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

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## Written Comments No: 0211

Subject	<b>NZKS farm relocation</b>
From	[REDACTED]
To	aquaculture submissions
Sent	Wednesday, 15 March 2017 12:31 p.m.

I just want to comment positively about New Zealand King Salmon and aquaculture in Marlborough in general. I am a resident of the Tasman region and believe strongly that aquaculture is far and away the most sustainable and efficient way that we have of growing high quality animal protein. I am aware that there are environmental impacts from sea sites; however, I think that they pale in comparison to the effects of land-based agriculture. I suspect that you may have received numerous negative emails regarding this issue, so I just wanted to balance out those opinions with my own. Keep in mind that generally people who have no issue with something will not be very vocal, though they are likely the strong majority. The vocal minority makes the most waves, but I think it's important to remember that they are the minority.

Zac



**WAIKAWA BOATING CLUB**

Waikawa Marina

Picton 7250

27 March 2017

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

To: The Salmon Relocation Advisory Panel

As a Boating Club with over 650 members we actively encourage the protection and enhancement of our environment for our enjoyment and for our future generations to enjoy. It is important to us that all marine farming is operated professionally, be environmentally sustainable and economically viable with having minimal visual interference.

We have partnered with NZ King Salmon for several years as one of our key sponsors because we believe they consistently work hard to achieve in these areas.

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

We 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 with 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.

When NZ King Salmon is successful our whole community benefits and we hope to continue to build our partnership for many years to come.

We would also like to be heard by the hearings panel.

A handwritten signature in blue ink that reads "Sue van Velzen".

Sue van Velzen  
Club Manager  
Waikawa Boating Club

## Written Comments No: 0322

Subject	Submission attached
From	[REDACTED]
To	aquaculture submissions
Cc	[REDACTED]
Sent	Monday, 27 March 2017 2:26 PM
Attachments	<<WBC King Salmon Submission.pdf>>

Hi There,

Please find out submission in support of the Salmon Farm Relocation proposal.

Kind regards

Sue van Velzen  
Club Manager  
Waikawa Boating Club



/waikawaboatingclub.co.nz



**WAIKAWA BOATING CLUB**





The Way the World Learns to Dive



- \* Dive gear - buy or hire
- \* Dive trips
- \* PADI Dive training
- \* Tank fills & testing
- \* Nitrox by arrangement

Salmon Farm Relocation

Ministry for Primary Industries

Private Bag 14

Port Nelson

Written Comment No: 0434

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

To: The Salmon Relocation Advisory Panel

I am the owner operator of Waikawa Dive Centre located at the Waikawa Marina, Picton. We have operated here for the last 4 years. Our Business services the needs of divers in supplying and servicing dive equipment, cylinder testing and filling and diver training. We also have "Clean Up" or "Rubbish" dives from time to time, and NZ King Salmon support us in these community events.

NZ King Salmon play a major factor in this businesses success as regular contact with the shop is made. Support from them by way dive equipment and servicing is the only way the business can afford a permanent staff member in the winter months. Diving is very seasonal and the public custom drops to levels where financially the shop would not be viable, full stop.

It would be a real shame not to have a dive shop in this area as for the summer month's divers flock to this area on holiday and to dive. Indirectly by way of King Salmon using our services they allow the dive shop continue.

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 flow sites fish performance will improve and therefore the health of the salmon. It will also have a lower level 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.

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 Island.

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.

Name: Stuart Scaife

March 2017

Date: 24<sup>th</sup>



## Written Comment No: 0434

Subject	King Salmon relocation submission.
From	<a href="#">Waikawa Dive Centre</a>
To	aquaculture submissions
Sent	Saturday, 25 March 2017 5:07 p.m.
Attachments	<<king salmon sub.docx>>

[www.waikawadivecentre.co.nz](http://www.waikawadivecentre.co.nz) \*  
[www.facebook.com/WaikawaDiveCentre](https://www.facebook.com/WaikawaDiveCentre)



- \* Dive Gear Buy or Hire
- \* Dive Trips-Scuba/Snorkel
- \* PADI Diver training
- \* Cylinder fills & testing
- \* Equipment Servicing

Pict on 7250

**From:** Ella Sims [REDACTED]  
**Sent:** Wednesday, 12 April 2017 10:41 a.m.  
**To:** aquaculture submissions <[aquaculture.submissions@mpi.govt.nz](mailto:aquaculture.submissions@mpi.govt.nz)>  
**Subject:** Oliver Brennan submission

Thank you very much.

Attached is my submission

Please get back to me with any concerns

Many thanks,  
Oliver

## Waitata Lodge Opposing the Relocation of all Proposed Six Salmon Farms

I would like to speak to the Marlborough Salmon Farm Relocation Advisory Panel at hearings to be held in April.

This submission entails my view on the proposal to amend the Marlborough Sounds resource management plan to enable relocation of up to six salmon farms.

On behalf of the permanent and part time resident's of Camp bay Waitata bay Lodge I would like to oppose the relocation of all six salmon farms that New Zealand king salmon is applying for.

Of the six, I strongly disagree with the three following salmon farms, Waitata mid reach, horse shoe bay and Richmond bay.

I would kindly like to decline New Zealand king salmon's offer due to:

- Pollution the salmon farms will produce and the effects on the surrounding marine life and ecology
  
- Community effects due to the damage salmon farms cause to food sources tourism, and existing income

## Pollution the farms will produce and the effects on the surrounding marine life

I feel NZ king salmon are applying for the high flow farms to hide the damage and pollution that the farms will do to the surrounding marine life and ecology. By having high flow farms NZ king is able to contain more fish whilst occupying the same amount of surface area.

It is to my understanding that a salmon farm in a low flow area has to be moved after x amount of years because of damage caused to the sea floor beneath it due to the dense population of fish.

High flow farms have larger amounts of fish, larger feed amounts and overall more toxic waste produced. NZ king salmon claims the high flow farms have a benthic that meets requirements but the truth is high flow farms have an overall larger benthic footprint.

The effects however might not be seen as directly as a low flow farms, the increased rate of flow in a high flow farm washes the toxic waste produced by the farms away and to an unknown location.

