaitira site, that (this) site *“is in a particularly sensitive part of the Waitata Reach – the gateway to Pelorus Sound. It sits on an important navigation route .... The site area has high natural character, and we agree with Mr Rough’s assessment that the proposed farm will have a high impact on natural character. We do not accept Mr Boffa’s contention that the deletion of the barge is an effective means of mitigation. We accept that it is the simple presence of the farm at this location that is the principal effect on natural character. The proposal would result in a built form in a key prominent location at the entrance to Pelorus Sound.”*

We consider that this same conclusion would also apply to the proposed mid-channel site in Waitata Reach. It would result in a built form highly visible both from the seaward entrance to Pelorus Sound looking towards the outstanding landscape feature of Maud Island, and from Maud Island out through the seaward entrance of the sound (this seaward end of the Reach is also an ONL). Para 697 of the BOI states, with respect to the Waitata Reach: “salmon farms are a highly visible form of marine farm. As a consequence, the mere presence of salmon farms in the Waitata Reach, and their cumulative effects constitutes a substantive issue in respect of the effects of the proposal on the natural character of that Reach.” The BOI said that, individually, each new farm would have a negative effect on natural character. There was thus both an individual effect and a cumulative natural character effect of salmon farms in this area.

Given that maintenance/ harvesting barges would be at the mid-channel site frequently, and for hours at a time, the visibility of the farm would be high, from every direction. Further, Mr Hudson stated that he had found that it would be “lit up like a Christmas tree” at night. This may be helpful for navigation – but is unacceptably bad for its effect on the natural character, which is also outstanding at night. Given the omission at this stage of the aquaculture chapter from the MEP, the policy with respect to lights on boatsheds would still be relevant:



13.10.22 (f) because “locating lights on boatsheds can have an impact on visual amenity and landscape values”.

We consider that this proposal will degrade the Outstanding Natural Landscapes and High Natural Character values of the Waitata Reach.

### **B 3 Blowhole Point sites**

The previous comments relate to the mid-channel site in Waitata Reach in particular. However, most of the same comments also apply to the two proposed Blowhole Point farm sites. These sites are within the proposed Outer Sounds Outstanding Natural Landscape and within a proposed Outstanding Natural Feature (with Port Ligar, Forsyth Island and Kaitira Headland), and part of the Pelorus Sound ‘gateway’. We do not accept Mr Hudson’s view that farms at these sites would not compromise the outstanding natural landscape. He gave as part-rationale for this view the existence of old pasture and wilding pines on Blowhole Point itself. (This had echoes, for us, of the original BOI where Mr Boffa claimed the same about Kaitepeha at the Queen Charlotte Sound entrance to Tory Channel, without referring to the long sea-views from the same place. In that instance, the pines were gone and the point well toward landscape restoration by the time of the hearings). In the case of Blowhole Point, the wilding pines will shortly be controlled, and the whole area is being restored. These Blowhole Point farm sites are located in the ‘gateway’ and will be lit at night. Cumulative effects need to be considered both for the ‘gateway’ entrance and for the relatively pristine Waitata Reach as a whole.

We thus do not support the establishment of new salmon farms at Blow Hole Point (North or South).

### **B 4 Horseshoe Bay and Richmond South sites**

We consider that the cumulative effects need to be carefully considered for the relatively pristine Waitata Reach as a whole, and for these two site in close proximity to eachother. The Horseshoe Bay site is also in the vicinity of an outstanding natural (benthic) feature, the biodiversity of which is likely to be compromised by the proximity of a salmon farm. Our previous comments about landscape in Waitata Reach as a whole also apply to both of these sites. Richmond South is partly in the foraging area for the King Shags <sup>7</sup>.

### **B 5 Tio Point site**

The potential site at Tio Point is in the high natural character area of the outer Tory channel. The MDC *et al* publication previously referred to<sup>8</sup> defines Tory Channel coastal natural character as “high” at Scale 4:

*Those areas that exhibit a combination of natural elements, patterns and processes that are exceptional in their extent and relative intactness, integrity and lack of*

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<sup>7</sup> We have not submitted on the issue of King Shags, whilst noting it is a matter of great importance, given the vulnerability of this species. We support Rob Schuckard in his submission on this matter.

