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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: 0414

Subject	NZ King Salmon
From	Jeremy Griffiths
To	aquaculture submissions
Sent	Monday, 27 March 2017 11:35 AM

Jeremy griffiths
NZ King Salmon
Territory manager lower south island

I support the potential salmon relocation process being proposed by MPI because I believe the salmon farm relocation will provide for better environmental, social and economic outcomes. I understand that by relocating farms from lower water flow sites to higher water flows sites fish performance will improve and therefore the health of the salmon. It will also have a lower level of effect on the seabed which will have positive environmental benefits. Environmentally adopting the Best Management Practice guidelines that were agreed by the Council and community is the future of aquaculture globally. There will be more direct and indirect jobs created if this proposal goes ahead resulting in economic improvements for the communities in the top of the south. Moving some farms away from baches to more remote locations will improve social amenities which is also a good thing. I would not like the opportunity to be heard by the Advisory Pa

Written Comments No: 0521

Subject	The potential relocation of Salmon Farms
From	vanesa hutcheson
To	aquaculture submissions
Cc	DAVE GRIFFITHS
Sent	Sunday, 26 March 2017 10:25 p.m.
Attachments	<<Potential Relocation of Salmon Farms.pdf>>

To whom it may concern

Please find attached our comments on the proposal.

Regards

Sent from [Outlook](#)

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Proposal: The Potential Relocation of Salmon Farms in the Marlborough Sounds

Submitters Details: **Name:** Vanesa and David Griffiths, [REDACTED]

Phone: Vanesa [REDACTED] David [REDACTED]

Email: [REDACTED]

We wish to specifically comment on the Tio Point, Oyster Bay, Tory Channel proposed site, we do not know enough about the other sites in order to specifically comment.

We oppose the proposal of relocation to this site and we would like to speak to our comments at the hearing in Blenheim.

We have owned a property within Oyster Bay since April 2014. We have a great love of the Marlborough Sounds having spent many recreational hours in, or around the sounds since the late 1990's. Our decision to make a purchase in the Marlborough Sounds was directly related to this love and wanting to secure a place where our kids, families and friends could enjoy the beauty that the sounds offer into the future. We selected the particular property due to the relatively low number of baches in the bay, the amazingly large beach frontage, riparian rights and the vista to the heads of the bay from the beach. We made our purchase after doing what we thought was considerable investigation on aquaculture, or other commercial ventures within and surrounding Oyster Bay at the time. We were aware of several declined applications, and the reasoning for them being declined, and felt that as a result of those decisions at Oyster Bay amenity values would be protected. We knew that the block was run down on purchase and felt that we could take ownership of the block and return in to its native environment. We have worked tirelessly since owning the block to regenerate the native bush by killing over 800 wilding pines on the property, clearing fallen trees, controlling possum numbers, poisoning gorse & controlling pigs and goats. The property has an increasing number of native birds, native trout and eels since our purchase. We are seeing a large number of native seedlings taking off under poisoned pines.

Process

1. We feel under the process that is being taken, which is essentially pushing through the proposal as a matter of urgency, does not really have a valid matter of urgency other than King Salmon being able to maintain economic return whilst others lose out. Allowing King Salmon to avoid the provisions of the district plan in this process is essentially rendering the councils RMA Plan pointless.
2. King Salmon state that they have spent months talking with community groups, iwi and industry groups. Considering there are only four residents in Oyster Bay, why have we not been included on any of these talks? Surely we are considerable stakeholders within the process?
3. Under the process we have not had enough time to digest, comprehend or have any documents and studies peer reviewed and are essentially at the mercy of documents provided and what we have been able to digest and understand in the time given. The cabinet paper suggests that the public and iwi should have enough time and opportunity to comment and I don't feel the time has been sufficient to comprehend all the effects and studies that may affect us.
4. MPI held drop-in sessions that in our view were not well-advertised (having only found out about the Blenheim session two hours before closing), and notification of dates were not up on the internet the day we received formal notification of the site proposal in the post. Although the MPI staff were very helpful in answering our questions and willing to provide

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any information that we required, unless we had read the documents in full and knew what could potentially affect us, it was hard to know what to ask. The staff have been great at answering questions as we have had them, but a presentation with a question and answer session would have been particularly helpful to understand the makeup of the sites earlier.

5. The farm in our view would be odds with The Marlborough Sounds Resource Management Plan Objective 9.2.1(1) The accommodation of appropriate activities in the coastal marine area whilst avoiding, remedying or mitigating the adverse effect of those activities and specifically Policy 1.1 Avoid, remedy and mitigate the adverse effects of use and development of resources in the coastal marine area on amenity values, and aesthetic values, public access to and along the coast and recreational values.