In my opinion a salmon farms can only have a negative effect on its surrounding environment, the more fish the larger the farm is and the worse the environment is effected. By adding the additional salmon farms to the areas the complete ecology and marine food chain will be changed.

## The questions I would like to ask

1. Were will the wastes from the salmon farms wash to?
2. What effects will the added waste have to the marine life and ecology?

Oliver Brennan (Permanent Resident of camp bay, Waitata)

3. If a low farm damages its direct surroundings it can be noticed and moved but if a high flow farm damages its nearby surroundings with a more or less blanket effect when and at what point will it be recognised that a high flow farm should be moved?



Oliver Brennan (Permanent Resident of camp bay, Waitata)

## Community effects due to the damage salmon farms cause

The community of the Outer Pelours sounds is a community that relies on the sea to provide food and income. With the addition of any salmon farms fishing spots, seafood, income and tourism are all negatively affected upsetting the residents of the community.

### Food

Introducing the salmon farms could affect and reduce several food sources for the local community and almost certainly will return no food.

Fish and other sea food is a staple food of the local community and it would upset a lot of locals to see the food that the sea provides decline

### Tourism

The area has a increasing number of tourists which come to the area for its amazing scenery, marine life and sea food, If any of these are effected tourism will see a strong decline.

As a resident of Waitata lodge I have seen this first hand with the Blue cod limit dropping over the years to the current limit two fish per person, also a current ban on scallops has seen recreational fishers stop coming to the area.

Apart from the marine life damage the farms could cause, the "look" of the farms is not appealing to most. This is a point not to be missed with several farms near by, the tranquillity and the natural beauty of the area will drastically change for the worse.

### Income

NZ king salmon claims it will bring jobs and income to the area but of the several existing farms in the area the majority of the workers do not come from the direct surroundings. The community will not receive the additional revenue NZ king salmon will receive however it will reduce tourism and the seas productivity reducing the community's income.

Oliver Brennan (Permanent Resident of camp bay, Waitata)

I feel allowing the relocation of salmon farms will bring minimal income to the area. The salmon farms will negatively affect the community by effecting the community's existing income, food sources and scenery.

### Questions I would like to ask

1. What would NZ king salmon do to compensate the community's losses?
2. Apart from the increased income NZ king salmon is claiming it will bring to the area are there any other positives that the salmon farms could bring to the community?

Overall, The additional salmon farms to the area will negatively affect

- The marine life
- Food sources
- Tourism
- Scenery
- And will have no significant income/benefits to the area or residents

Oliver Brennan (Permanent Resident of camp bay, Waitata)

In conclusion,

I Oliver Brennan on behalf of Waitata Bay lodge, permanent and part time residents of the Marlborough sounds community would like to oppose the relocation of all six salmon farms and I would strongly like to oppose Waitata mid reach, horseshoe bay and Richmond bay proposed Farm sites due to the negative effects it will have on the marine life, food sources, tourism, scenery and non-beneficial to the community.

I would appreciate it if a public vote was had on which farms, if any, to be relocated including the option to reduce the total amount of NZ king salmon farms in the wider area.

If any of the farms are selected for relocation further and more detailed tests are done to see if the site is suitable and then the findings be made public.

The community to be compensated for their losses caused by any NZ king salmon farms and jobs that the salmon farms create and are to offered within the community first.

It is publicly made clear at what point NZ king salmon will stop applying for additional salmon farms and how much pollution they are currently creating.

If you wish to contact,

- Mobile [REDACTED]
- Home [REDACTED]
- Email [REDACTED]

I look forward to your reply

Yours sincerely,  
Oliver Brennan.

# Written Comment No:0563

Salmon Farm Relocation

Ministry for Primary Industries

Private Bag 14

Port Nelson

aquaculture.submissions@mpi.govt.nz

To: The Salmon Relocation Advisory Panel

## Introduction – who you are / where you work / and your role

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~~/would not like to be heard by the hearings panel.

**Note:** There is no need to sign your submission if you are emailing it from your email address.

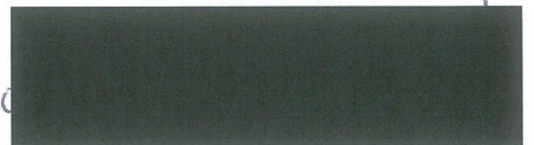
Name: I.W. Bluey Walker.

Date: 22/3/2017

I.W. Walker.

Email:

Phone:



## Written Comments No: 0443

Subject	<b>Submission on Marlborough Salmon Farm relocation</b>
From	<a href="#">Karen Walshe</a>
To	aquaculture submissions
Sent	Sunday, 26 March 2017 10:17 a.m.
Attachments	<<3. MEC salmon farm relocation proposal. main points for circulation. mar 23.docx>>

Karen Walshe

[REDACTED]

Blenheim

[REDACTED]

## Potential Relocation of Salmon Farms in the Marlborough Sounds

### COMMENTS FORM

Comments closes 5pm, 27 March, 2017

#### Your details

NAME: Karen Walshe

ORGANISATION (if applicable):

CONTACT PERSON:

POSTAL ADDRESS: [REDACTED] Blenheim 7201

EMAIL: [REDACTED]

DAYTIME PHONE: [REDACTED]

MOBILE: [REDACTED]

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

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

DATE: 26<sup>th</sup> March 2017

**I OPPOSE** the relocation proposal for the following reasons:



Issue	Comment
1. Process	<ul style="list-style-type: none"> <li>• The use of Section 360A of the RMA gives the Minister of Aquaculture the power to over-ride the Marlborough Sounds Resource Management Plan.</li> <li>• It takes decision-making and resource management away from the Marlborough District Council and local community.</li> <li>• 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.</li> <li>• The proposal provides commercial benefit for one company, using public water space for free, above the interests of other users of the Marlborough Sounds, including iwi.</li> <li>• 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.</li> </ul>
2. Precautionary approach	<ul style="list-style-type: none"> <li>• Policy 3 of the NZ Coastal Policy Statement calls for a precautionary approach. This was reinforced by the BOI decision [par 179].</li> <li>• 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]</li> <li>• This especially applies to Tio Point, which would be the fourth salmon farm in close proximity in Tory Channel.</li> <li>• In the meantime reduce the feed and stocking rates at the low flow sites to meet the Benthic Guidelines.</li> </ul>
3. Nitrogen pollution	<ul style="list-style-type: none"> <li>• We dispute the accuracy of Minister's statement:</li> </ul>

