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

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Written Comments No: 0266

Subject	Site Relocation
From	[REDACTED]
To	aquaculture submissions
Sent	Monday, 20 March 2017 1:50 p.m.

To whom it may concern,

I am sending this email in support of the relocation of the salmon farms in the Marlborough Sounds. This can only mean progress for the Aquaculture Industry and a healthier environment in the Sounds.

These farms produce the finest salmon which I have been consuming for years and hope to do so for many more. Another very important factor is the creating of new jobs in the area. I do not wish to go before the panel.

Regards

Deb Gillard

Written Comment No: 0519

Subject	Comment on the site relocation proposal
From	Mark Gillard
To	aquaculture submissions
Sent	Monday, 27 March 2017 4:31 p.m.
Attachments	<<ALH-247141-126-668-1 (Mark Gillard NZKS Site Swap Submission March 2017).docx>>

Please find attached my personal comments on the salmon farm relocation proposal.

My contact details are below.

Mark

Mark Gillard, *Sustainability Manager*



1

2



A: 93 Beatty Street, Tahunanui, 7011



ORA KING™

Subject	Site swap proposal
From	Mark Gillard
To	aquaculture submissions
Sent	Friday, 24 March 2017 12:46 p.m.

Please find attached a personal submission on the salmon farm relocation proposal.

My contact details are below

Regards

Mark

Mark Gillard, *Sustainability Manager*



P:



| W: www.kingsalmon.co.nz | A: 93 Beatty Street, Tahunanui, 7011



ŌRA KING™

Salmon Farm Relocation

Ministry for Primary Industries

Private Bag 14

Port Nelson

Submission: Potential relocation of salmon farms in the Marlborough Sounds

INTRODUCTION

My name is Mark John Gillard I am the Sustainability Manager for The New Zealand King Salmon Company Ltd (NZ King Salmon). I have been employed by this company for over 31 years.

The views in this submission are my own personal views and not necessarily those of NZ King Salmon.

I began in the salmon industry over 37 years ago. My first job was running an ocean ranching development project on the Clutha River for ICI and Watties Industries. This was where I began to see a future for salmon production in New Zealand and it was during this time that net pen farming began at Stewart Island.

Prior to salmon, I was involved in the wild eel industry in various roles for 5 years.

I have made a career in the salmon industry, it has provided for myself, my wife and two now grown up children.

Both of our children went to French Pass School. I was on the first board of governors for that school. Our daughter went to Marlborough Girls College for a couple of years as a boarder, then Nayland College in Nelson when I was transferred to NZ King Salmon's head office in 1994. Our son went to Broadgreen Intermediate, then Nayland College also.

I have a relatively intimate knowledge of the Marlborough Sounds having spent time living, boating, diving and driving in the area as part of my employment and private life. As you can see, we have been part of the Sounds and northern South Island community for a large number of years. I would not have been if not for the salmon industry.

Our son now works for NZ King Salmon in the processing plant in Nelson. He relies on that job and is dedicated to the company. Our daughter also worked for the company during university holidays.

I am indebted to the industry for providing me with a career that enabled me to get paid to work without feeling that I was actually working, at least for a significant amount of the time. The industry is so interesting and challenging that it gets in your blood. I would recommend it to anyone.

It has been demanding at times, yet rewarding, and the lessons learned along the way by all of us in the company have contributed to what is now an established and well regarded company providing a premium quality product to the local and overseas markets.

I chaired NZ Salmon Farmers Association for over 17 years and was a founding member and Director of Aquaculture New Zealand. I was deputy chair for a number of years.

I have contributed to a service organisation having been a member of Rotary International in Balclutha and in Nelson. I was President for one year. I am also on the board of the Sport Fishing for Youth Charitable Trust in Nelson.

I whakapapa back to the first maori waka (Tainui). I am Ngati Raukawa. I struggle with people who have not been in the Marlborough Sounds nor New Zealand for long trying to impose their own ideals on what we do. Often these ideals are based on inaccurate information or out of date internet searches.

HUMBLE BEGINNINGS – THE SALMON INDUSTRY

The NZ salmon industry has transformed from its humble beginnings into a world class industry.

If the panel are of a mind to understand some of the history behind the industry, can I suggest they read "Swimming Upstream" by Jenny Howarth. This is a book commissioned by the Salmon Farmers Association to record its growing pains and gains. NZ King Salmon has a few copies available.

I came to the Marlborough Sounds in 1985 to run a pilot scale salmon farm. In those days we didn't really know whether salmon farming would be successful, but have now proven beyond a doubt that it can be.

My family and I were based in Hallam Cove in the outer Pelorus, where we first started marine salmon farming. As we now know that area has its problems for salmon farming, especially over the warmer summer months and with its relatively low flows and shallow depths.

We began farming hands on with small 10m x 10m pens supported on mussel floats, with nets made by the locals (including my wife) on the tennis court in front of our house. Nets were changed by hand and manually waterblasted on a regular basis. Our farm service vessel was a 3.4m Parkercraft and feeding was by hand from 30kg paper bags.

Compare those humble beginnings to today: we have come a very long way. The industry is now extremely sophisticated across a range of technologies and management processes. The investment in structures and growing fish is huge compared to those early days but, as with all primary industries, the risks remain much the same. People are surprised when they visit our facilities as to just how advanced we are in all we do, including environmental management, especially compared to other industries.

Industry progress wasn't without its difficulties and, as with most primary production, it has its moments. In the early days we suffered from high summer mortalities, poor fish performance and high maturation of our stocks. Today those issues have been predominantly addressed and we are now able to produce year round supply of relatively even sized, high quality fish, fetching very good prices. That is not to say we don't on occasion have problems, as with all primary production.

Production of premium salmon is a far cry from when we started, we had seasonal supply of variable sized fish that were at the bottom of the pricing scale compared to other salmon. We were price takers. Now we set the standard and fetch prices exceeding other national and international

suppliers. I am indeed proud of where we have got to and there is more to come if we can get better rearing space. This better space will provide for a more sustainable and better environmental outcome. A win-win for all parties.

Most of the early salmon sites were converted from mussel sites. Had we known at the time we would have focussed more on obtaining space better suited to the species, but we did not know what we did not know. Over the years it has become clear that the early sites are sub-standard, many of these have not been used for many years, such as those in Hallam Cove that were vacated in the late 1980's.

Some hard lessons have been learnt: how to manage warmer summer periods, how to manage the farms as a whole rather than individually, how to reduce maturation so it is no longer significant, and how to understand what is required in a salmon site for it to be environmentally, socially and economically a good site.

Eventually I believe we will be farming offshore in conjunction with inshore, but that is a number of years away as the technology is not there yet and the risks in what will be extreme conditions have not yet been solved. Five minutes of extreme conditions may be enough to destroy a farm with associated millions of dollars of losses, not to mention the potential risk to vessels and staff. We need to be absolutely sure when we do go offshore that these risks have been addressed. That time is not now.

My time in the industry has been tremendously gratifying, we have come a long way, NZ King Salmon has many times been leading the way in developing new techniques and technology. We are often the guinea pig, not only in the marine environment, but also through our experiences in using and contributing to changes in the legislation and in freshwater smolt production, processing and marketing.