Benthos

1. One of our biggest concerns is that there appears to be no baseline data of the inshore benthos in and around Oyster Bay and particularly our bay and beach. There is no study outside the site area of the water hydrodynamics within Oyster Bay, within our bay, and on particular tides, especially a spring tide with a North West wind.
2. Our property has a North West facing beach and in the time that we have owned the property we have experienced different seasonal changes that we believe are not accounted for, and can only be known from occupational experience. As a North West facing property we are exposed to the prominent North West wind, which shapes our beach and its flotsam and jetsam and the seafloor of the bay.
3. The bay is shallow with a large beach frontage, we have a number of cockle beds, paua on the rocks, schooling kawhai, tarakhi, gurnard and other marine life. We feel the location of the salmon farm will jeopardise this habitat into the future as the currents within the bay will wash waste from the farm onto our beach.
4. The prevailing North West wind brings in a large amount of surface wash (seaweed, pine needles and manmade rubbish) onto our beach, but it also washes up a lot of sediment and sands and changes the beach structure on a continual basis. No document or studies that we have read detailing effects beyond the footprint of the proposal into the bay account for this. We believe these effects should be investigated and be part of any monitoring proposal should the site be approved.
5. Since owning the property we have had at least two to three storms a year where the wind and tides have worked together and sand, stones, seaweed and other rubbish have ended up at least 5-10 metres from the mean high tide mark. We have had large logs, mussel buoys and floats from neighbouring farms end up well up on our beach. See photo below of mussel buoy which is above high tide.

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Photos of our beach from the original owners in the 1970's show a rocky stone laden bay which now has a lot of mud. Anecdotally we have been advised that this occurred after the harvest of the neighbouring forestry from within the bay catchment and we don't want this to happen again.

6. We have continual rubbish washing up on our beach, from dining room chairs, jandals, plastic bottles (we can only assume from the ferry or recreational boats), plastic strapping, rope and items from the neighbouring marine farms. If a collection had been kept in 2.5 years that we have owned the property we feel we could have filled over 16 rubbish bags if not more with the manmade rubbish.
7. We don't want the beach smothered with sludge into the future and no one held accountable. Although the site is high flow allowing more movement of the sediment away from the farm, it doesn't appear king salmon intend to change any practises. The new site in Tory Channel is too young to understand the effects in a high flow situation on the benthos and it is not located at the head of a shallow north west facing bay.
8. If there is a prevailing North West wind we are likely to be swamped with the noise, smell and sediment flow.

Water Quality

1. We have not seen any water quality analysis or study that has been done within the bay, all works are in or around the immediate site. How can the water quality be understood until the bigger picture, the whole bay, is looked at in its entirety? Also as the Ngamahau site is in its infancy how can anyone correctly predict the cumulative effect of all the farms in one location on the water quality and benthos. How is the effect to be monitored and who will be accountable should it change? The likelihood of Algal blooms if they are all in one area?
2. Oyster Bay is affected by north westerly weather patterns which forces material into a shallow embayment. Oyster Bay is not like the main stem of Tory Channel as it has less current flow and effects on water quality and clarity are retained over longer time frames than the rapid changes and dilution that occurs in the main channel.
3. The coast near the site is shallow because sediment has been trapped in this location by the Tory Channel current. Although the site has high flow and the modelling predicts the waste matter will go mainly towards Tory Channel, from our personal experience of the bay and the winds and currents and all the points above we are struggling to understand how this conclusion can be drawn with such a limited study of the inner bay and its behaviour.

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4. What will happen if the location of the farm changes the hydrodynamics of the bay? Who will be accountable? What will be the penalty?
5. Why is there a need to retain the already consented mussel farm consent adjacent to the proposed salmon farm that they are not using? We were advised that this consent was being surrendered at the MPI drop in, but this appears not to be the case. If it's not surrendered the cumulative effect is even greater on our amenity values.

Noise and Odour

1. Noise is also of a large concern to us. Currently we are able to hear the Clay Point farm generator on still nights and in certain weather conditions and feel the proposed sites generator and feeders will intrude on our quiet enjoyment of "our place", and as it is being placed directly in the entrance to the bay in close proximity to our property, we will hear the farm on a much more consistent basis than we hear Clay Point. We assume there will be workers on the site and their noise and movements will also be heard from our place. Of particular concern is the noise that would also be generated from net cleaning and at harvest time and when these harvests will occur. What noise the feed barge will bring and how often the feed barge will visit the site.
2. There is no indication of the vessel or barge movements associated with the site or hours of operation. We consider all will have some impact on the amenity of our property.
3. Inevitably with the location of the farm the smells attributed will end up heading our way on the predominate North West wind and sitting on our beach would become unpleasant. The noise and social report completed appears to not include our property and we are directly open to the farm with no land mass to soften the sounds or redirect the smells.