	<p>“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.</p> <ul style="list-style-type: none"> <li>• The proposed relocation sites are not “existing aquaculture space”. They are <b>prohibited</b> to aquaculture.</li> <li>• While farm surface area may remain about the same, there is a proposed five-fold increase in fish feed to 24,600T a year.</li> <li>• 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.<sup>1</sup></li> <li>• 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.</li> <li>• 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.</li> </ul>
<p>4. Offshore Alternatives</p>	<ul style="list-style-type: none"> <li>• 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. <b>“Particularly where the applicant for a plan change is seeking exclusive use of a public resource for private gain.”</b> [SC 172-173]</li> <li>• 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.</li> <li>• Offshore alternatives are barely mentioned in this proposal. NZKS claims it would be achievable in 10</li> </ul>

<sup>1</sup> BOI [par 379] Nitrogen equivalent calculations

	<p>years but was too expensive and not yet proven. There is no information about what is happening in other countries and no cost-benefit analysis about off-shore alternatives.</p> <ul style="list-style-type: none"> <li>• 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.</li> </ul>
5. King shag	<ul style="list-style-type: none"> <li>• Policy 11 of the NZ Coastal Policy Statement calls for protection of indigenous species in the coastal environment.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> </ul>
6. Landscape and Cumulative effects	<ul style="list-style-type: none"> <li>• This proposal will degrade the Outstanding Natural Landscapes and High Natural Character values of the Waitata Reach. <sup>2</sup></li> <li>• 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]</li> <li>• 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</li> </ul>

<sup>2</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, page 75.



	can be justified.
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**Further comment:**

**Our environmental resources should not be freely used for the commercial gain of a few. Especially when that use results in degradation of that environment.**

**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: 0298

Subject	<b>Submission doc attached</b>
From	<a href="#">Malcolm</a>
To	aquaculture submissions
Sent	Thursday, 23 March 2017 9:25 AM
Attachments	<<170306-SubmissionForm King Salmon and the Sounds.pdf>>

To Submissions,  
Please find my submission doc per attached.  
Regards  
Malcolm Warnes

## Written Comments No: 0298

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: 0298

## 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	Malcolm Warnes		
Address	[REDACTED] Blenheim [REDACTED]		
Email	[REDACTED]		
Telephone (day)		Mobile	

<input checked="" type="checkbox"/>	I am against the whole Ministry for Primary Industries (MPI) proposal for "Potential Relocation of Salmon Farms in the Marlborough Sounds"
<input type="checkbox"/>	I would like to speak to my written submission at a public hearing in [REDACTED]
<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*

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.

## Written Comments No: 0298

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:

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

## Written Comments No: 0442

Subject	<b>To The Salmon Relocation Advisory Panel</b>
From	<a href="#">jason watene</a>
To	aquaculture submissions
Sent	Monday, 27 March 2017 9:59 a.m.
Attachments	<<Jason Watene.jpg>> <<Ullysess Ashby.jpg>> <<Jordan Eagle.jpg>>

Hi,

I have attached 3x submission for the Salmon Farm Relocation Advisory Panel in favour of swapping the low flow sites for higher flow sites.

I am fully supportive of NZKS as for the last 8-9yrs, the stability of work at NZKS has allowed me to purchase a house in Marlborough and raise my two small children (8&6) in a stable, loving friendly atmosphere. They have been able to participate in many extra curricular activities and enjoy a very stable consistent home life with both parents. This would not be possible anywhere else in NZ with the skillset I have (Commercial Diving Qualifications).

Kind Regards

Jason Watene



## Written Comments No: 0442

Salmon Farm Relocation

Ministry for Primary Industries

Private Bag 14

Port Nelson

aquaculture.submissions@mpi.govt.nz

To: The Salmon Relocation Advisory Panel

### Introduction – who you are / where you work / and your role

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.

### What will this mean to you, and how will this affect your community or organisation?

My name is Jason Watene. I have been living in Marlborough for 8-9 yrs with my two small children (8 & 6). Both children have grown up here & have participated in many extra curricular activities within the community. NZKS has allowed my fiancée and I to provide a very stable family life. As a family we frequent the Marlborough sounds in our family boat & I am proud to show them how NZKS is trying to work within the community & environment while providing families with a financial benefit which aids this small community.

~~I would~~ would not like to be heard by the hearings panel (please cross out the option that does not apply to you).

All written comments must be received by MPI no later than 5pm on Monday 27th March

Name: Jason Watene

Email:

Organisation/Company: New Zealand King Salmon

Phone:

Role: Field Team Manager.

Date:

## Written Comments No: 0227

Subject	NZ King Salmon Farm Relocation Submission
From	[REDACTED]
To	aquaculture submissions
Sent	Thursday, 16 March 2017 8:25 a.m.
Attachments	<<SubmissionSalmonFarmRelocation.docx.pdf>>

Hi

Please find my submission attached supporting the potential Salmon farm relocation process

Regards

*John Waterman, Accounts Clerk*



[REDACTED] | W: [www.kingsalmon.co.nz](http://www.kingsalmon.co.nz) | [REDACTED]



ORA KING™

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# Written Comments No: 0227

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 John Waterman and I am an employee at NZ King Salmon working in the Finance Department

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.

Regards

John Waterman



Subject	Salmon Farm re-location submissions
From	[REDACTED]
To	aquaculture submissions
Sent	Wednesday, 22 February 2017 1:35 p.m.

Mr. Chris Waters  
Bachelor of Aquaculture and Marine Conservation student  
N.M.I.T.

[REDACTED]  
To Whom It May Concern,

I would like to make a generalised submission regarding the proposed re-location of low flow salmon farm sites.

Having perused the publicly available documents, my submission is to relocate four of the six proposed farms. The two Crail Bay farms would, in my view, be best relocated upon monitoring of the other four farms, no less than one full calendar year after the final of the four other farms have been fully operational.

