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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: 0478

Subject	Marlborough Salmon Relocation
From	Daniel Manson
To	aquaculture submissions
Sent	Monday, 27 March 2017 4:44 p.m.
Attachments	<<Marlborough Salmon Relocation.docx>>

Please note attached submission.
Regards,

Daniel Manson *Primary & Valued Added Factory Manager*



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



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Written Comments No: 0478

Marlborough Salmon Relocation

27th March 2017

To The Minister Of Primary Industries,

I am writing to confirm my support with the potential relocation of the six salmon farms to the potential new sites {Named Below} owned and operated by The New Zealand King Salmon Company.

Salmon farms to be considered for relocation;

Tōtaranui/Queen Charlotte Sound:

- Ruakaka Bay
- Otanerau

Te Hoiere/Pelorus Sound:

- Forsyth Bay
- Waihinau Bay
- Crail Bay (2 farms). The Crail Bay sites have not been stocked since 2011.

Potential salmon farm relocation sites;

Te Hoiere/Pelorus Sound:

- Blowhole Point North
- Blowhole Point South
- Waitata Mid-Channel
- Horseshoe Bay
- Richmond Bay South

Kura Te Au/Tory Channel:

- Tio Point

I strongly believe the substantiated benefits of doing so greatly improve the company's environmental position and addresses the concerns of dwelling owners within some of the current farmed locations. Additional benefits include but not limited to,

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- Increased employment opportunities within New Zealand King Salmon therefore a significant and positive benefit.
- Job creation for businesses providing a service to New Zealand King Salmon.
- Highlighting the importance of addressing environmental and social factors.
- Growing markets and introducing a world class product with many health benefits to more people around the globe.
- More efficient and productive use of water space benefiting all people.
- Job security.
- Tomorrow's people entering the workforce.

Our company lead by Mr Grant Rosewarne and backed by an extremely solid and professional board has a proven track record with having best practise forefront of mind with all facets of business including Best Aquaculture practise, operating in the most sustainable manner possible, humane animal welfare and an extremely ethical and pro-active approach to social responsibility.

A successful outcome of relocating the salmon farms can be viewed as nothing but beneficial in my view and such an outcome will provide financial and environmental reward to a huge number of families, business owners and suppliers.

A relocation would also reflect well on New Zealand as a country continuing to demonstrate how a corporate works in a cohesive way with government and governance.

Yours sincerely,

Daniel Manson

Primary & Value Added Processing Manager

The New Zealand King Salmon Company

Subject	MPI Salmon Farm Relocation submission
From	
To	aquaculture submissions
Sent	Monday, 13 March 2017 9:03 a.m.
Attachments	<<2014-03-13 MPI Submission - Karen Mant.pdf>>

My submission - attached

Karen Mant, *Environmental Project Manager*



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



ŌRA KING™

Written Comment No: 0187

12 March 2017

Ministry for Primary Industries

Aquaculture.submissions@mpi.govt.nz

Dear Advisory Panel

My name is Karen Mant, Environmental Project Manager for NZ King Salmon, and I am writing in support of the Marlborough salmon relocation project.

I have been employed by NZ King Salmon and its predecessors since 1990. My role at this time was receptionist / junior administration assistant. Our office was based in Nelson city and the team consisted of a General Manager, Export Sales Manager, Domestic Sales Manager, Management Accountant, Financial Accountant, Accounts Clerk and me! That was the team back then in 1990.

At this time we had three separate entities; Southern Ocean Salmon (SOS - Te Waikoropupū Springs salmon farm), Marlborough Salmon Company (MSL - Hallum Cove / Waihinu Bay & Forsyth Salmon farms), and Pacific Salmon Processors (PSP - Bullen Street, Tahunanui factory). Each company was a separate entity with individual financial accounts, who bought and sold to and from each other. The two salmon farms in the Pelorus were serviced each day by staff ex Elaine Bay. The three companies merged soon after I started in 1990 and traded as Southern Ocean Seafoods (SOSF).

In the next few years (early 1990's) we bought the neighbouring Skeggs factory in Bullen Street to allow for increased production and it also had room for corporate offices and the small office team in Nelson city moved to Bullen Street. During the salmon 'off season' (winter) part of the factory was contracted to shuck scallops. We could do everything in the one factory back then, scallops, gilling & gutting salmon and packing smoked salmon. I remember a floor to ceiling curtain that separated the areas in the one factory. Food safety requirements were stepped up and the stand-alone Ready to Eat (RTE) processing factory / smokehouse was built off Merton Place and the scallop shucking was no longer.