Lights, Predators and Wildlife

1. Lights used during the months of April to October at Clay Point can be seen directly from our beach and the cumulative effect of the lights on the new site and Clay Point together will be significant and will light up the bay like a Christmas tree or industrial park and will hinder our visual amenity and the natural amenity.
2. The lights will also increase the number of predatory animals that will visit the bay and cause great concern for the swimming and water sports that our children, us and visitors do within the bay.
3. We have already spotted sharks in our bay on a number of occasions and whilst not enough to fear, we feel the introduction of the farm and in King Salmons admission the introduction of more seals, the predator numbers will increase within the bay. This is of a big concern as we enjoy the safety that they bay provides at present for recreational activities.
4. Locally we have a large number of birds nesting in the trees on the north eastern side of the bay and fear that bringing in the salmon farm these nests will increase around the bay and possibly move further towards our property. At certain times of the year we have large amounts of krill wash up onto our beach and this naturally attracts a large number of sea birds, therefore we can only predict if there is a continual food supply they may begin to nest.

Social, Recreation and Navigation

1. Our property was attractive to us because of the shallow bay and big beach providing a safe recreational environment for our children. They love swimming, water skiing, paddle boarding and biscuiting around the bay, as well as finding crabs, shellfish and exploring the environs,

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we feel this will be adversely affected with the introduction of this farm. Increased presence of predators and dubious effects on the benthos and water quality impacts will destroy the very values and reason we purchased the property.

2. When we purchased the property we investigated the potential effects of aquaculture and were encouraged by the fact that further aquaculture sites were limited as some sites had been declined it would seem on amenity grounds.
3. Navigationally the site is placed right in the main path we and all residents currently use to enter and exit the bay. Very little space will be available for safe navigation into and out of the bay, especially if the current mussel farm consent is not surrendered as part of the process and is developed. Being local Marlborough residents we often boat in and out of the bay on daylight or dusk especially during the winter months and feel it will pose undue navigational risk, not only to us but to the visiting boats that come into our bay. There will be very little water space to the north eastern side of the farm and therefore we are going to be required to reduce speed to a no wake zone just to get past the farm and into our property.
4. Nearly every weekend that we are in residence in the summer we would see at least 2-4 boats stop at the entrance to the bay to fish well known tarakihi and blue cod holes. These will be covered by the new farm site. On numerous occasions the recreational boats will also move further into the bay to fish as well. The reef is also popular with us and divers and is in jeopardy of damage.
5. On numerous occasions we have had people tie up on our moorings or alight on our jetty. The bay is a well-known and visited recreational area.
6. Our place is used on a regular basis. We have numerous friends that visit over the year. Our visitors come to enjoy the fishing, diving and general natural beauty of our bay. The salmon farm will be a significant feature within the bay and although we are aware that the Clay Point farm is in existence the land form behind it masks the structure within our view. The new site however, due to its placement within the middle of the entrance to the bay with no land form behind it, will be a dominant feature as can be seen from the photo below. It is clear the visual and navigational impact will be significant.

Landscape

1. The landscape report completed by Hudson only looks at the farm from one view point in Tory Channel and does not take into consideration the view point from our place. This is our current view from our beach and the farm will be smack bang in the middle of the very reason we purchased the property.



2. The property was planted in the 1980's with shrubs and trees within the 20 metre zone to provide some shelter from winds and therefore when we are at the bay the beach becomes the prominent place where we spend our time. The landscape report talks about the limited amount of time that both farms will be viewed together. Our continual view should the farm proceed will be of both the proposed site and Clay Point non-stop. Our visual amenity values will be destroyed, industrialised and the natural beauty of the place irreversibly taken. MPI and King Salmon have advised that the site will be a single storey barge in recessive colours and black netting, but no amount of cover up can dress up the fact that the farm will be smack bang in our view 365 days of the year. It will diminish the natural environment and the cumulative effect of both farms together along with the existing mussel farms within the bay will give the area a dominant industrial focus. The effect on our amenity values will be extensive and diminish what is left of the natural environment.

One of our favourite past times is sitting on our beach at sunset with family and friends watching the sun descend and the location of this new farm site is going to significantly impede on that beauty. It will be a dominant feature on the landscape that we can't escape, as it is visible from the entire beach and property.

3. Although we are not opposed to marine farming and can see the economic benefits we feel that the location of this farm has potential to destroy what the Marlborough Sounds are about. The high concentration of salmon farms within the area will have a negative effect on amenity values and will destroy the natural beauty which tourists come to see. Tory Channel is the gateway to the south for tourists on the ferries and the cumulative effect of so many farms in one location will destroy that natural beauty of the sounds.

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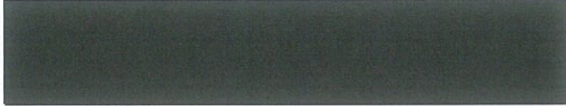
4. A high level of maintenance will need to occur to maintain the farm visually and structurally in the high flow zone.

King Salmon is set to make most considerable economic gains, however surrounding land owners and recreational Marlborough sounds users will endure a financial, emotional and personal loss. If King Salmon was going through the RMA, financial benefit or loss would not be considered of either party. So why now is it used as a huge reasoning point to push the process through as a matter of urgency?