All salmon farms listed which consistently exceed ES5 levels cannot be expected to improve, based on current stocking levels. As stated, significant losses are forecast upon stocking at levels which would meet the proposed Benthic Guidelines. Therefore, NZKS has no choice but to relocate the farms.

Of some concern is the value your independant scientific reports place on landscape values and natural character - with regards to proposed alternative sites. The reports suggest that the sheer scale of such natural features is sufficient to disregard changes in visual impact upon introducing salmon farms. I would suggest - for example - that a change in such ratings from "high - moderate" to "moderate" is significant. Both Blowhole Point sites are of particularly high standards and are also close to reef beds. These two sites should be assigned to the relocation of the (delayed) Crail Bay farms.

Rigorous monitoring of environmental impact at the Richmond Bay South site - once farmed - would enable better decision making over whether the Blowhole Point sites are suitable for salmon farming at all.

Based on some previous history of enrichment beneath Clay Point Salmon Farm, along with the close proximity of the proposed Tio Point farm with Te Pangu, I also have some concern about the location of the proposed Tio Point farm. I have limited knowledge of alternative potential sites in the Tory Channel but would want full assurances that this is the best site possible.

Thankyou for taking the time to consider my submission.

Yours faithfully,

Chris Waters

## Written Comment No:0543

Subject	<b>Potential Relocation of Salmon Farms in the Marlborough Sounds</b>
From	<a href="#">Evaon Watkins</a>
To	aquaculture submissions
Cc	Evaon Watkins
Sent	Monday, 27 March 2017 3:54 p.m.
Attachments	<<Potential-Relocation-of-Salmon-Farms-in-the-Marlborough-Sounds-Feedback-form-Word-version.docx>>

My name is:

Mrs Evaon Faye Watkins,

[REDACTED]  
Picton 7250

Phone [REDACTED]

email: [REDACTED]

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

Thank you.

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The Potential Relocation of Salmon Farms in the Marlborough Sounds:  
Feedback form

Written comments must be lodged by 5pm on Monday, 27 March 2017.

Comments can be:

- emailed to [aquaculture.submissions@mpi.govt.nz](mailto:aquaculture.submissions@mpi.govt.nz)
- posted to  
**Salmon Farm Relocation**  
**Ministry for Primary Industries**  
**Private Bag 14**  
**Port Nelson 7042**

### Consultation questions

These questions are designed to stimulate your thinking and help us report back clearly on people's written comments. There are also spaces after each question on the feedback form for additional comments. These questions are the same as those in the consultation document.

Please make sure it is clear which aspect of the proposal (including question number if appropriate) you are commenting on.

MPI will consider all relevant material made in your written comments, so you are welcome to provide information supporting your feedback. Please make sure you include the following information in your written comments:

- the title of the consultation document
- your name and title
- your organisation's name (if you are submitting on behalf of an organisation), and whether your written comments represents the whole organisation or a section of it
- your contact details (such as, phone number, address, and email).

### Written comments are official information

Please note that your written comments are official information. Written comments may be subject of requests for information under the Official Information Act 1982. The Official Information Act specifies that information



## Written Comment No:0543

is to be made available to requestors unless there are sufficient grounds for withholding it, as set out in the Official Information Act.

Persons who make written comments may wish to indicate grounds for withholding specific information contained within their feedback, such as if the information is commercially sensitive or if they wish, personal information to be withheld. The Ministry for Primary Industries will take such indications into account when determining whether or not to release the information.

### Public hearings

A Marlborough Salmon Farm Relocation Advisory Panel will hold hearings in April. These hearings will allow people to speak to their written comments.

If you would like to attend a hearing and meet with the panel, please let us know as part of your written comments, including which location you would prefer.

Once we receive your written comments and your request to meet with the panel, we will notify you of the date, time and location.

yes <input type="checkbox"/>	I would like to speak to my written comments at a public hearing
<input type="checkbox"/>	I do not want to speak to my written comments at a public hearing

## Questions

### Question 1:

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

**No, definitely not, I do not support this proposal in any form. NZKS should go through the correct channels and should have applied to do this when they submitted to the Board of Inquiry. Something underhand here as timing would indicate that identifying new sites was already underway prior to applying to the Board of Inquiry. Can MPI just bend the rules when pressure goes on from a large company.**

**The community is not backing this move – we are a democratic country – you need to listen to the people, not to a company which is significantly owned by overseas interests. This is a single private company which is making its money through the use of free public waterways.**

### Question 2:

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

Any potential sites should not be in the Marlborough Sounds they should either be landbased or in Cook Strait.

### Question 3:

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

**None. These farms shouldn't be allowed in the Sounds full stop, but in some ways the low flow sites are the better of the two evils, in a low flow site the waste falls to the bottom, this forms an anaerobic build up underneath the farms that in time give off methane gas, phosphorous and other toxins that eventually become anoxic, the lack of oxygen will kill their own fish, if it is not already.**



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**Question 4:**

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

Every one of the existing sites has been polluting the waters underneath with tons of nitrogen – why would you let NZKS dictate they want to move and pollute further pristine sites.

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**Question 5:**

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

**Surely it is quite obvious that any benefits of this whole proposal would go to NZKS, and obviously the fact that they are not even a 100% New Zealand owned company means they are using our pristine waters because no one else would give them any.**

**You must realise there are no benefits to the environment or recreational enjoyment of the public. They are a scourge on the landscape.**

**Question 6:**

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

Should the relocation go ahead, Tory Channel will have four farms in close proximity plus a new mussel farm. There has already been inconsistencies and errors in the relocation proposal which were emailed Errata – the change in the surface structure area has increased from .5 to .739 which is an increase of 26% for the Tio Point site. Albeit a “typo”. This gives little confidence for the rest of the proposal or the fact that further resource consents can be made, as in the Clay Point farm, which in November 2016 was given approval to move the surface structure area further into Tory Channel by 30m, is this an approximate or is it really 40m – who measured it and how was it measured. What conditions will be placed to ensure these farms cannot have their surface structures increased or moved within the areas.