THE POLICY ENVIRONMENT

I have been involved in at least three reviews of the marine farming legislation. I am now involved with National Direction for Aquaculture, which MPI is currently leading. We still haven't managed to get it right, but there has been a huge amount of effort expended by a lot of people, industry and government in trying to improve the policy and regulatory environment.

The reason we are involved in this current process is because we definitely haven't got it right in Marlborough.

The Marlborough Sounds Resource Management Plan does not provide for appropriate water space that suits the relevant species (salmon) and I believe for primary production to be successful anywhere the requirements of the species must be paramount. If one does not have the right rearing conditions then you are set to fail. New Zealand has a wide range of primary production species that clearly demonstrate this. Several finfish species, including snapper and Kingfish farming that were attempted in the Marlborough Sounds, are but two examples. Salmon rearing attempts on Inner Sounds sites also add to that list.

Based on my experience, I firmly believe the industry has a very bright future if appropriate rearing sites can be used. The benefits to the Top of the South could be significant and proportionately greater for Marlborough if all sites are relocated.

As I have outlined already, I was instrumental in setting up the first farms for the company in Hallam Cove then moving further out to Waihinau, Forsyth and Port Ligar as we came to realise the Hallam sites were not ideal. I believe this current relocation process being led by MPI is a continuation of what we began when we moved from the inner sounds. The search for the most appropriate sites for salmon farming began back in the pioneering days. Back then it was based primarily on trial and error. Now we have the benefit of experience, science, and collaboration with many experts and stakeholders. The philosophy behind this proposal is not new.

THE SITE SWAP PROPOSAL

I was the NZ King Salmon lead in the EPA processes that granted 3 new farm sites and have been actively involved in looking for new sites for many years. I am sure suitable sites are very few in the Marlborough Sounds and this may be the last gasp for new salmon space in the Sounds should this process led by MPI be successful. To clarify however, there are sites suitable for the species, but competing uses makes availability extremely contentious and potentially so difficult to apply for that they are effectively non-existent.

I have been party to the site selection process carried out for the sites being consulted on and believe they are better for farming salmon than our lower flow sites.

In my opinion if we can move from the lower flow sites of Crail Bay, Forsyth Bay, Otanerau Bay, Ruakaka Bay and Waihinau Bay to those proposed there will be major benefits environmentally, socially and economically.

Environmental management both from a company and from a Marlborough District Council (MDC) perspective will become easier and more effective as the standards under Best Management Practice Guidelines: Benthic (BMP) are adopted. The BMP was developed by local and international scientists, MDC, NZ King Salmon and the public, and sets the rules that all parties will comply with. That must be a better situation than what we currently have, where there are a range of consent conditions across the sites. The status quo is confusing, inefficient and costly to implement and enforce.

A key attribute of a successful relocation process will be the creation of a large number of additional jobs. This has to be a major improvement for the Top of the South and especially Marlborough, as NZ King Salmon has proposed carrying out primary processing in Marlborough. On the contrary, if the site relocation is not successful the implications for job losses are serious. NZ King Salmon will need to adopt BMP on sites that are not suited and production will consequently be seriously reduced from current levels.

All of the proposed sites have been chosen to minimise the potential interactions with other users, ecologically special or sensitive areas and to minimise as best as possible other issues. No current or

proposed site is issue free, but care has been taken by MPI to propose sites that are as issue free as can reasonably be expected.

From a social perspective moving the farms away from residential areas is an improvement. Having the farms in more isolated areas reduces the opportunity for interactions with residents. Creating more jobs benefits the local community socially across the Top of the South, including Marlborough.

In my opinion the potential economic benefits are so obvious. The PWC Economics report confirms this. Rearing fish in a better environment has proven to be beneficial; the results from the recently harvested Waitata farm compared to Waihinau demonstrates this. Fish health has improved and mortalities considerably reduced. I believe the NZ King Salmon submission may deal with this in more detail.

Conservative Modelling

I am familiar with each of the proposed sites and believe the proposed sites, especially the three in the Outer Pelorus, are much preferred from a fish farming perspective. Seabed characteristics, especially at the central Waitata site, are pretty devoid of anything significant, I have viewed the videos taken when potential sites were being identified. I believe from a fish farming perspective this is potentially the best site in Pelorus Sound.

A key aspect to be taken into consideration at the central Waitata site is that depomod modelling identified that it could potentially be possible to discharge up to 12,000mt of feed and remain within the ES5 standard (ie. consistent with BMP). The current proposal however is only for 7,000mt, a significant reduction which gives by default a significant safety margin. I believe the effects on the seabed will be very minimal, even more so given that the starting feed discharge is proposed to be 3,500mt. The scientists can confirm that.

MPI has taken a conservative approach. All of the proposed sites, except Tio Point, are starting at 50% of calculated feed discharge for achieving ES5. This is quite a way below the calculated assimilative capacity, so should give a good degree of comfort to all parties that BMP standards can be complied with.

Priority Ranking of Site Relocation

I have read through the proposed objectives and policies. Detailed comment will be included in the Company's submission; however, I don't believe MPI's priority ranking of site relocation is in the best interests of NZ King Salmon. This will be addressed in more detail by others, but I believe the priority from highest to lowest should be:

- Crail Bay (both);
- Forsyth Bay;
- Otanerau Bay;
- Ruakaka; and
- Waihinau.

MFL32 in Crail Bay is different from the other proposed sites for relocation, it has a consent to farm salmon within the same area as consented to Graeme and Liz Clarke to farm other species including mussels. It is currently used as a mussel farm and has been used for salmon.

The current proposal will effectively prevent farming of finfish species within that area; that is grossly unfair on the Clarkes, they currently have the right to apply for other species including salmon, that right will be taken from them through no action of their own, they are innocent participants. I believe the salmon consent should be used as part of the site swap process as one of the first in the priority queue, however I consider it unjust to then make that area subject to prohibition.

RESPONSE TO CONCERNS/OPPONENTS

I was a member on the Marlborough Salmon Working Group. I believe NZ King Salmon took a great leap of faith in agreeing to be part of that group. The outcome from this relocation process will in part determine how successful that Working Group has been. I will make a few brief comments on some specific concerns that have been raised.

Landscape

Landscape was a significant issue for some members of that group, especially regarding the three outer Pelorus sites. The opinions tended to reflect an emotional and unrealistic impression of the outer Sounds. I lived in the Sounds for nine years and even now I don't believe there has been a significant increase in people visiting that area, they are very few when you compare it to the tourist activities operating out of Picton. People would have you believe that tourism has a bright future for the outer Sounds, sorry I don't agree.

Navigation

Navigation has been brought up by several people I have spoken with; however, I take the view that if you are in the outer Sounds and cannot navigate safely you should not be in charge of a vessel, especially that far out. I believe the lighting and other navigational aids would be adequate for properly skilled and experienced navigators. If we worked to the worst skipper's attributes then we would have no marine farming, jetties, moorings or other structures in the sea and boats would be piling up on the various reefs throughout the Sounds. When I was working in the sounds I spent many hours skippering small vessels, so am relatively familiar with the area and what is required from a navigation perspective.