For all of the reasons above we oppose the proposal to relocate the salmon farm to Tio Point, Oyster Bay.

Relocation of Salmon Farms in the Marlborough Sounds

Thawng Khan Thang Gualnam



I think the farms should be moved to fast water sites because the fish will be healthy and the water will be cleaner. It will be better for our environment, not so many houses at these new sites and the farms won't spoil the views.

Moving the farms will let us grow more fish and will have more jobs for everyone.

Maug.
21/02/2017

Relocating Salmon farms in the Marlborough Sounds.

I have been in NZ for 11 years and working at NZKS for 9 months. I like my job and I would like to see our farms moved to faster water. It will be better for our salmon. We would have better quality fish and grow more salmon without ruining our sea floor. We will have cleaner water in the sounds. More fish means more jobs.

Kap Maung Gualnam



A handwritten signature in blue ink, appearing to be 'mg' or similar initials.

21.02.17.

Written Comments No: 0465

Subject	Guardians of the Sounds submission
From	Bill Foster
To	aquaculture submissions
Sent	Sunday, 26 March 2017 12:04 p.m.
Attachments	<<Potential-Relocation-of-Salmon-Farms-in-the-Marlborough-Sounds-Feedback-form-Word-version (2).docx>>

Hello there,

Could you please confirm that our attached submission has been received.

Regards,

Bill Foster

Vice-Chairman, Guardians of the Sounds

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

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

Guardians of the Sounds Incorporated

Clare Pinder; Treasurer, and William Foster; Vice-Chairman

Representing the view of the Guardians of the Sounds

Clare Pinder

[REDACTED] Blenheim [REDACTED]

William Foster

[REDACTED] Picton, [REDACTED]

Comments can be:

- emailed to aquaculture.submissions@mpi.govt.nz
- posted to
Salmon Farm Relocation
Ministry for Primary Industries
Private Bag 14
Port Nelson 7042

Consultation questions

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

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

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

- the title of the consultation document
- your name and title

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

Written comments are official information

Please note that your written comments are official information. Written comments may be subject of requests for information under the Official Information Act 1982. The Official Information Act specifies that information is to be made available to requestors unless there are sufficient grounds for withholding it, as set out in the Official Information Act.

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

Public hearings

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

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

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

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. This is not relocating farms, it is setting up six new farms. The Board of Inquiry (BOI) also stated that the environmental and landscape threshold had been reached at Waitata Reach in Pelorus Sound with the two new consented farms. Now King Salmon (KS) want FIVE more in that same area. There was 10 000 tonnes of feed granted for Waitata Reach for 2 new farms and 4,000 tonnes of feed for Tory Channel. This was to be done through adaptive management so that as feed levels increased the environmental impacts would be monitored. One monitoring report is finished for Tory Channel but none for Waitata Reach Pelorus Sound. The BOI wanted to have staged feed levels only increasing if monitoring showed that this was sustainable. This is contained in the BOI documentation. Paragraph 438 of the BOI talks about the environmental effects information presented by KS as being deficient. Also the monitoring required by the BOI only covers the detritus under the pen (benthic degradation) and not what gets spread in the water column, which is obviously much greater and potentially more damaging in high flow sites. High flow sites distribute the detritus further than just under the pens; whilst this helps reduce a problem for KS and MPI, it obviously can only increase the pressures on the flora and fauna in the sub littoral zone.

Question 2:

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

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 sustainably operate these sites, along with their other high-flow sites, to comply with the Benthic Guidelines at maximum feed levels for at least three years before any more space is considered. [consistent with BOI Condition of Consent 44a]. This especially applies to Tio Point, which would be the fourth salmon farm in close proximity in Tory Channel. In the meantime reduce the feed and stocking rates at the low flow sites to meet the Benthic Guidelines. GOS therefore consider that none of the sites are currently suitable and that the existing consented forms should be monitored using adaptive management before any further farms are considered or consented.

Question 3:

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

The heavily polluted low flow sites should be decommissioned, or stocked at a level where they can meet International best practice guidelines.

Question 4:

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

There has been no serious consideration for finfish farming on land or in open water. KS says that the technology isn't available for another ten years (by which time they will have polluted their new 3 consented sites plus six new sites to the point that they are unusable and will have caused untold damage to the flora and fauna of the sub littoral zone). The NZKS Supreme Court decision ruled there was an obligation to consider alternatives under the NZ Coastal Policy Statement and Section 32 of the RMA. **"Particularly where the applicant for a plan change is seeking exclusive use of a public resource for private gain."** [SC 172-173]. Having salmon farms offshore (open ocean aquaculture) rather than in the confines of the Marlborough Sounds would dilute the pollution and remove the conflict with other users. This approach is being used in countries such as Norway and Sweden has the technology to farm fish on land. Offshore alternatives are barely mentioned in this proposal. As mentioned, NZKS claims it would be achievable in 10 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. Rather than pushing this relocation proposal for areas prohibited to aquaculture, GOS and others believe **MPI and the industry should invest in research to expedite offshore farming as a future-proofed alternative.**