Deposition of farm waste is the primary driver of seabed impacts from finfish farms, At dispersive sites, like Tio Point, approximately 13 kg of solids m<sup>-2</sup> yr<sup>-1</sup> have been shown to produce a state of very high enrichment with an overall ES of 5 which is currently considered to be the maximum level of acceptable seabed effects beneath salmon farms in the Marlborough Sounds .



If this level is already at the maximum, testing and monitoring needs to be on a very regular basis, such as six monthly, and this information needs to be readily available to the public and publicly advertised.

**Question 7:**

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

**Definitely not, no site should be approved unless it has been through a fair, transparent and robust RMA process. Reporting must not have inconsistencies and errors.**

**Question 8:**

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

Surface structure areas of the farms should not be increased at all.

Disappointing to note that the Tio Point relocation site has just had its surface structure area increased from .5 to .739 already even before it has gone through any process - this is an increase of 26% and someone has just done it and called it an "Error" when it is a blatant attempt to fabricate this already one-sided tainted report, full of probable inconsistencies and errors.



**Question 9:**

If the sites at the existing lower-flow farms (other than Crail Bay MFL032) are vacated, do you believe that marine farming should be prohibited in these sites or do you think that these sites should remain open to other types of aquaculture for aquaculture settlement purposes?

**Aquaculture is robbing the public and is only benefitting the operator and in the case of NZKS this operator is not even a New Zealand company. Any vacated space, for whatever reason, should be returned to the public domain.**

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**Question 10:**

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

**Just pay them compensation, like you have done in many cases before.**

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**Question 11:**

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

No. To the east of the Tio Point relocation site, there is a significant reef, which harbours the ecologically important giant kelp which is the feeding ground for Paua and is a significant fishing hole for recreational fishers targetting blue cod. According to a DOC report, paua and kina are herbivorous animals and are inefficient feeders and require a high daily feeding rate. It's a no brainer that the staged adaptive management of putting uneaten feed, fish faeces and nitrogen into the water is going to



destry this sensitive reef and all who make it their home. Even the Hudson-Associates report states "other reef communities will be affected by farm deposition". Can we really trust any monitoring which will be done – will there be inconsistencies and errors which are not passed on to the public. How long do we wait..do we wait until the reef is destroyed by toxins and nitrogen in the water, and let NZKS profiteer from farming salmon while the natural resources which are shared by the public are lost.

**Question 12:**

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

Obviously the regulations have been created for the benefit of NZKS and there is nothing democratic about this process at all. I do not agree.



**Question 13:**

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

That they have been able to get away with negligence for so long , that it is ok to foul the seabed and water column and pull-the-wool over the MDC's eyes for many years that they are meeting their obligations.

**Question 14:**

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

Really it is all about the greater profit for NZKS as to which farm is relocated, nothing to do with a public priority. (Not a good question and you should ask NZKS they will have the financial figures as to which one is a priority move).

**Question 15:**

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

We are permanent residents in Motukina Bay, less than 1km from the proposed Tio Point site. We watch on a regular basis at least 3 times a week, an inbound and outbound ferry crossing at Motukina Point, the narrowist



space in the channel, being only 980m. You are wanting to mitigate navigational emergencies yet you are allowing the Tio Point farm to encroach into Tory Channel and you have allowed the existing Clay Point farm to move their surface structure 30m further into Tory Channel. We have an accident waiting to happen here, this is basically State Highway 1 our major ferry route, and your report mentions navigational risks can be adequately mitigated and in fact your report goes as far as saying it would have very limited impact on navigation. We know the number of times the ferry has to sound its warning horn for vessels which are in its path and will this be your idea of mitigating a fatal hazard. The Channel is assessed as a High area of activity, and according to your Relocation documents this is approximately 10 vessel movements per day. As mentioned, we live at Motukina Bay permanently and this vessel movements figure is more in the vicinity of 60 (to start with 5 ferries with 3 sailings per day that's 30 crossings) numerous salmon farm work boats and barges and these will only increase should the Tio Point farm proceed, plus we have in the vicinity of 20 recreational fishing boats in the Channel on any day, plus on average 3 sailing boats coming in from Wellington, plus fishing boats taking catch into Picton daily. To even cause more hazards, the reknown Motukina Point fishing hole is not only a favourite for Charter Fishing boats but also for the public in general, and in summer can have up to 4 smaller boats fishing at any one time. I guess what I want to say is, your figure is inaccurate and as far as navigation goes it is going to be a game of dodgems.

According to the Marlborough District Council Environment Places and Values documents, Tory Channel displays a HIGH Abiotic, Biotic and Experiential natural character value, for the complete Channel apart from the Heads which is VERY HIGH. MDC go as far as documenting Tory Channel as having Unique Natural Character. Do you think it will still have this rating after you allow another salmon farm to relocate here.

On the east of the Tio Point proposed relocation site, there is a band of significant reefs, as pointed out in all your documents. You have not taken into account the abundant kelp forests which harbour a very healthy paua population. Very little has been written in any report on the paua in these reefs. The Fast Ferry had a significant adverse effect on the paua numbers, there has been a recovery but the introduction of the Kaitaki in 2005 means there are again adverse affects on the paua, they are still trying to rebuild. What effect will this intense salmon farming (4 farms in close proximity plus



the likelihood of a further mussel farm in very close proximity) have on this already stressed resource. According to the NZ National Geographic website, paua are densest around headlands, they suggest because the swirling waters do a better job of mixing the eggs and sperm. Paua require very specific conditions – clean seawater for a start. They won't tolerate freshwater intrusion or silt, particularly the juveniles. They go on to mention the outer Marlborough Sounds as being particularly suitable. Motukina Point is a headland, Cawthron Institute have already stated the potential Tio Point site is situated beside a depression that, depending on the hydrodynamic features around the nearby headland, may accumulate deposition from a finfish farm. By the time monitoring is completed after three years of full feed discharge there will be no juvenile paua left. As we have lived at Motukina Bay for 14 years, prior to Te Punga, prior to Clay Point and Ngamahu – there were significant kelp forests and a healthy paua bed in the reefs alongside these farms – our own baseline survey indicates that these forests and paua have disappeared.

What standards or management procedures for testing of the Motukina Bay reefs are in place and who is the person to take responsibility for the loss of these amazing healthy reefs we hope to pass on to our grandchildren.