<sup>8</sup> 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,



*built structures (the 'clutter' factor) and other modifications compared to other areas in the Marlborough Region (p.262).*

Given the other approved salmon farms in Tory Channel, including the recent enlargement of the Clay Point farm (also in a partnership arrangement between NZKS and Te Atiawa), we do not recommend that yet another farm is approved for this high natural character area, one that will be highly visible to the hundreds of thousands of ferry passengers traversing this route every year. It will add to the 'clutter' and high visibility of several salmon farms along this main gateway to the South Island. It has also been identified as being very close to the ferry route (Navigatus Report), and thus also potentially a navigation hazard, should there be an navigation incident with a ship.

The marine landscape for this farm site is also sensitive. The proposed farm extends over reef and rocky habitat at both ends, and also inshore of the proposed site. There are also rocky outcrops with tubeworms in the deeper water just outside the site. The reviewer of the Cawthron report (MacLeod 2016) has picked up three points that have the potential for environmental concern: firstly, that there are reefs and biogenic structures located relatively close to the proposed farming site, the hydroid communities which are known from this area and are of local significance but sparse in this particular location and thirdly, the fact that the large depression (hole) near the site may provide an area for organic matter accumulation. We have not commented further on benthic sedimentation and enrichment matters – we concur with Rob Schuckard's submission on these issues, noting the additional benthic sedimentation risk for this site.

## **C 1 Social Impact Assessment (SIA)**

*Social impact assessment includes the processes of analysing, monitoring and managing the intended and unintended social consequences, both positive and negative, of planned interventions (policies, programs, plans, projects) and any social change processes invoked by those interventions. Its primary purpose is to bring about a more sustainable and equitable biophysical and human environment (IAIA 2003)<sup>9</sup>. This definition is very close to the RMA definition of purpose: S5 (1) and (2).*

This further statement from the IAIA guidelines is pertinent: *Most importantly, SIA focuses on the individuals, groups, communities and sectors of society that are affected by change.*

This is the first major failing of the Taylor Baines SIA report for the NZKS proposed new sites. The report bases its findings only on interviews with neighbours of salmon farms. These are the only stakeholders who have been interviewed – and most of them were interviewed in 2011 and 2012, with a few more interviews (again with neighbours of salmon farms, ie those who overlook them) in 2016. This is a very small set of stakeholders compared with the wider

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<sup>9</sup> International Association for Impact Assessment, Fargo, USA

groups of affected stakeholders (eg boating communities of Picton and Havelock, tourist operators, fishers, community groups in the Sounds, tourists (eg ferry passengers arriving in Picton), other Sounds residents (both permanent and holiday house owners).

SIA can be a policy-level assessment, or as in the NZKS case, a project-level assessment. Project level assessment is often confined to determining how a project's negative effects could best be minimised and its positive effects enhanced. Such analysis may be implemented in anticipation of a proposed development or policy change, or retrospectively to assess effects that have actually occurred as a result of the change. In this case the analysis is in anticipation of a proposed change. The author (James Taylor) has created an assumed set of movements of existing salmon farms (excluding Motukina and Te Weka) to new sites, demonstrating, by the choice of a single parameter (number of residences overlooking farms) that an improvement in "social effects" would be made. There are significant limitations with this approach to assessment of social effects (see above).

The second major failing of the Taylor Baines report is that the only effects considered (with respect to the very small group of affected stakeholders) were sight, sound, noise, shoreline solid waste effects, and wildlife nuisance effects. The latter two are slight misfits here – it is assumed that their impacts would be negative if the neighbours could see them and didn't like them – however, the report does not elaborate on how the information contributed to the SIA.

In any case, this has made it a relatively simple exercise for Mr Taylor to quantify the results, of what should at least have initially been more of a qualitative assessment. There are ways of translating qualitative assessment/evaluation to quantitative results – but the author has taken the shorter method of going straight to only easily quantifiable results.

Mr Taylor touches on three wider social impacts: employment opportunities, perceived positive impact for Te Atiawa, and NZKS community involvement (implying that more sponsorship to community initiatives would follow if the new sites were approved). It is noted here that kaitiakitanga appears to refer to the assumption that there would be better environmental outcomes in Tory channel with (more) fast flow farms. That is not proven, if the technical reports are carefully considered. It may be that further cumulative effects will occur, particularly to water column and more distant organic and non-organic sedimentation, and to damage to the benthos. This appears to be the antithesis of kaitiakitanga.

Even using the 3 parameters of odour, noise and visual, the quantitative assessment method used by the author shows that Forsyth is preferable to Richmond South, Horseshoe and Waitata Reach.