Furthermore, as the Environmental Defence Society (EDS) has rightly stated, Marlborough District Council is currently reviewing its plans and that is the proper place for decisions about aquaculture to be made. The issue should be subject to independent, strategic assessment and Environment Court scrutiny, not an *ad hoc* Ministerial decision that lacks planning integrity and has a narrow focus. It invites people to make written submissions, which will be considered by a panel appointed by government. There is no provision for cross-examination of experts and so the hearing lacks robustness. GOS agree with EDS that this process is a very questionable one, but even Ministerial decisions are still subject to the rule of law.

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. It also disregards the 2013 BOI and 2014 Supreme Court decisions about expansion of salmon farming into prohibited areas of the Marlborough Sounds. If successful, this would potentially set a precedent for the Minister to make similar water-grabs around New Zealand, usurping the power of local authorities and wishes of local communities;

something that should not be occurring in a democratic first world country surely?

Question 5:

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

There are huge environmental costs. Paragraph 379 of the Board on Enquiry document (BOI) discusses feed levels and the extrapolation of 400,000 people defecating in the sea. The city of Christchurch has 375,000 people. The calculations were done by Rob Schuckard (Sustain our Sounds), KS did them for the BOI itself so reliable and the figures can be backed up. There are three new consented farms from the BOI process, and if KS gets six more, it will be approximately the same amount of discharge into the water column that there would have been for the nine farms KS originally asked for during the BOI. The feed levels for the six new farms is (~25,000 tonnes) and we believe that combined with the three consented BOI farms (14,000 tonnes) the feed levels are approximately the same (39,000 tonnes) as what was proposed at the BOI (43,000 tonnes). Please note that we have subtracted the feed levels from the low flow sites KS wish to abandon from the figures.

However you look at it, it is a lot of nitrogen and phosphorous going into the water. Scientific expert for Sustain our Sounds during the BOI (Rob Schuckard) has calculated that the amount of nitrogen from the existing and the six new farms is equivalent to all the other nitrogen sources in the Sounds (land run off, upwelling from Cook Strait, rivers, mussel extraction, denitrification etc.) KS is asking for an additional 24,600 tonnes of feed for the six new farms. This takes the amount of pollution up to the 400,000 figure of people defecating in the sea. 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.

Don't be confused; of course human faeces is different in composition to what comes out of a fish, but they all contain nitrogen and phosphorous, which is the crux of the current contentious issue (amongst others) in the 'dirty' NZ dairy Industry. 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.

Question 6:

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

As EDS point out, there's very little weight being attached to landscape impacts and acknowledgement of the earlier Supreme Court decision in *EDS v King Salmon Ltd*. That decision is binding law and at least 3 of the 6 sites proposed should not even have got this far.

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?

GOS believe that most New Zealanders see the Marlborough Sounds as iconic and in need of statutory protection as an MPA and that any further degradation of this beautiful public water space and habitats (which KS hasn't paid anything for the last 30 years) would be a travesty and disgrace before this can occur. Yes, there are moves afoot for the Marlborough District Council to introduce water charges for all users but the amount per salmon farm is still only in the region of \$2,000 (proposed).

These new farms are in areas that are Outstanding Natural Landscapes (ONL's) or areas in the coastal marine zone that prohibits further aquaculture.

Question 8:

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

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?

Rumours are already in circulation that the low flow sites will be used by KS to grow smolt, or be given to Iwi to set up mussel farms. Given KS's highly litigious nature, GOS expect KS will be back in court to overturn its promise to abandon these sites.

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?

Question 11:

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

A staged adaptive management approach needs to be fully implemented at the three sites consented by the SC before any new sites are consented anywhere in the Sounds.

Question 12:

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

These regulations have been created for the sole benefit of King Salmon and MPI. There is nothing democratic about this process. GOS cannot agree to the wording.

Question 13:

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

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?

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?

MPI needs to understand that the Community has a process within the RMA to challenge any proposal for any reason. MPI should not support Corporate Welfare at the expense of the community or its own reputation.

MFE and Statistics state in 2016 publication "Our Marine Environment" More than a quarter of our native marine mammals are threatened with extinction. The greatest risks they face are from fishing impacts, marine pollution, and changes to food sources and habitats.

And further from MFE; Aquaculture is an expanding industry, and there is limited information about how aquaculture affects the marine environment. Operations are concentrated in particular areas (mainly around the top of the North and South islands), and the potential impacts from aquaculture are also likely to be concentrated in those environments. Shellfish farms contain a high density of animals that filter the water to feed, and this can reduce the amount of phytoplankton (the base of the marine food chain) available for other species. Aquaculture operations can also increase nutrient enrichment of the surrounding seabed, which affects nearby habitats. They can deposit live animals, shells, and faeces (from shellfish farms), or uneaten food and faeces (from finfish farms), which can smother seabed species and habitats. Marine mammals and seabirds can also be displaced by aquaculture, and some species become entangled in the fish-farm structures. In addition, aquaculture may increase the risk of pests and diseases spreading or becoming established (Ministry for Primary Industries, 2013).