As the business grew the small corporate team also grew, and there were many benefits having everyone in the same location – sales teams and production manager's co-ordinating supply and demand and the company had established year round supply – a first of its kind in New Zealand. Over the next few years the corporate team grew out of the offices in a factory, and we leased an office building on the opposite side of the road in Bullen Street.

In 1996 when Regal Salmon Company (RSL) which had salmon farms at Ruakaka, Otanerau, Te Pangu and head office in Picton, was purchased by SOSF. The company began trading as The New Zealand King Salmon Co. Limited (NZKS). We merged retaining many RSL office staff as well as the team in Picton which included the net making and engineering services.

In 2012 we were overflowing in Bullen Street and expanded our corporate offices to Beatty Street nearby to accommodate the growing teams that we are today.

My roles over the past 26 years have been varied. I started fresh out of Nelson Polytechnic into a junior admin role, and have progressed to payroll, accounts payable & receivable, credit controller, IT projects, IT helpdesk before I started my family in 2004. I came back to NZKS in the Finance department before taking a role in the Sustainable Management Team. My role in this department has grown considerably over the past 5 years, with the EPA process, increased science and

technology in the aquaculture field, international certifications. In my 26 years, I have been through three mergers and worked under three CEO's:

- David Nelson – General Manager Southern Ocean Seafoods
- Paul Steere – CEO NZ King Salmon (current Board Member)
- Grant Rosewarne – current CEO.

There are probably not many companies of this size that has had such a low turnover at CEO level.

For the past 3 years I studied through the Open Polytechnic and completed a Diploma in Environmental Management. The company fully supported and paid for my diploma which I am truly grateful for. While studying my diploma I completed a paper on Global Sustainability.

The world is facing a growing food crisis with the prediction of global population likely to be nine billion by 2050. Demand for animal proteins will be twice the amount of what we are capable of producing today. (Riddet Institute, 2010)

Global seafood production has been struggling to keep up with increasing consumption and a rising interest in finfish farming and aquaculture has been identified as a way to close the gap between supply and demand by supplementing the harvest of capture fish populations. Figure 1 shows the steady growth of global aquaculture over recent decades compared to capture production with future predictions of aquaculture overtaking wild fish catches. (The State of World Fisheries and Aquaculture 2014, 2014)

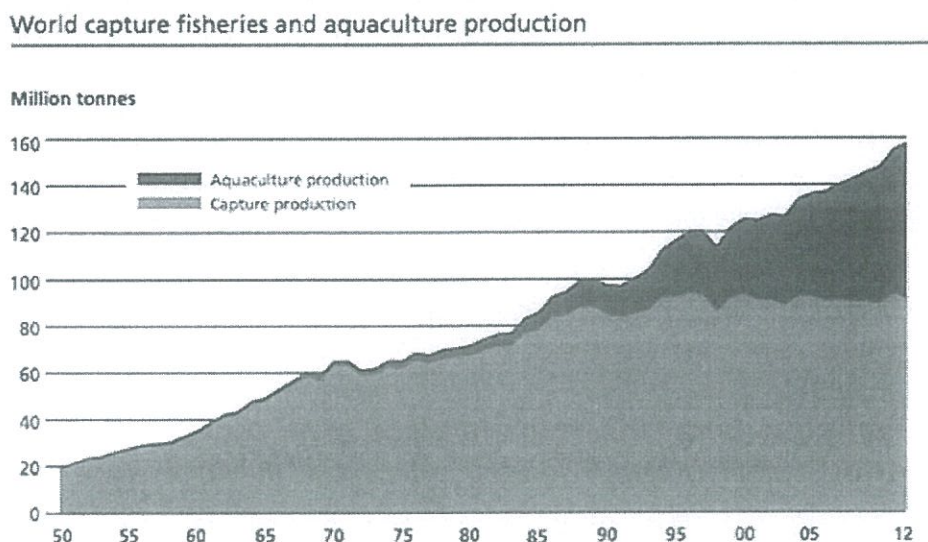


Figure 1 – World capture fisheries and aquaculture production. (Unsustainable Fishing, 2012)

The global production of aquaculture has significantly increased over recent decades and many people believe that such growth has relieved pressure on the ocean fisheries.