Why is there not more documentation on paua and the effects the deposition will do to them – I have requested on three occasions details from MPI and the only mention I have is of a Dive on Motukina Benthic Part 1 (which is a site that has now been abandoned).

According to the BOI Paragraph 379 –

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.<sup>1</sup> Obviously different rules for different folk as the Marlborough Environment draft plan is wanting boaties to be a kilometre from shore, rather than 500 metres before discharging their untreated waste.

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<sup>1</sup> BOI [par 379] Nitrogen equivalent calculations



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**Question 16:**

Are there particular landscape or natural character values that you want to identify to the Minister for Primary Industries for any of the potential relocation sites?

According to the Marlborough District Council Environment Places and Values documents, Tory Channel displays a HIGH Abiotic, Biotic and Experiential natural character value, for the complete Channel apart from the Heads which is VERY HIGH. MDC go as far as documenting Tory Channel as having Unique Natural Character. I am sure the Minister is aware of this as many tourism documents state that once you enter Tory Channel you are at the Gate Way to the beautiful Marlborough Sounds. It doesn't sound as good, if they had to advertise, that this *"used to be the gateway to the beautiful Marlborough Sounds before NZKS destroyed this by intensive salmon farming"*. We are just back from Shanghai, China, our 26 year old driver said he has not seen the sun or the stars for 15 years and now the government is desperate to change this but does not know how. Will the Ministers grandchildren be saying this.

What is the Ministers vision for the future of the Sounds – is he prepared to nurture what we have or is he just bending over under pressure from a company with a lot of power like NZKS.

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**Question 17:**

Are there other effects on landscape and natural character not outlined in the Hudson Associates or Drakeford Williams reports that you would like the Minister for Primary Industries to be aware of?

**As mentioned previously, we are residents in Motukina Bay. In all the reports I have read the best mention we receive is “there is a dwelling/holiday home”. Can I please note here that we have owned our property for 14 years, we have invested \$2million in our lifestyle and commute to and from our property regularly. Our house sits on 5589m2 of land which is covered in native manuka and kanuka trees. We do not own any of the pine plantation although battle with a few wildling pines which are being removed. Should this proposed Tio Point farm go ahead we will be able to see all three farms Tio Point, Clay Point and Ngamahu by sitting on our deck. Is this a limited adverse effect or would it just be rated as an adverse effect. We have the reknown Mail Boat deliver mail two days a week – all those overseas tourists who take photos will now be able to see three intrusive salmon farms as they approach our property – so much for looking after the natural landscape and the natural character of Tory Channel which does have a rating of high abiotic, high biotic and high experiential natural character values – or does that no longer matter.**

**Question 18:**

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

**Salmon farms and mussel farms, remain an out of control blight and scourge on the seascape. Any structure that is not in its natural environment is simply alien to its surroundings and over time should be removed, to return the seascape to its original state.**



**Question 19:**

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

We are very concerned about the long term effects and the damage this will do to any reefs, particularly in Tory Channel as there are reefs all around the proposed Tio Point site and have been identified as:

According to Cawthron - Directly beneath the farm cages (< 1 ha), deposition will reach a level where ES 5 impacts may start to occur; i.e. the maximum level of acceptable seabed effects beneath salmon farms in the Marlborough Sounds (Keeley et al. 2015b). Sediments may become highly enriched, the infaunal community diversity will be significantly reduced, a high abundance of opportunistic taxa (i.e. capitellid polychaete worms and nematodes) are expected, bacterial mats (Beggiatoa) are usually evident and there may be hydrogen sulphide out-gassing on disturbance (Keeley et al. 2013b).

I think this report by Cawthron sums it up - this is the acceptable maximum level of seabed effects beneath salmon farms - and that is their starting point!

According to MPI Overview of Ecological Effects of Aquaculture report with consent conditions being specified at enrichment Stage 5 – that this is the maximum allowable standard at the zone boundaries, and any breach of this standard could then require a decrease in feed levels or the fallowing of the farm.

An independent monitoring of this level needs to be taken, and I would like to know how quickly can NZKS follow a farm should this level increase above 5.



**Question 20:**

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

How can you think about mitigating adverse effects when you are thinking about allowing intensive feeding of farmed salmon.

**Question 21:**

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

Monitoring! Cawthron has already said levels are at a maximum – maximum is maximum. There would appear to be no tolerances for accidents with maximum. Its hard to get back what you already have.

With farms located in high flow sites, only 10% of the waste falls to the bottom, the other 90% gets distributed all around the sounds by the flood tide. In 6 hrs a toxic algae bloom will travel the length of the Sound. This has been proven. The nitrogen enrichment will result in the only creatures living in the Sounds will be Algae blooms and jelly fish, you will be creating a Dead Zone, this has happened in the Adriatic, The Gulf of Mexico, The Sea Of Japan, why would it not happen here.

According to MPI – Overview of Ecological effects of Aquaculture -

The intensity and spatial extent of enrichment is highly site specific, with high flow, deep sites producing larger but more diluted footprints. Which really means the pollutants are still being distributed, only faster and further afield. They go on to say -

The depositional footprint of a typical finfish farm extends tens to hundreds of metres from the cages.

**Question 22:**

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

The Tio Point site is of immediate concern to us. As mentioned above, we are permanent residents. We have a localised eddie which sits in Motukina Bay with the mentioned reefs on either side. According to MPI's Stephanie Hopkins,

“There is little scientific information on the bathymetry and localised water currents within Motukina Bay, but I note you have observations that suggest there are such current eddies.

In the absence of realtime data (such as from current meters in multiple



locations within the bay), the local movements in the bay are not well known. If your concern is the far-field deposition of farm-derived nutrients concentrating in Motukina (due to a potential local eddy), your written comments on the proposed Tio Point site could emphasize this uncertainty and propose monitoring within the bay to address this risk.”

Stephanie has not been to our property and has no knowledge of the eddy. We can waterski in front of our property when there is a blowing southerly. The sea is flat and is not disturbed. She speaks of no realtime data – we are real and we observe.