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?

The environmental bottom line referred to in the Supreme Court (SC) decision was about Outstanding Natural Landscapes (ONL's). If an area is designated as an ONL the SC said

that developments in the coastal marine area needed to be avoided. The SC ruling did not apply to water quality. (source Gary Taylor EDS). However, some of the new sites are in areas designated as ONL's, so are therefore unsuitable for salmon farming. This proposal will degrade the Outstanding Natural Landscapes and High Natural Character values of the Waitata Reach. The BOI decision identified the threshold number of salmon farms for Waitata Reach as TWO – Waitata and Richmond – and turned down three others because of the cumulative effects on Landscape, Natural Character, King shag feeding and Tangata Whenua values(BOI 1252). NZKS and MPI have ignored this ruling, which was arrived at after a long and considered judicial process. Instead they have joined forces and put forward this relocation proposal for FIVE more farms in the Waitata Reach. None of these proposed farms can therefore be justified.

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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?

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?

These ugly man-made structures are not appropriate in the iconic Marlborough Sounds. KS's promise to build a more aesthetically pleasing barge for Ngamahau Bay was quickly re-litigated through Council hearings and an old barge was put in place. Even if there are promises and conditions, KS will litigate to have them changed. 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.

Question 19:

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

There is not enough known at the existing high flow sites or the newly consented sites. Best practice only takes into account the benthic pollution. Not what is spread in the water column. High flow sites spread the pollution further. There needs to be scientific studies of the effect from the existing consented sites before any expansion takes place.

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?

YES. Don't put them there in the first place.

Question 21:

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

There needs to be scientific evidence that native fish, Paua, birds, kelp and other flora and fauna is not being degraded by the existing consented farms before any new farms are given the go ahead. If MPI provided similar funding toward understanding the community concerns and also gave the community funding to provide truly independent expert advice then the community would have an opinion.

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?

Tio Point is a well-known area for blue cod, paua, and massive kelp beds. Humpback whales and orca have been seen in the area as it is a rich food source. Comprehensive flora and fauna studies should be undertaken and be mandatory in any CMZ1 zone or any other zone that is proposed to be used for fin fish farming.

Question 23:

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

Increasing nitrogen pollution to the equivalent of all other sources of nitrogen in the Sounds, if the six new farms go ahead, is a disaster in the making. These proposed new farms are in close proximity to each other, or in the case of Tory channel close to existing farms. So this huge amount of nitrogen, equivalent to 400,000 people will be distributed in a small area. How can this not have a detrimental impact on the seabed, water column and flora and fauna?

Question 24:

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

These are not potential sites, this is common water and should not be exploited for short term profit and long term harm in this manner.

No sites should be located in the water ways but if anywhere, onshore where all costs rest with the operator, not the ratepayer or environment. Any waste from farms must be contained and removed by the operator.

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Question 25:

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

Question 26:

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

Question 27:

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

The BOI stated that Waitata reach had reached the maximum environmental threshold with the addition of two new farms, and that those farms should be monitored using adaptive management before increasing feed amounts. No monitoring reports have been undertaken at these sites and no work has been done on the effect of these two new sites on the King Shag population.

Question 28:

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

Policy 11 of the NZ Coastal Policy Statement calls for protection of indigenous species in the coastal environment. The NZ King Shag is classified as nationally endangered and is found only in the Marlborough Sounds. King Shag are sensitive to disturbance when breeding, roosting and feeding. Duffers Reef to the Waitata Reach, where five new farms are proposed, are key areas for these activities. The threat to King Shag was a factor in the BOI restricting the number of new farms in the Waitata Reach to two in its 2013 decision [BOI 1252]. Yet this latest proposal is seeking another five farms in the King Shag foraging area.

Question 29:

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

Orca families are frequent visitors to Tory Channel. Hump back whales transit Tory Channel. Seals are attracted to the Salmon farms and can get trapped inside. This is potentially harmful for the seals. There has not been enough research done on the effect on dolphins or other marine mammals. Studies should be provided and be mandatory in any CMZ1 zone.

Question 30:

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

All the sites proposed pose a risk to marine mammals.

Question 31:

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

Yes, paid for by the operator; King Salmon and independently peer reviewed. This should be mandatory in a CMZ1. There seems to be very little independence in any monitoring and reporting to date. Expert witnesses paid for by KS during the BOI are present again during this process. An OIA request will ascertain whether KS is paying for their experts to advise the Ministry. Or whether the taxpayer is paying KS's experts to advise the Ministry.

Salmon must be tested by an independent laboratory as is the case overseas, to determine fish health and disease identification.