I also don't believe that there will be a significant increase in cruise ships or other large vessels visiting the Sounds. Even if there is, then the multidisciplinary activities able to be viewed in the area, in my view, will be an attraction and not a hindrance, as some would have you believe. Additionally the space available to navigate around the proposed mid channel farm is significant. I have seen videos of large cruise vessels overseas navigating exceptionally narrow and potentially dangerous passages. The proposed mid channel location of a salmon farm in Waitata Reach does not create a narrow and dangerous navigation passage.

NZ King Salmon's Shareholders

Written Comment No: 0519

NZ King Salmon is sometimes accused of being a foreign owned company. In my opinion that comment is sorely misguided, because while the company is part foreign owned, it is also owned by your average kiwi, including iwi. My experience with having a foreign owner has only been positive; they have always backed us for the long term and have stuck with us through the bad times and good.

CONCLUSION

In summary I strongly believe the site relocation process is appropriate. It does include public participation and, if successful, will have major benefits for a range of parties, including NZ King Salmon. Done properly it could provide a well-managed, successful, sustainable industry that contributes significantly to Marlborough and the top of the South Island. It fits perfectly with the Government's Business Growth Agenda, especially given there is no additional surface area being allocated. The proposal is well intentioned, and is positive for the region and New Zealand. It will result in improved outcomes for the environment, the community and the economy.

I wish to speak with the panel.

Mark Gillard

24 March 2017

Written Comment No: 0484

Subject	salmon farm relocation submission Penelope Gluyas
From	Penny Gluyas
To	aquaculture submissions
Sent	Monday, 27 March 2017 4:43 p.m.
Attachments	<<The Minister Of Primary Industries.docx>> <<Pre-Site Selection maps.pdf>>

The Minister of Primary Industries

Submission:

Potential relocation of Salmon farms in the Marlborough Sounds.

Submitted by:

Penelope Gluyas.

My submission is based on the following points

1. Lack of adequate time given to the public to comment on proposed regulations
2. Proposed sites selected are in regions considered marginal for salmon farming
3. Economic impact on Marlborough

1.

- A. The Regulatory Impact Statement provided on the MPI website it states that this is the first time that sub section 360 A-C of the Resource Management Act has been considered, and if it is to be used ***that the following work is required, including, implementation of a consultation process that gives the public and Iwi authorities adequate time and opportunity to comment on the proposed regulations.***
- B. In the report submitted by the Salmon Farm Working Group a recommendation was made that the public were to be given 10 weeks in which to make submissions under the ***Principles of Public Consultation***. This recommendation was ignored and the public were only given 8 weeks to review the documents provided and produce an appropriate submission.

Written Comment No: 0484

- C. This time frame is inappropriate given the fact the this is the first time that this sub section of the Act has been considered for use.

2.

- A. The Boffa Miskall report prepared for King Salmon in March 2012 (attached) indicates the sites selected for proposed relocation fall into regions considered to be marginal for salmon farming. With global trending increases in sea temperatures continuing it is possible that some sites will become too warm for sustainable salmon farming. This is in conflict with **Policy 3** of the **New Zealand Coastal Policy Statement**.

3.

A.

Marlborough's economy relies heavily on revenue from its visitors. According to the Marlborough District Council website the Marlborough region made \$342 million dollars from visitor revenue in 2016. Most of these visitors spent some of their time in the Marlborough sounds.

B.

In the past 5 years in my role as a professional skipper I have had the privilege of escorting over 7000 tourists around the Marlborough Sounds.

Many of these people have been from overseas. Their primary objective in visiting the Sounds was to enjoy the natural surrounding, see marine mammals feeding and socialising and to observe penguins, shags and other seabirds in their natural surroundings. A popular place for seeing dolphins feeding was off Post office Point in the Waitata reach of the Pelorus Sound

C.

A damaging environmental event impacting on the Marlborough Sounds ecosystem would have a long-lasting impact in the numbers of visitors coming to Marlborough and devastating consequences to Marlborough's economy.

Written Comment No: 0484





I wish to present my submission to the hearing

Thank you.

Penelope Gluyas

Written Comment No: 0484

LEGEND

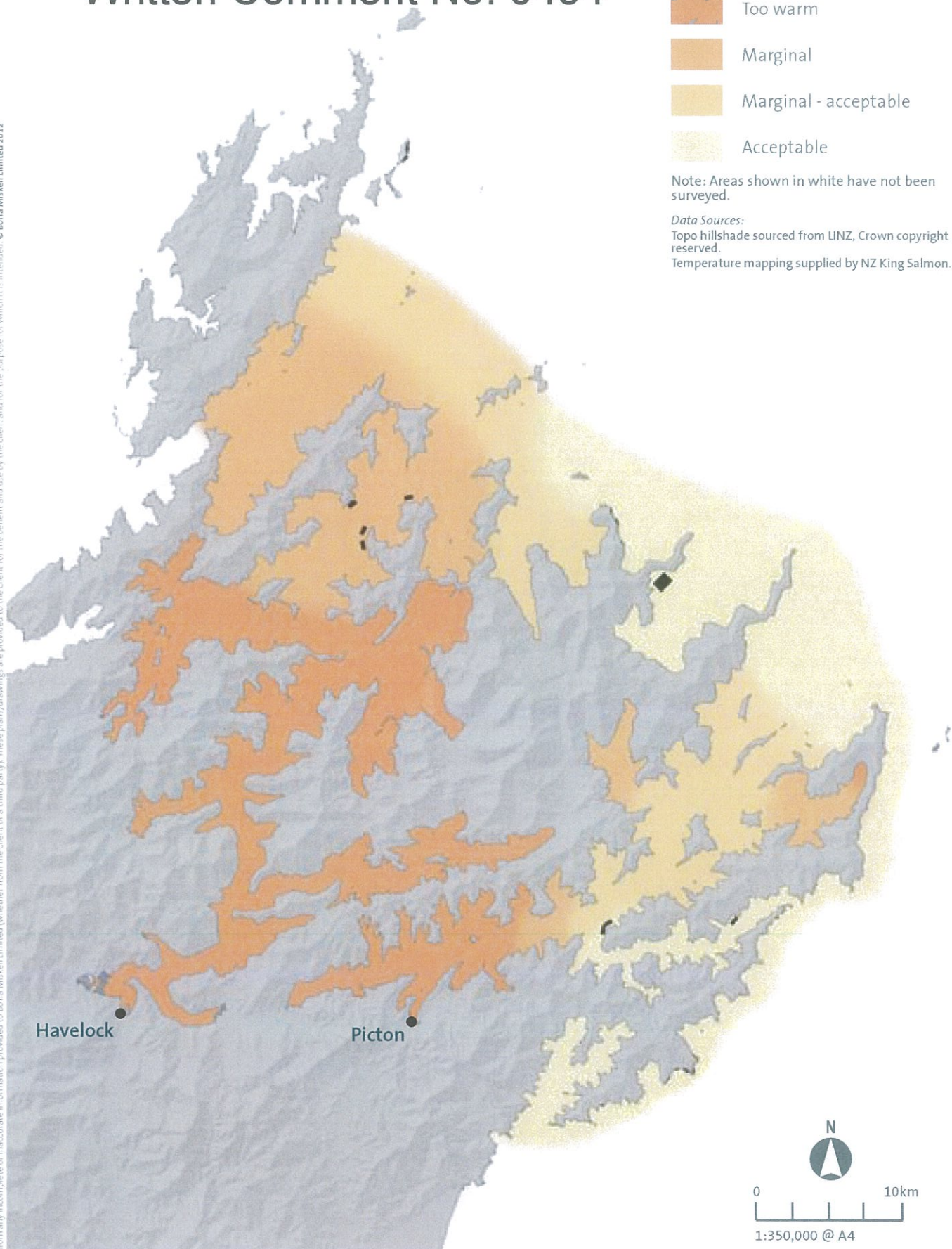
-  Too warm
-  Marginal
-  Marginal - acceptable
-  Acceptable