It was noted in the BOI report that Mr Taylor of Taylor Baines (for NZKS) and Dr Phillips (for MDC) had used markedly different criteria for their respective SIAs



for the application for 9 new farms. Because of this, the BOI chose to go with its own conclusions:

*[964] In our view the divergent evidence of the experts simply reflected their respective briefs, and we did not get an objective overview of the potential social effects. Our decision on these applications is informed by the large amount of evidence we received from the other experts, residents and users of the Sounds. In this regard we heard extensive evidence on important physical effects and consequences for ecosystem function, navigational safety, tourism and recreational amenity issues (amongst others) which all make a contribution to social wellbeing. Our findings on the economic benefits are also relevant as a contribution to social wellbeing.*

Because of the limited approach of the Taylor-Baines report to SIA, we have no confidence in the conclusions that those new sites out of sight of their neighbours have greater social acceptability, and therefore I conclude that this social impact assessment has not fulfilled the requirement of the RMA (Part 2, Section 5) as below:

The purpose of this Act is to promote the sustainable management of natural and physical resources.

(2) In this Act, **sustainable management** means managing the use, development, and protection of natural and physical resources in a way, or at a rate, **which enables people and communities to provide for their social, economic, and cultural well-being** and for their health and safety while—

- (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and
- (b) safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and
- (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment.

There is another more serious failing of the Taylor Baines report, affecting its credibility, and also involving MPI. The reviewer who was contracted by MPI to give an independent critique of the Taylor Baines report was Rob Quigley, with whom James Taylor was already collaborating on a publication that had been commissioned by MPI<sup>10</sup>. This is a conflict of interest and also a process issue, as noted above. The author (Taylor) had previously advocated for NZKS' original application before the BOI, so appears to be conflicted. His minimal coverage of the social impact of the proposed new sites reinforces our view on this.

We have read the above-mentioned 2016 publication by Taylor and Quigley, and find that it has a better coverage of social impact than the 'expert' report prepared by Taylor for MPI. It was not one of the papers made available to the MSWG. However, it also has some failings in its conclusions. For example, it seems to assume that NZKS already has "social licence" for its activities, in its discussion about ways of maintaining this. We have added a few comments here about social licence, as it is an issue upon which John Hellstrom has been invited to speak on a number of occasions to industry groups (eg Dairy Industry, Poultry

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<sup>10</sup> James, J., Quigley, R. Aug 2016. The Social and Community Effects of Salmon Farming and Rearing: A Case Study of the Top of the South Island. (Prepared for aquaculture Unit, MPI)



Industry).

## **C 2 Social Licence**

Social licence to operate is the acceptance or approval from communities and stakeholders of the legitimacy of what an enterprise or industry does or wants to do (the concept came from the Canadian mining and logging industries).

Empathy is crucial to gaining social licence. This is crucial to trust, along with commitment, transparency and competence. To date NZKS has not demonstrated any of this to the community.

Social licence is informal, given not bought or taken, based largely on values rather than science, driven by trust so is hard to get and easy to lose; can be eroded by evasion and lack of transparency. It is also subject to influence by others: the process that the MSWG was engaged in, and the hearings of the Independent Panel could well be harming the social licence of NZKS, rather than helping it. If this process (the consultation process and hearings) is not seen by the community to be fair and reasonable, social licence will not be either gained or held.

Politicians, regulators, competitors and activists can all harm social licence. For example, regulators can regulate to protect an industry, but they will generate loss of social licence in doing so. Politicians cannot go out and get it; industry groups cannot assume it. For example, given that three out of the six new sites identified by the Minister and MPI are in locations that the MDC and community have said should be off-limits for marine farms because they're in uniquely beautiful spots, important habitats and recreational areas, it is highly unlikely that social licence for these new salmon farms would be gained. For this to happen, salmon farming must have the support and buy-in of the people of Marlborough. The regulatory mechanism proposed to make this happen (s360 of the RMA) is most unlikely to gain social licence for NZKS.

In this respect, NZKS is absolutely ignoring the rulebook on social licence, and MPI has set out to work with this industry to assist them to gain it. We question whether it is the legitimate business of a government department to assist a private commercial company (mostly overseas-owned) to do its business. (To date, MPI has spent \$500,000 in support of this application by NZKS – information received through OIA request)

## **D Navigation**

The technical report, prepared by Navigatus Consulting (Auckland) appears immediately to be flawed, because there was no consultation during its preparation with the Picton/Sounds Harbour Master. Although the potential risks are clearly set out in the executive summary, they are treated as theoretical. For example, "there is a conceivable possibility of a farm breaking free" would be more credible if the fact that a farm has been known to break free was recorded.