Any identified diseases should invoke testing on native fisheries to determine what the crossover effects might be,

Question 32:

Written Comments No: 0465

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

There is no question that this is battery farming in the sea. These intelligent, sentient salmon have no choice but to swim round in tight circles, get fed every 30 seconds and when night time comes the grow lights come on and they are fed all night as well. Should they not be afforded the same rights as pigs in sow crates and battery hens which are being banned?

Question 33:

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

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?

GOS finds it somewhat surprising that siting five farms in a busy navigational zone wouldn't raise some very large red flags that these sites are located in an area that is not conducive to safe navigation.

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?

Tourism is the number one major earner of export dollars globally and is increasing in Marlborough and the Sounds. Rather than spending hundreds of thousands of dollars to prop up a foreign owned company with a poor track record of animal husbandry (fish mortalities and habitat loss in its home country), surely it would make more economic and

environmental sense for the NZ Government to invest in promoting eco-tourism and sustainable marine management in the Sounds? (This could be achieved through a Marine Park, similar to the Great Barrier Reef and not a Recreational Fishing reserve, which would deliver no positive benefits to communities, industry or the environment) There is a lack of scientific evidence on the effect of other marine life in the vicinity of the existing and newly consented salmon farms. It must be proven that the existing farms are sustainable before any new farms are consented.

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?

This is surely an oxymoron. You cannot remedy or mitigate the presence of an Industrial operation in a seascape, right on the tourist route of the Ferries containing hundreds of thousands of passengers; many of them International visitors, other than by not placing them there in the first place or ultimately to remove them all to the open sea or on land. Furthermore, the most recent OCED report on NZ states that we are lagging behind other countries and the pressure that industrialised primary industry is putting on our natural resources is risking our overseas "clean green" image.

Question 37:

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

MPI should be fully aware of the history in Tory Channel of the Maori, early settlers and the Whaling industry of the 18th and 19th century. There is a very rich history concentrated in this part of Tory Channel.

Question 38:

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

Question 39:

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

This has already been argued at the Board of Inquiry. These lights are alien to the night time seascape and are detrimental to the natural feeding and behaviour of all indigenous fish.

These lights can only be assumed to be a nuisance to night feeding fish and for the night time navigation of pelagic fish. GOS request a scientific study be undertaken to understand and describe the effects and mitigation of effects on indigenous fisheries and should be mandatory in any CMZ 1

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?

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

Demersal Fish.

No mention in this extensive questionnaire has there been of demersal fish; bottom feeders such as cod, gurnard and perch. Blue cod are the iconic fish of the Marlborough Sounds and they are already under fisheries management as a result of commercial and recreational over fishing.

Locally Tio Point is known for its excellent Cod and Gurnard fishing when conditions are right. Blue cod have been caught with salmon feed in there stomach, clearly indicating a range close to salmon feed lots.

Salmon feed pellets are designed for fast growth of farmed fish. Studies into the effects on indigenous fish around existing farms is therefore critical to identify the wellbeing of native fisheries. GOS believe that any further introduction of relocated farms will be detrimental to the blue cod, especially in Tory Channel.

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GOS request Independent Scientific study on the effects on Blue cod, perch and other demersal fish; their number, size, habitat and effects on them (and for this to be ongoing monitored) and this be presented prior to any decision made on relocating farms.

Shell Fish.

Again no mention of the effects on shell fish, blue mussels and all the other flora and fauna in the benthic zone. GOS request Scientific studies of the sea floor and within the shadow of the proposed farms to determine numbers and health of this zone (and for this to be ongoing monitored) & presented prior to any decision made on relocating farms.

Paua

The Paua is a food source and a recreational endeavour for many and an iconic inhabitant of the intertidal zone. These animals are sensitive to water conditions and require a supply of healthy and plentiful kelp. Paua have vanished from all bays where farms are established. Case in point is Ngamahau, Tory Channel. Prior to the farm paua of all sizes were in abundance; now there are none along the coastline of Ngamahau Bay. Tio Point (entrance to Oyster Bay) has abundant and healthy paua and a large kelp forest. This area has been determined to be an excellent habit for spawning and juvenile development as well as harvest size paua. GOS request Scientific studies of the intertidal zone paua population, quantities, health and reproduction (and for this to be ongoing monitored) and this must be presented prior to any decision made on relocating farms.

Kelp forests.

What potential effect from the farm relocation and effects shadow could there be on kelp forests and other sea weed? GOS request that Independent Scientific studies are undertaken and presented prior to any decision being made on farm relocation, and for this also to be ongoing and independently monitored.

Amenity

There has been no benefit to the local community in Tory Channel from the presence of the salmon farms.

New Zealand King Salmon are not a good neighbour. They add no value to property and devalue property that they become neighbours with.

Their presence is nothing more than intrusive and detrimental in so many ways, furthermore they are arrogant in their dealing with the local community.