My role also incorporated certification, and in the past four years NZKS has been accredited with the internationally recognised BAP (Best Aquaculture Practice) certification, with all seafarms and processing facilities being independently audited. In 2016 we added our three hatcheries (Waikoropupū Springs, Tentburn and Waiau) to the BAP certification, and thus NZKS was the first company in Australasia to be awarded BAP certification to this standard.

Written Comment No: 0187

We are proud to have an active and focused sponsorship and community support programme. We support various community organisations, charities and events, with financial and product sponsorship. Geographically our sponsorship focus is on the Marlborough region, followed by the greater top of the South and our freshwater locations. I believe that salmon farms in the Marlborough Sounds are as much of the community as the baches. Our staff often come to the aid of recreational fishers / boaties for assistance. Recently our divers were asked to untangle a rope wrapped around the prop of a boat, we assisted in the rescue of a small plane that crashed in Ketu Bay and saved the pilot from drowning and barges have a defibrillators on board available for anyone to use. Many recreational fishers / boaties are very interested in the salmon farms.

Therefore I support this relocation project in many ways:

- Science. Having the science to position a salmon farm in the most suitable area rather than in areas that were easy to obtain, converted mussel farms, or seemed to be a good place at the time. This can only create a positive environmental outcome for a sustainable future.
- Social amenity. Many of us enjoy the Marlborough sounds for recreational use and the amount of residential baches is growing as bays become more accessible by road and boat. Moving the salmon farms out of these bays will provide better social outcomes for many residents – especially Bulwer near the Waihinu Bay farm.
- Economics. The growth over my time in this company has been huge and I'm very proud to be a founding member of the Company.

Malaysian ownership. I just want mention my opinion of Tiong family and its ownership. The Tiong family has had part ownership of NZKS and its predecessors ever since I can remember. They have stood by this company through thick and thin. At times when things weren't looking so bright back in the late 1990's of GDAS, the Tiong family came to our aid to ensure the survival and continued employment. The Tiong family love fishing, and all they ever wanted was to go to the salmon farms and catch a fish on a rod. As for the criticism they receive for taking profits offshore – I can ensure you in the past this has been quite the opposite. I fully support their ownership and am very grateful for it.

It is exciting times for King Salmon, and I would definitely like the opportunity to be heard by the advisory panel.



Karen Mant



Written Comments No: 0258

Subject	MPI Salmon Relocation Submission
From	[REDACTED]
To	aquaculture submissions
Sent	Friday, 17 March 2017 4:08 p.m.
Attachments	<<Craig Mant Submission.pdf>>

Written Comments No: 0258

Salmon Farm Relocation

Ministry for Primary Industries

Private Bag 14

Port Nelson

aquaculture.submissions@mpi.govt.nz

To: The Salmon Relocation Advisory Panel

My Name is Craig Mant and I fully 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.

As a descendent of Jacky Guard who in 1827 was whaling in the Tory Channel and fought with Te Rauparaha - fishing has always been in our family. I when I left school I went commercially fishing for my Grandfather Allan Guard.

I am also involved in the forestry industry and have been involved with logging in the Marlborough Sounds, and am fully aware of the environmental challenges that this industry faces.

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

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

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

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

I am also a keen hunter and recreational fisher and for many years I have been hunting , fishing and diving in the Marlborough Sounds most of my life. This is a very special place, and I believe that moving the salmon farms away from coastlines would provide more opportunities for diving and fishing. I am very familiar with the Pelorus Sound and believe that mid channel site is the future for salmon farming, away from coastlines.

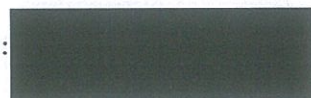
I would not like to be heard by the hearings panel.

Name: Craig Andrew Mant



Email:

Date: 12 March 2017



Written Comment No: 0505

Subject	Fwd:
From	Marine Aquaculture Contracting
To	aquaculture submissions
Sent	Monday, 27 March 2017 4:39 p.m.
Attachments	<<MAC Submission.docx>>

----- Forwarded message -----

From: "Marine Aquaculture Contracting" [REDACTED]
Date: 27 Mar 2017 3:42 PM
Subject: Fwd:
To: "aquaculture.submission@moi.govt.nz" <aquaculture.submission@moi.govt.nz>
Cc:

----- Forwarded message -----

From: Waitata Farm [REDACTED]
Date: Mon, 27 Mar 2017 at 3:41 PM
Subject:
To: Marine Aquaculture Contracting [REDACTED]

Written Comment No: 0505

Salmon Farm Relocation

Ministry for Primary Industries

Private Bag 14

Port Nelson

aquaculture.submissions@mpi.govt.nz

To: The Salmon Relocation Advisory Panel

Paul Luxton and Cole Warwick – Marine and Aquaculture Contracting LTD - Picton

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

Having lived and worked in the Queen Charlotte Sound it would be good to see less of a commercial presence over that side and better use of less populated, higher flow sites in the Pelorous Sound.