Note: Areas shown in white have not been surveyed.

Data Sources:

Topo hillshade sourced from LINZ, Crown copyright reserved.

Temperature mapping supplied by NZ King Salmon.



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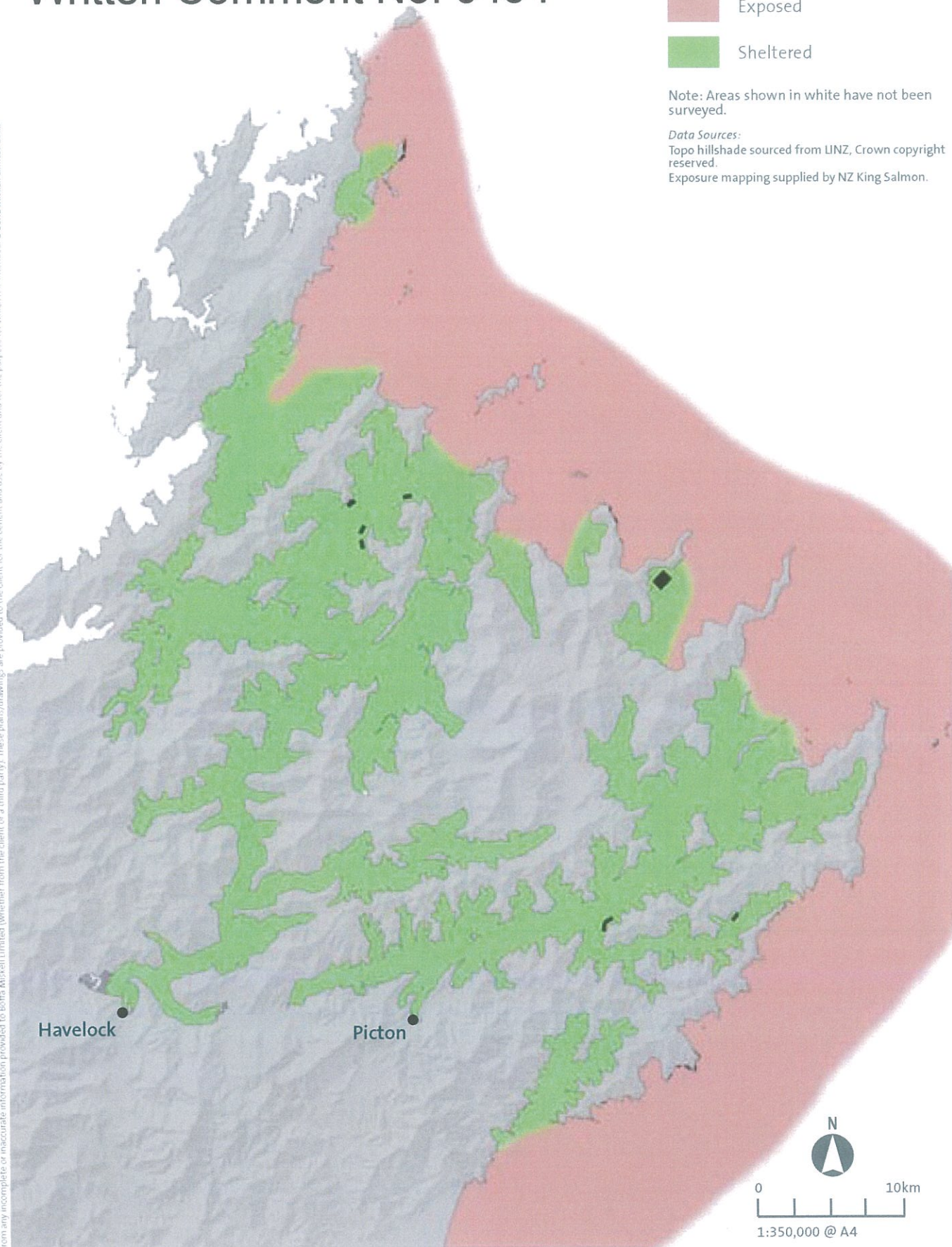
Written Comment No: 0484

LEGEND



Note: Areas shown in white have not been surveyed.

Data Sources:
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Exposure mapping supplied by NZ King Salmon.