According to Cawthron Institute, the potential Tio Point site is situated beside a depression that, depending on the hydrodynamic features around the nearby headland, may accumulate deposition from a finfish farm. Monitoring at the nearby depression after three years at full feed discharge would determine if accumulation and excessive enrichment were occurring. This secondary deposition, which is re-suspension and re-deposition of fish farm material is apparently not well described by DEPOMOD and may lead to localised patches of enriched seabed. I would like to stress that three years is a very long time to bombard this sensitive reef with toxins and nitrogen, any lay person can see that these deposits will swirl around in the bay and come to rest, smothering life in these reefs. After three years, there will only be sand and rocks left. Cawthron has honestly reported that it is all dependent on the hydrodynamic features around the nearby headland. This reef is very significant and monitoring of the water column needs to be done monthly to see if farm-feed is affecting any levels in the Bay. Should there be any change to the limits as set out in Cawthrons reports – farming must be ceased immediately..

Regular monitoring of this site needs to be addressed before you lose what you already have – three year monitoring is just pathetic.

With 30 ferry movements per day, and each ferry having to broadside at the dangerous Clay Point/Tio Point bend, this will wash accumulated deposition which may well give incorrect readings. With no monitoring in Motukina Bay the effects from the hydrodynamics of the headlands and the ferries is unknown on these important and significant reefs.



**Question 23:**

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

The Cawthron Institute also states in their September 2016 report that habitats inshore of the proposed farm were typical of Tory Channel and included reef communities that may be affected by farm deposition and did go as far as saying some indications of enrichment have recently been observed. If they were confident they were not going to be affected, they would have reported “they will not be affected by farm deposition”.

Any future monitoring plan should include all reef communities and especially the depression to the east of the Tio Point farm to ensure enrichment effects remain minor.

**According to MPI reports - we have healthy horse mussels living in the reef directly under the proposed Tio Point site – will they remain healthy once they are smothered in this mat which is going to be formed from fish faeces.**

**Question 24:**

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

You reference “potential sites” – this is a public water way. The obvious remedy is to place salmon farms on shore, where all costs are to the operator, not the ratepayer or environment.

According to the ABC.net.au report Sweden has just banned marine-based salmon farming and is demanding that the industry move everything onshore within three years. Do you think maybe we should listen to Sweden, they are 20 years ahead in the industry and experience must count for something! Landbased salmon farming is being introduced around the world including United States, Denmark and on the Chinese-Mongolian border.



**Question 25:**

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

**Yes, all the negative effects on demersal fish, our paua beds, shellfish, worms and horse mussels. A lot more studies need to be conducted, peer reviewed on all proposed sites within the Marlborough Sounds.**

Your questions have not covered demersal fish species in particular blue cod and I asked MPI this question at the drop-in meeting.

The maximum age of blue cod is 32 years, and the salmon harvested by NZKS are apparently 18 months old - has any testing been completed on mature adult blue cod, particularly their reproductive fitness and the long term effects this could have on our most popular Marlborough Sounds recreation - fishing? As we know they are eating the salmon pellets. The attached photo of a blue cod with a stomach full of fish pellets is of a major concern. Blue Cod are one of the main reasons families invest time and money into the Marlborough Sounds - to come fishing. Blue Cod are a sustainable fish (hopefully) and provide food for many families, unlike farmed salmon and it will be interesting to see if you are monitoring them, even though they are hardly mentioned in the Tio Point documents. I note other countries are now reporting liver problems in fish feeding on pellets.

MPI's answer to this question is very interesting:

We are not aware of any other NZ research completed or underway on how the existing finfish farms in New Zealand might affect wild fish populations in the vicinity of the farms.

Obviously, we need an immediate study to research the long term accumulative effects on the reproductive fitness of long living demersal fish species such as blue cod who reside in the vicinity of a salmon farm and feed on benthic invertebrates underneath the farms. We know that blue cod are territorial and live and breed where they are born but can travel up to 1.6km from this habitat. There is a large, well known, blue cod fishing hole right beside the proposed Tio Point site and according to Dr Tim Dempster's report he recommends that there should be no fishing within 100m of the cages. According to his report this will reduce the possibility of harvesting any long lived benthic fish species in the vicinity of fish farms that may acquire elevated loads of mercury due to their association with farm-impacted



sediments.

The report also identifies that sporadic, more substantial feed loss events can occur when control systems do not function properly. The loss incurred when the feed monitoring system failed during one feeding period was 4.7% - this is significantly more than NZKS reported figure of 0.1%. Human error or hiding inconsistencies and errors! NZKS cannot quote this figure without independent data on measurement of feed fallout. An independent monitoring of feed loss and variations in loss levels with location and time needs to be undertaken for any proposed and existing farm location.

**Question 26:**

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

**Honest studies should be conducted and peer reviewed and results made public. Covered in Q. 25.**

**Question 27:**

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

Honest studies should be conducted and peer reviewed and results made



## Written Comment No:0543

public.

**Question 28:**

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

Honest studies should be conducted and peer reviewed and results made public.



**Question 29:**

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

**Over the years we have seen Orca families in Tory Channel and also Hump back whales.**

**With the possibility of four salmon farms in very close proximity plus the likelihood of a mussel farm right beside Clay Point salmon farm, why would whales want to come in to Tory Channel, this is not an environment suitable to such beautiful creatures – having to navigate feedlot anchor lines, excessive noise, under water lighting. Any eco-tour business who follows the dolphins and whales in Marlborough Sounds may have to hang up their “out of business” signs.**

**According to MPI Overview of Ecological Effects of Aquaculture - While marine mammal attraction to farms using submerged lights will be highly localised in its effect, the greater risk is potential entanglement.**

**Question 30:**

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

I guess MPI would know the answer to this one as should studies not have already been done?

**Question 31:**

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

**Most definitely yes, but this must be paid for by the operator, King Salmon, and independently peer reviewed. This should be mandatory .**

The salmon would need to be tested by an independent lab, which I believe is necessary overseas to determine the health of the fish.

**Question 32:**

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

How can intensive fish feeding be even mentioned in the same paragraph as salmon welfare and husbandry. This is no different than caged chicken farms or dirty caged piggeries. The only winner is NZKS.



**Question 33:**

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

I am commenting on the potential relocation to the Tio Point site in Tory channel.