It is now known that the Marlborough Harbourmaster considers that the mid-Waitata Reach site may not be viable, because there is a significant navigation



hazard associated with this site. Navigatus states that there is a potential navigation risk with Tio Point, as it is closer to the nominal ferry paths than the existing farms. The Harbour Master may have a more risk-averse view, but this information has not been provided. Navigatus also sees a potential navigation hazard with Blowhole North, as it is located on a natural navigation route. We understand that the Harbour Master was to be asked to comment about the navigational safety of all of the proposed new farm sites – however, if he has done so, this information has not been made available..

The consultant also notes that “the farms should be correctly lit and will be crewed by well-equipped competent mariners with some knowledge of first aid and access to communications equipment”, thereby apparently in ignorance of the fact that it is not planned for at least one farm in the Waitata Reach to have a resident crew on it. The suggestion that the mid-Waitata Reach farm should not be painted dark green, but a bright colour to make it more visible to shipping is not likely to be well received by those who will consider that it will already detract from the natural character or landscape values of the Reach.

Navigatus also underplays the effect of funnelled winds in parts of the Sounds (particularly Tory Channel), although noting that there can be severe gusts. There can be whole days when the wind speed is gusting at well over 100km/hr, thereby causing potential navigation risks with ferries passing each other in the channel and with salmon farms in the channel as well. The activity of cruise ships in Pelorus Sound is also understated, given the Harbour Master’s recent statement that cruise ship visits into the Sound are expected to increase.

Given the uncertainties implicit in this report, we have concerns about navigation risk, concern about lighting of farms, concern about charting (given likely delays before cruising guides and charts will be updated), and concern that it is assumed that all farms will be staffed at all times. These concerns reinforce our view that none of the proposed farms in Waitata Reach, or the proposed Tio Point farm, should be approved.

### **E Conclusion**

We have commented in depth on the process involved in consideration of six potential new salmon farm sites, including the MSWG; consultation and the “expert” reports; conflicts of interest; and the intended use of s360 of the RMA to override the MDC Sounds Resource Management Plan and future Marlborough Environment Plan.

We have commented in particular on three further aspects: landscape values, social impact assessment and navigation concerns. We have not commented on other crucial aspects of this proposal, including water column and benthic effects, cumulative effects of feed levels, King Shags foraging areas. We support the submission on these matters by Rob Schuckard, for the Friends of Nelson Haven and Tasman Bay Inc., and Kenepuru & Central Sounds Residents’ Association Inc. We share the serious concerns expressed in that submission.

We have no confidence in the ability of NZKS to meet best management (Benthic) guidelines even if the farms move to higher flow areas: this company has not yet demonstrated that it is meeting them in the newly-approved farms, because monitoring reports have not been made available.

Our strong recommendation to the Advisory Panel and to the Minister is that none of the proposed new sites should be approved under s360A, and that NZKS should work to meet the agreed best practice (benthic) guidelines with the existing farm sites, by lowering its production to more sustainable levels. We submit that this may be its best opportunity to secure support for its activities (and hence “social licence”).

We submit that there should be no more salmon farms in the Marlborough Sounds until NZ King Salmon shows it can operate the ones it has within the agreed benthic guidelines.

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

## Written Comment No:0581

Subject	<b>Fwd: Baz H and Sarah B Submission</b>
From	<a href="#">Sue Stevens</a>
To	aquaculture submissions
Sent	Monday, 27 March 2017 2:38 p.m.
Attachments	<<Sbizhub pic17032713370.pdf>> <<Sbizhub pic17032713380.pdf>>



# Written Comment No:0581

Salmon Farm Relocation

Ministry for Primary Industries

Private Bag 14

Port Nelson

aquaculture.submissions@mpi.govt.nz

To: The Salmon Relocation Advisory Panel

Bar Henare.

Seawater Operations  
Manager.  
NZKSI.

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

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

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

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

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

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

  
B. Henare.

Relocation of Salmon Farms in the Marlborough Sounds

Vanny Heng

I have been working at king salmon nearly four years and I like my job. I have 3 children and a mortgage that I help to pay for. I support the moving of the farms in the sounds because we will have more jobs because of better quality fish, more sales and I will be able to continue working here. The new farm site will be better for our environment.

Vanny Heng