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Written Comment No: 0484

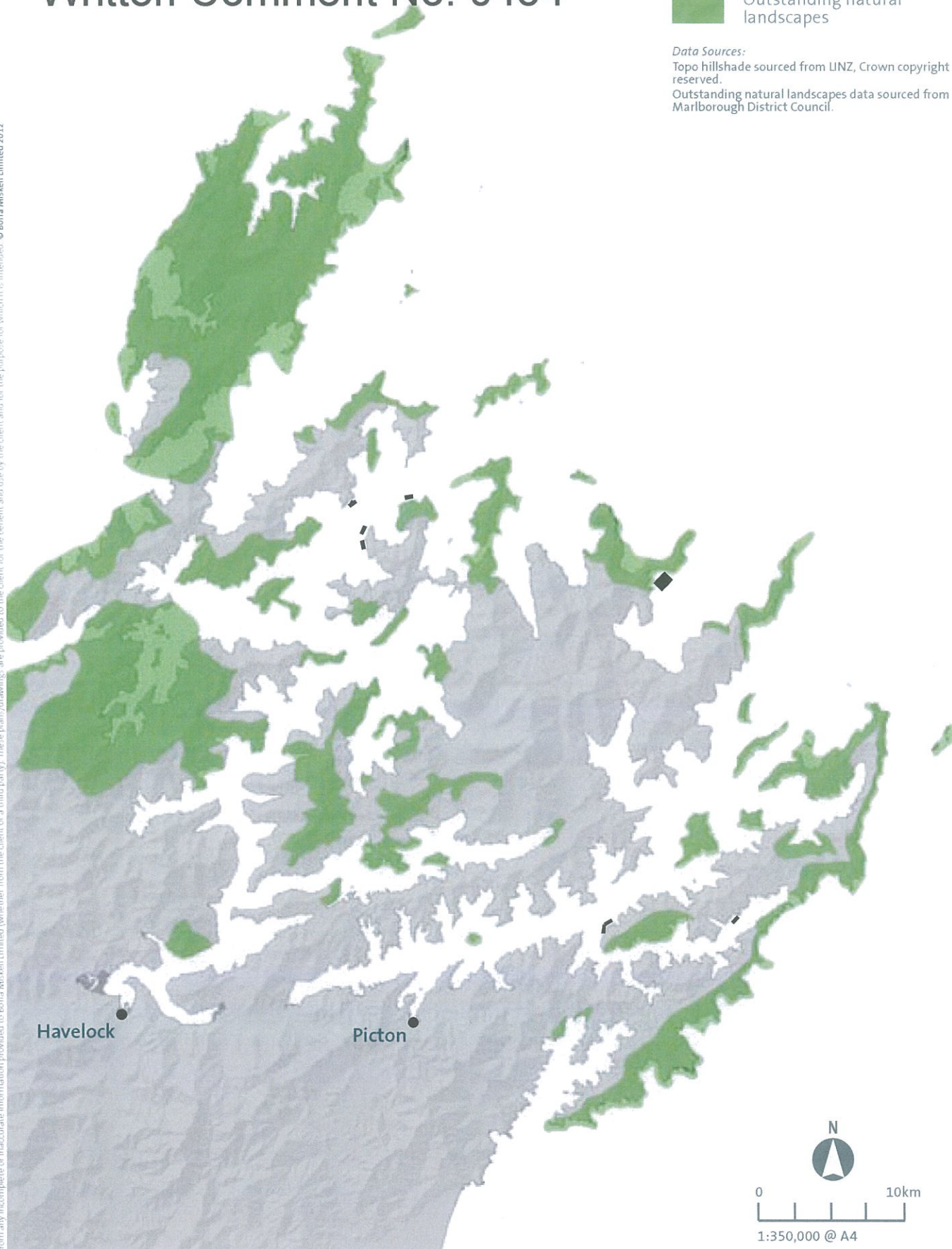
LEGEND

 Outstanding natural landscapes

Data Sources:

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Outstanding natural landscapes data sourced from Marlborough District Council.



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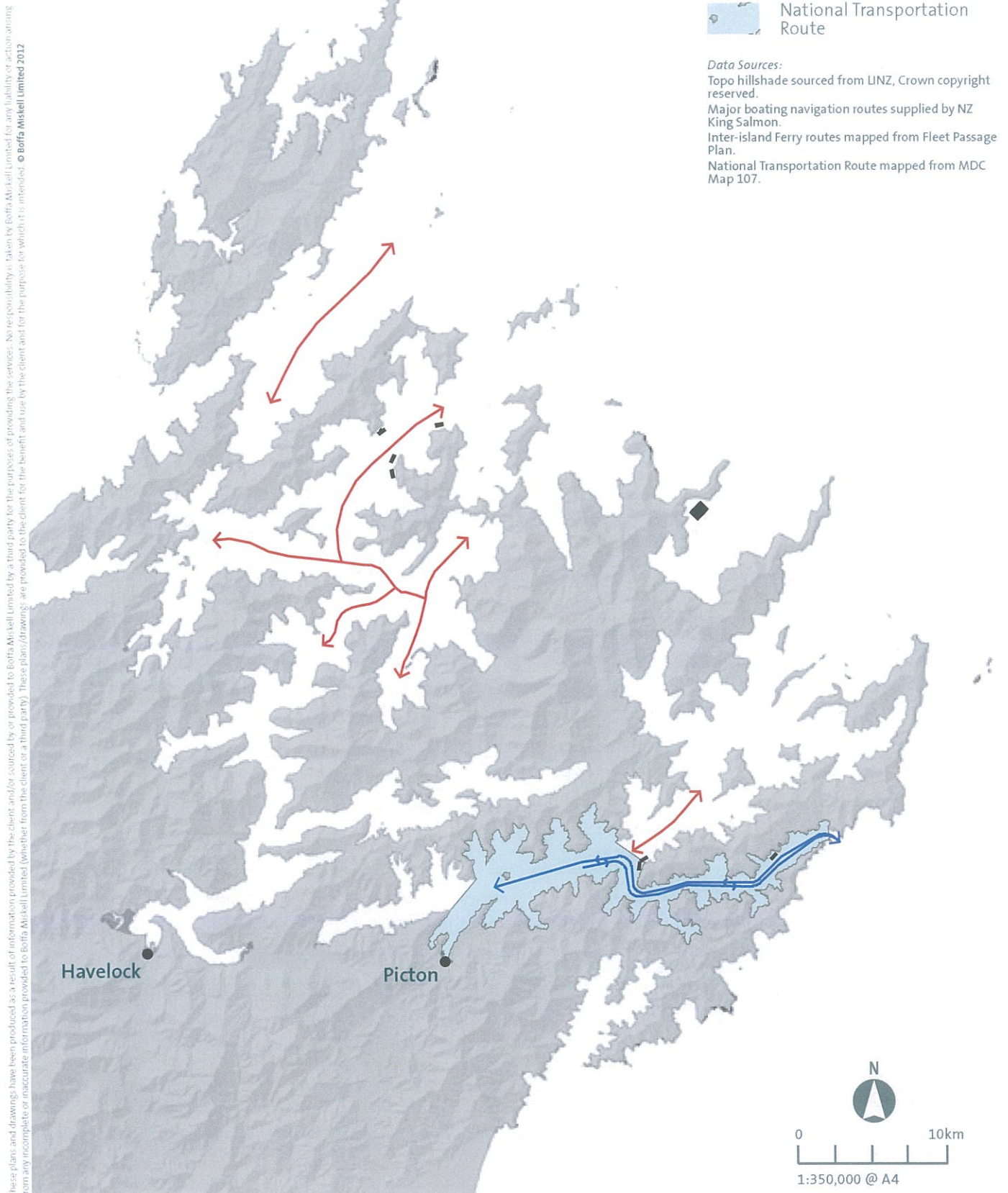
Written Comment No: 0484

LEGEND

-  Major boating navigation routes
-  Inter-island Ferry route
-  National Transportation Route

Data Sources:

Topo hillshade sourced from LINZ, Crown copyright reserved.
 Major boating navigation routes supplied by NZ King Salmon.
 Inter-island Ferry routes mapped from Fleet Passage Plan.
 National Transportation Route mapped from MDC Map 107.