We have a launch which we use daily/weekly to travel to and from our boat-only access property. I guess you are very aware that Tory Channel has five ferries that travel between Picton and Wellington daily which is 30 crossings per day. At least once every two days, we have two ferries crossing at the dangerous Clay Point bend, the ferries have to broadside around the bend plus be aware of all the supply vessels which are around the salmon farms, plus be aware of recreational fishermen who sit on the Motukina Point blue cod hole, but be mindful of our launch in front of Motukina Bay plus make sure they don't collide with any salmon farms. Is this what you are meaning by navigational effects that the Minister needs to know about, or is this better to be called an accident waiting to happen – we are all only human and all humans make mistakes.

**Question 34:**

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

I have no comments to make on this site as I am not completely familiar with it.



**Question 35:**

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

**There are many recreational values compromised by farm structures. Recreational boating is restricted in areas around farms and according to Dempsters reports access and fishing will not be allowed around salmon farms.**

**Working barges are a nuisance to tourism and local recreational boat movements, as they only serve the purposes of the farms. The farms are unattractive and out of character for a marine environment. Their adverse cumulative effects are more than minor – not what you want to see as you enter the Beautiful Gateway to the Marlborough Sounds. This is all about the operator and their profit – such shortsighted vision.**

**MPI reports state that Tory Channel is an area of low recreation – since Ministry of Fisheries has changed the blue cod take over the last few years, Tory Channel has become a high recreational area for fishing. There are so many misleading facts in these propaganda books we have been given to read.**

According to a recent Realtor, Tory Channel can expect a de-valuation to properties if another salmon farm is to be relocated here. To facilitate the Ngamahu Bay Farm, NZKS bought a property in the Ngamahu Bay, set up their salmon farm then subsequently sold the land for a pittance, thereby helping to devalue the surrounding land around the area further. How do you propose we get compensated for our loss of equity and enjoyment should a fourth farm go ahead?

**Question 36:**

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

**You cannot remedy or mitigate the presence of four salmon farms positioned at the gateway to the Marlborough Sounds – this is the Ferry**



route linking New Zealand and bringing in tourism to each island. Do not allow this additional farm, and remove the rest into the open sea or onto land - just like Sweden is doing.

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**Question 37:**

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

The dictionary describes “heritage” as – property that is or may be inherited. Our property in Motukina Bay is a legacy for our grand children to use and enjoy.

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The dictionary describes “values” as - a person's principles or standards of behavior; one's judgment of what is important in life:

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Does it really need to have a marae on it or can the minister understand a family home and the importance of being able to pass this on to the next generation to enjoy blue cod fishing in unpolluted waters, to have ease of access to a boat-access only property, to enjoy the fun of gathering paua. Or will these simple Kiwi traditions be gone forever to allow just one business to profit.

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**Question 38:**

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

That the proposed relocation to Tio Point should not be given approval – four farms plus a proposed mussel farm in close proximity all have extreme working noise which cannot be avoided, even down to hearing the workers speak to each other on a calm night.

When the work barges frequent the existing Clay Point farm we hear the steel against steel banging, from unloading and loading, all the while that the workboat barge engines are revved up to provide extra power to the cranes on board.

Just to mention here as well, the prevailing wind in Tory Channel is north-west, if the salmon farm is relocated to Tio Point, the north-west wind will blow over the farm and the stench will be upon us daily. We currently see clouds of feed dust float high into the air as the barges empty the feed bags into the hoppers. The dust which is also spread by the automatic feeders, contains chemicals that we do not understand the effects of on humans.

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**Question 39:**

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

The MPI Summary of AEE states that “Underwater lighting is also required as part of farm management and is used during the shorter daylight months (April to October). “ Maybe NZKS could give an explanation to MPI as to why the lights glow all year round from the two farms already in Tory Channel - Clay Point, Ngamahu. We have a direct line of vision to these two farms – they have a bright green (radiation looking) hue over the pens which is also another environment issue of loss of night sky darkness. This submission has to be presented before April and does this mean that we can expect this green hue to glow brighter for the next six months? These underwater lights are detrimental to the natural feeding patterns of native fish. A scientific study needs to be undertaken to describe the effects on native fish and in particular the juvenile paua – this should be mandatory.

According to the NZ National Geographic site, paua juveniles mainly feed at night and congregate together in social groups. Young paua are strongly photophobic and find places to hide during daylight. Definitely not conducive with Salmon farm lighting which as I have stated glows green every night. I cannot see juvenile paua living at Motukina Point if this proposed farm is relocated to Tio Point. Paua are an integral part of our heritage, they are part of being a Kiwi.

We have been informed that NZKS plan to use LED underwater lighting at their farms – does this mean 24 hours a day daylight for these already stressed farmed fish?

**Question 40:**

Social and community effects of the potential relocation proposal are wider than just residential amenity. What effects do you think there will be as a result of the potential relocation proposal?

We constantly see the salmon barge being used for farm staff fishing, they are catching blue cod from Motukina Point and using set nets – we have not put a complaint in to NZKS management in fear of retribution (they would definitely know which house the photos have been taken from). They leave



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the fishing until later in the day and travel across the Tory Channel with no navigation lights on. I personally feel intimidated by staff lurking around the reefs with no lights on.

Should another salmon farm relocate to Tory Channel there will be more farm staff fishing an already pressured environment.

The cumulative effects of concentrated industrial built structures, all grouped within close proximity of each other does not blend in with the “Clean Green” theme which is used to promote New Zealand. NZ King Salmon on their website refer to their salmon being raised in arguably the cleanest rearing environments in the world – from crystal clear waters to the majestic marine environment that is the Marlborough Sounds. Maybe this is what was said of Macquarie Harbour – but look at the mess they are in now. NZKS are only loaning this majestic environment, using and abusing its splendour – make them relocate to onshore facilities like they are demanding in Sweden. Sweden boasts to be 20 years ahead in their salmon aquaculture – we need to take a lesson.



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

One day the Minister will not be in Government and he will reflect on his time in parliament, with all this power, and say to himself, and maybe his grandchildren, what he was most proud of during his time in office. Which decision will he be most proud of!

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