In conclusion, GOS believes there should be no discussion of more or moving salmon farms in the Marlborough Sounds until NZ King Salmon shows it can operate the ones it has sustainably and within the agreed benthic guidelines.

Written Comments No: 0309

Subject	Salmon relocation submission.
From	Paul Gurr
To	aquaculture submissions
Sent	Thursday, 23 March 2017 12:50 PM
Attachments	<<Paul Gurr MPI Submission 2017.docx>>

Please find attached my submission for the proposed relocation of salmon farms in the Marlborough sounds.

Cheers

Paul Gurr,
Contracts & Improvements Manager



M: [REDACTED] | W: www.kingsalmon.co.nz | A: 10-18 Bullen Street, Tahunanui, 7011



ŌRA KING™

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Written Comments No: 0309

Salmon Farm Relocation

Ministry for Primary Industries

Private Bag 14

Port Nelson

aquaculture.submissions@mpi.govt.nz

To: The Salmon Relocation Advisory Panel

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

The relocation of the salmon farms from lower water flow sites to higher water flows sits will provide all stakeholders an improved outcome including healthier larger fish and from an environmental perspective healthier sea-beds.

To enable the world's population to feed itself it is vital that we look more to sustainable industries such as aquaculture to fill the gap in production shortages. The MPI proposal in conjunction with adopting the Best Management Practice guidelines that were agreed by the Council and community provides a blueprint for what is the future of aquaculture globally.

By moving to high flow sites I believe that more fish will be able to be grown on the same footprint in the sounds, this will ultimately create more employment both directly and through ancillary service industries whilst relocating farms to less densely populated areas of the sounds will reduce the visual impact on sounds residents.

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

Regards

Paul Gurr

Contracts and Improvements Manager

New Zealand King Salmon

Nelson, New Zealand.

Subject	Potential Relocation of Salmon Farms in the Marlborough Sounds
From	Simon Gutschlag
To	aquaculture submissions
Sent	Sunday, 26 March 2017 7:59 p.m.

Hi There,

My name is Simon Gutschlag, my phone number is [REDACTED] my address is [REDACTED]
[REDACTED] Nelson, and my e-mail address is [REDACTED]

I am an employee of New Zealand King Salmon and am in strong support of the proposal to relocate the proposed 6 sites as described in the background documents. I believe that farmed salmon is far better for the entire environment than land-based farming and should be encouraged. To that end, I believe that the 6 proposed relocation sites are a minimum sensible number, and given the extremely low impact on the environment and the small footprint required - more could be allowed in the future.

I know the background of the science and environmental impacts of low-flow sites v high flow sites and know that the entire Marlborough Sounds region would be better served from an environmental perspective, if the farm relocation's proceed as discussed in the "Potential Relocation of Salmon Farms in the Marlborough Sounds" document/proposal. I'm also convinced that although New Zealand King Salmon is considered one of the best practice salmon farming organisations in the world, overall fish health would be improved if higher flow sites were available in place of the current low flow sites.

I'm also fully behind the numbers of potential economic benefits to the region and aware of the potential moving forward for the top of the South Island area.

I am unable to present to the committee considering the proposal in April.

Thanks and regards

Simon Gutschlag

Subject	Submissions RE: salmon farm relocation
From	Kristin Spaetzel
To	aquaculture submissions
Sent	Tuesday, 28 February 2017 4:20 p.m.
Attachments	<<C.Wells.pdf>> <<D.Ray.pdf>> <<K.Boaz.pdf>> <<K.Duff.pdf>> <<K.Spaetzel.pdf>> <<M.Leary.pdf>> <<M.Wells.pdf>> <<N.Wells.pdf>> <<S.Guy.pdf>> <<S.Wells.pdf>>

Hi,

I am writing as I have collated a number of submissions from people I know and their friends and family. Each letter is the same, however each individual has signed and dated their own copy to show their support for the idea. I felt this was the easiest way to register the support of a large number of people who are in favor of the idea of moving the sea farms but who would be unlikely to take the time to compose their own personal letter. Hopefully this will even things out as I realize people in favor are less likely to put in a submission than those who are against. Each individual has read and stated that they agree fully with the written statement. If you wish to contact any individual or obtain contact information please don't hesitate to ask.

Thank you for your time.

Regards,

Kristin Spaetzel

BSch. Marine and Freshwater Biology

Written Comment No: 0139

To Whom It May Concern:

I wish to add my support to the proposal made to relocate certain sea farms. I believe it will be beneficial to the fish being raised, the surrounding environment, the local community, and the economy.

Regards,

Sereen Gay



23/02/17

Relocation of salmon farms in the Marlborough sounds.

I support the move of the farms to high flow sites because it is better for the environment in the sounds. Better quality salmon and the ability to increase numbers of salmon which will provide more jobs. This provides me with job security and the knowledge that jobs will be there for future generations.

Sheryl Guyton



S. Guyton

27.2.17