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Written Comment No: 0484

LEGEND



Index of Suitable Location
(ISL)

Data Sources:

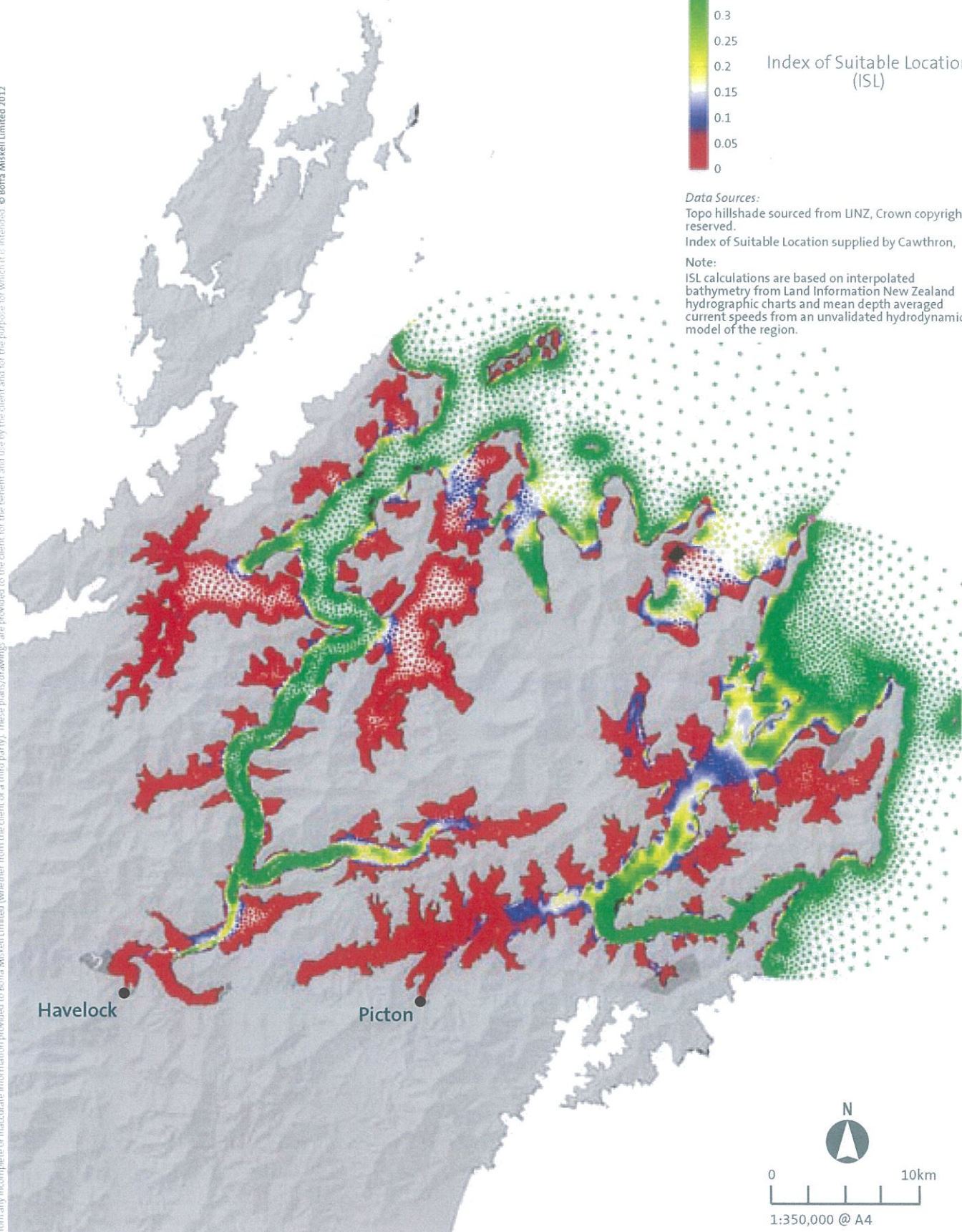
Topo hillshade sourced from LINZ, Crown copyright reserved.

Index of Suitable Location supplied by Cawthron,

Note:

ISL calculations are based on interpolated bathymetry from Land Information New Zealand hydrographic charts and mean depth averaged current speeds from an unvalidated hydrodynamic model of the region.

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Data Sources:

Topo hillshade sourced from LINZ, Crown copyright reserved.

Temperature, exposure mapping and major boating navigation routes supplied by NZ King Salmon.

Outstanding natural landscapes data sourced from Marlborough District Council.

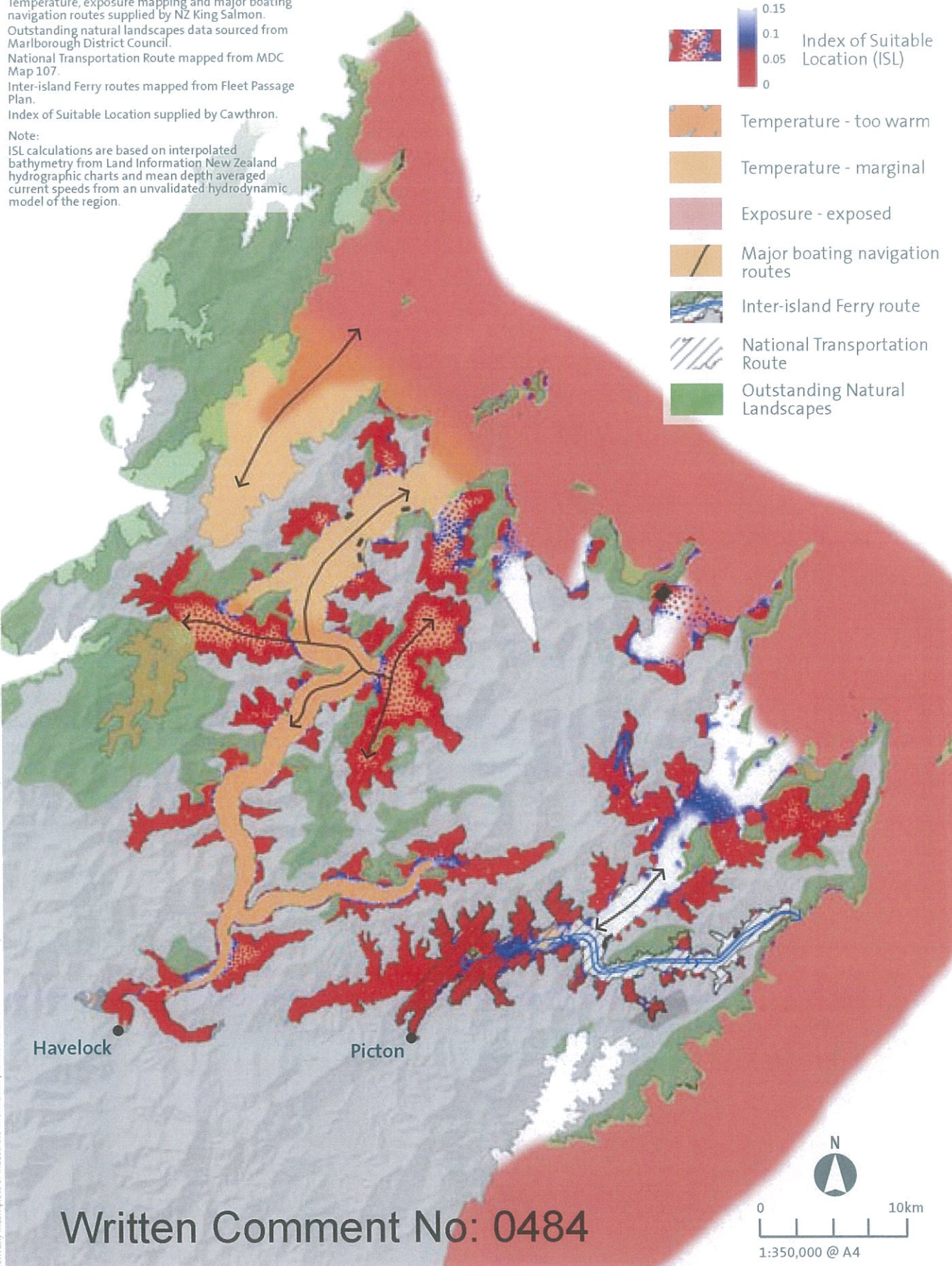
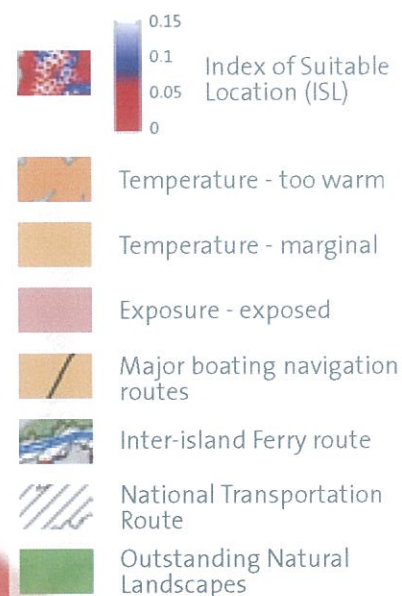
National Transportation Route mapped from MDC Map 107.

Inter-island Ferry routes mapped from Fleet Passage Plan.

Index of Suitable Location supplied by Cawthron.

Note:

ISL calculations are based on interpolated bathymetry from Land Information New Zealand hydrographic charts and mean depth averaged current speeds from an unvalidated hydrodynamic model of the region.

LEGEND

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A busy severe weather outlook!
bit.ly/SWOutlook. Confidence levels are for
rain/wind reaching warning criteria (i.e
100mm in 24h) ^SG



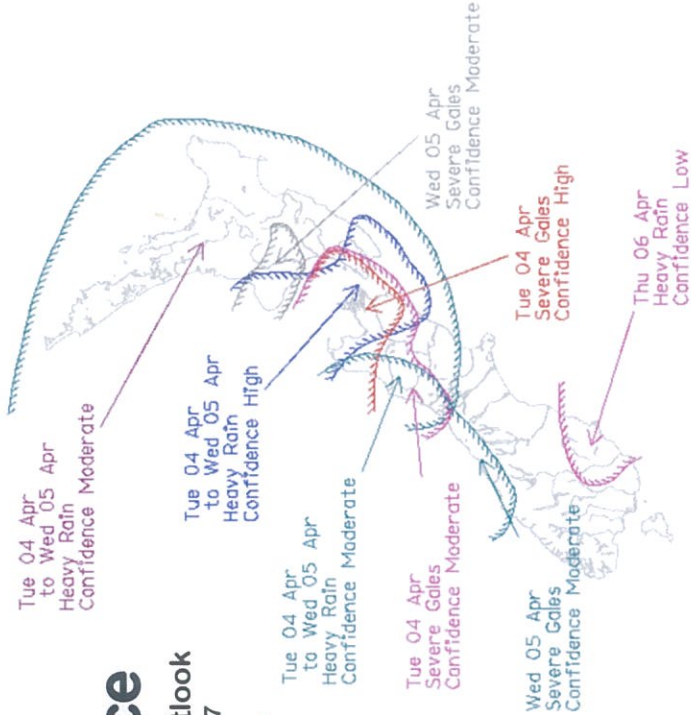
MetService

Severe Weather Outlook

Tuesday 4 April 2017

To

Friday 7 April 2017



Issued on 02-Apr-2017

For more information

www.metservice.com/warnings/severe-weather-outlook

Written Comments No: 0463

Subject	Submission against salmon farming expansion
From	Hanneke & Joop
To	aquaculture submissions
Sent	Sunday, 26 March 2017 11:24 a.m.
Attachments	<<Submission_Godsiff.pdf>>

see attachment

Written Comments No: 0463

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

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 <i>Helen Margaret Godtsff.</i>	
Address <i>R.D. 2 Pictou.</i>	
Email	
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
<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).

Written Comments No: 0463

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.

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:

We need to be looking Towards establishing
marine reserves in The Pelorus Sound
NOT more salmon farms.

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

Written Comments No: 0460

Subject	Submission against salmon farming expansion
From	Hanneke & Joop
To	aquaculture submissions
Sent	Sunday, 26 March 2017 11:24 a.m.
Attachments	<<Submission_Goewey.pdf>>

see attachment

Written Comments No: 0460

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

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	Betty L. Gorwey
Address	[REDACTED]
	AURORA IL 60506
Email	Not Available
Telephone (day)	[REDACTED]
Mobile	None
<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: 0460

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.

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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: As a visitor to this beautiful area I am very much Against this plan. You are all blessed with one of the most Unique Country in the world. Preserve it and you will do the right thing - It has not been necessary before and should be necessary now. Sincerely Betty J. Gormley Huon IT

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

Written Comments No: 0407

Subject	Salmon Farms
From	Gold Ridge Marine Farm LTD
To	aquaculture submissions
Sent	Friday, 24 March 2017 5:01 PM
Attachments	<<Scan0364.pdf>>

Written Comments No: 0407

24 March 2017

Salmon Farm Relocation
Ministry for Primary Industries
Private Bag 14
Port Nelson 7042
<mailto:aquaculture.submissions@mpi.govt.nz>

Submission on Potential Relocation of Salmon Farms in the Marlborough Sounds

Submitter Details

I am Gilbert Douglas James, the Managing Director of Gold Ridge Marine Farms. From 20 hectares of Mussel farms within the Hauraki Gulf, our company creates annually a valuable tonnage of top quality (local market) Mussels supporting in total some 20 local Hauraki jobs.

Our Address for Service is:
Gold Ridge Marine Farms, [REDACTED] Thames.
[REDACTED]

Our Submission

I have a particular interest in the salmon farm relocation proposal because I support provision for sustainable aquaculture development and for approaching this issue in a planned way as has been done rather than in a piecemeal way via a number of consenting processes. I do not seek the opportunity to speak to my written comments at a public hearing.

I fully support the Outcome One for salmon farm relocation, re relocation of all 6 lower-flow sites.

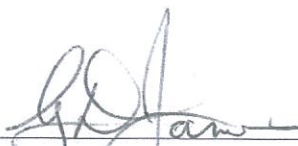
I fully support the process/es by which this is being done, including the Resource Management Act (RMA) s360 processes of regulation and plan changes.

The Outcome One to enable relocation of all 6 lower flow sites will provide;

- a coherent planned approach
- more valuable jobs and economic activity
- more prime delicious, nutritious and valuable NZ farmed seafood
- better managed environmental effects
- better outcomes for NZ in terms of all of; environmental, social and economic outcomes from salmon farming
- Supports and favours sites which better or best fit with the Best Management Practice guidelines for salmon farms in the Marlborough Sounds.

Thank you for the consultation and I welcome any and all queries.

My signature:



Subject	Salmon farm relocation
From	Mark Gillard
To	aquaculture submissions
Cc	Jim Goulding
Sent	Friday, 24 March 2017 12:28 PM
Attachments	<<SKMBT_C25317032410570.pdf>>

Please find attached a copy of a submission on the salmon farm relocation process by Jim Goulding.

Jim can be contacted at [REDACTED]

Regards

Mark

Mark Gillard, Sustainability Manager



[REDACTED] | W: www.kingsalmon.co.nz | A: 93 Beatty Street, Tahunanui, 7011



ORAKINGTM

Written Comment No: 0377

To whom it may concern,

22nd March 2017

RE: Submission on the potential relocation of salmon farms in the Marlborough Sounds

To whom it may concern,

J M Goulding Family Trust & FJ Goulding Family Trust own farm 8207, situated in Horseshoe Bay, Central Pelorus Sound.

The Trusts support the mechanism behind the potential relocation of salmon sites in the Marlborough Sounds

The Trusts support the proposal to make regulations under section 360A of the RMA to amend the Marlborough Sounds Resource Management Plan to enable the relocation of marine farms.


The Trusts support the proposals which provide improved environmental performance for the industry.

The proposed relocation of salmon farm (No 5. Horseshoe Bay in the consultation documents) partially overlaps our site number 8207 in Horseshoe Bay. The Trusts do object to the portion of the area applied overlapping our farm as we have existing property rights under the RMA and is an operating farm. However utilisation of that space may occur subject to an agreement between NZ King Salmon and the Trusts.

I wish to be heard

Regards

Jim Goulding
Trustee



24/3/2017

Written Comments No: 0524

Subject	Fwd: salmon submission
From	Norm Gourdie
To	aquaculture submissions
Sent	Sunday, 26 March 2017 9:06 p.m.
Attachments	<<Salmon Farms submission March 2017.odt>>

Submission by Norm Gourdie



Picton 7281

Ph 

These are my personal views and comments on the above proposal.
Attached is my submission.

This email has been checked for viruses by Avast antivirus software.

<https://www.avast.com/antivirus>

Subject	Re: Automatic reply: salmon submission
From	Norm Gourdie
To	aquaculture submissions
Sent	Sunday, 26 March 2017 9:15 p.m.

Thank you for your confirmation of receipt of my submission. Yes please I would like to speak to my written comments with the panel.

Thanks = Norm.

On Sun, Mar 26, 2017 at 9:07 PM, aquaculture submissions <aquaculture.submissions@mpi.govt.nz> wrote:

Thank-you, your email has been received by aquaculture submissions.

Please note that all written comments received on the proposal will be published on the MPI website at the end of March/early April.

Also, please inform us if you wish to speak to your written comments with the independent hearing panel. Hearings are expected to be running from mid-April to mid-May in Blenheim, and those who have indicated they wish to speak will be advised of the timetable.

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The Ministry for Primary Industries accepts no responsibility for changes made to this email or to any attachments after transmission from the office.

Written Comments No: 0524

SUBMISSION TO THE PANEL FOR POTENTIAL RELOCATION OF SALMON FARMS IN THE MARLBOROUGH SOUNDS

I am Norm Gourdie. I live in the Marlborough Sounds and wish to see this environment cared for, and not despoiled by developments that pollute and create unfavourable effects on this area. I believe that salmon farming is undesirable and detrimental for this area and this proposal is not an honest and open opportunity for the public to have significant influence on the outcome.

I object most strongly to the process adopted by the government in addressing the issue of 'Relocation of salmon farms in the Marlborough Sounds'. Previous Marlborough Sounds salmon farm applications by King Salmon have been investigated and decided on by independent and legal bodies to produce fair, unbiased and honest outcomes.

It appears the government has been hindered, in its primary interest in money and in its pro-development style and direction, by adopting these previous successful, legal processes and has consequently opted to force on the public a biased, unfair process with an outcome of government ruling to achieve the result they want.

The following points illustrate the unfairness of the government's process and its cynical dismissal of public concerns:

- ✘ The blatant power imbalance, where the Minister decides on the outcome.
- ✘ The selection of a government appointed panel to evaluate submissions rather than an independent panel. (Such a panel can unfairly weigh, in favour of King Salmon, the input to the Minister.)
- ✘ No opportunity for cross examination is allowed.
- ✘ Override of the Marlborough District Council and community's, Resource Management Act legal plan for the Sounds by nominating areas for consideration that are presently designated Coastal Marine Zone 1 – no salmon farming.
- ✘ Bypassing the normal Resource Management Act process.
- ✘ Practically ignoring the legal Supreme Court decision in EDS v King Salmon.
- ✘ Information provided to the public selectively omits relevant facts, such as:
 - two of the farms selected for relocation have not been operational for five years.
 - gave no mention of the foreign bacterial diseases (infections that are killing large numbers of the farmed salmon every year).
 - no mention of two new salmon farms starting up this year in Pelorus Sound.
- ✘ Data provided is also selective in assessing algal blooms, nitrogen levels, water column pollution, oxygen depletion.
- ✘ More information and consideration needed to be given to salmon farming expertise in other parts of the world.
- ✘ Tourism, which is growing all the time, needs clean, unpolluted environments, healthy wildlife and scenic landscapes. Yet little weight is given to the effects on tourism and threats to wildlife.
- ✘ Appears to ignore the findings of experts including:
 - Board of Inquiry.
 - Marlborough District Council
 - Environmental Defence Society
 - Dr Ian Henderson, Massey University
 - Resource Management Act
 - The Supreme Court.

Some of the proposed sites would unavoidably create navigational hazards and nuisance for the

Written Comments No: 0524

craft that populate these waters.

Although the information provided by government is comprehensive but selective, and appears to suggest an improvement to environmental effects on the Marlborough Sounds, in reality the current effects of existing salmon farming here are appalling and the public would be far better served by removal of all of the farms.

The new proposal, by providing inadequate, biased information, and a dodgy process for decision making, severely erodes public confidence in achieving any environmentally acceptable salmon farming in the sounds.

This unfair approach, when brought to public attention, will harm this government which puts money and big business ahead of people. At the very least you must redo this proposal in a fair, unbiased process that provides all the information for public scrutiny and move away from your demeaning attitude, in this instance, towards the people of New Zealand. Otherwise I recommend that you decline this proposal and research other options for more environmentally suitable places and operating practices for farming salmon in NZ.

Okay I have been scathing about the process whereby the government appoint their panel, but I hope the panel can look at, with its own personal integrity and unbiased scrutiny, the expert evidence and public submissions to present the government with a fair assessment of the value, or otherwise, of this proposal. Furthermore I request that, with your influence, you convince the government that cross examination should be part of the process.

I would like to attend a hearing and meet with the Marlborough Sounds Relocation Advisory Panel.

Thank you for your attention to my submission.

Norm Gourdie



Marlborough Sounds