As Contractors for the New Zealand King Salmon company we whole heartedly support the expansion if its done so in an environmentally responsible fashion.

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

Written Comments No: 0290

Subject	Salmon Farm Relocation March 2017
From	Debbie Stone
To	aquaculture submissions
Sent	Wednesday, 22 March 2017 3:46 PM
Attachments	<<Salmon Farm Relocation March 2017.pdf>>

Good Afternoon,

Please find attached the MFA's submission to the Salmon Farm Relocation Proposal

If you require any further information, please do not hesitate to contact me

Regards

Debbie Stone

Finance & Administration Manager



 Blenheim



www.marinefarming.co.nz



22nd March 2017

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

To whom it may concern,

The Marine Farming Association (MFA) is a subscription based organisation representing marine farmers in the top of the South Island of New Zealand. The MFA has 129 ordinary members who own, lease or sublease Greenshell mussel, oyster and King Salmon farms in the upper South Island. Marine farmers in the MFA's growing area grow 80% of the marine products farmed in New Zealand.

Sales from those farms exceed \$270 million per year. Marine Farms in Marlborough contribute around 5.7% of Marlborough's GDP (from farming and processing). The industry accounts for approximately 250 FTEs in farming and approximately 600 FTEs in processing in Marlborough.

The MFA was set up with the objective to promote, foster, advance, encourage, aid and develop the rights and interests of its members and the marine farming industry in general. The MFA works alongside other industry bodies to see the New Zealand Aquaculture sector recognised within New Zealand and around the world as producing healthy, high quality, environmentally sustainable aquaculture products.

The MFA supports the mechanism behind the potential relocation of salmon sites in the Marlborough Sounds

The MFA supports 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 MFA supports proposals which provide improved environmental performance for the industry.

MFA wishes to be heard

Regards

A handwritten signature in blue ink, appearing to read 'Jonathan Large', with a long horizontal flourish extending to the right.

Jonathan Large
MFA President

Subject	Marlborough Aquaculture Limited
From	Ang Woolf
To	aquaculture submissions
Sent	Monday, 27 March 2017 4:24 p.m.
Attachments	<<SUPstairs C17032716400.pdf>>

We act for Marlborough Aquaculture Limited.

We attach our clients Submission to the proposed Salmon Farm relocation.

Regards
David Clark



Wisheart Macnab & Partners
Barristers & Solicitors

[Redacted] Blenheim 7240 | New Zealand

| E: [Redacted]

www.wisheartmacnab.co.nz

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Wisheart Macnab & Partners
Barristers & Solicitors

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27 March 2017

Salmon Farm Relocation
Ministry for Primary Industries
Private Bag 14
Port Nelson 7042

Email: aquaculture.submissions@mpi.govt.nz

Re: **Submission on Proposed Relocation**

We act for Marlborough Aquaculture Limited and set out below our clients Submission in relation to the proposal.

1. Marlborough Aquaculture is not opposed to either salmon farming or salmon farming relocation in general terms.
2. Marlborough Aquaculture is both the existing marine farmer in Blow Hole Point south and has an application for an extension to that marine farm which has yet to be determined by the Marlborough District Council.
3. Accordingly the proposed salmon farm relocation is in an area where Marlborough Aquaculture has applied for mussel farming.
4. Therefore it is Marlborough Aquaculture's submission that if NZ King Salmon wish to proceed with relocation to Blow Hole Point south that the relocation area be moved further seaward to be outside a line between Blow Hole Point and Te Akaroa (West Entry) Point and what is Coastal Marine Zone 1 in the Marlborough Sounds Resource Management Plan. That way the location of the NZ King Salmon site will be in a similar position to that which is proposed for the site at Blow Hole Point north and will not overlap with the Marlborough Aquaculture site.
5. Marlborough Aquaculture is keen to emphasise that any changes to the Marlborough Sounds Resource Management Plan (or the Marlborough Environment Plan as the case may be), while they may enable salmon farming, there is no reason why salmon farming should be enabled to the exclusion of mussel farming. The reason for this last submission is that it is not the function of the planning documentation (or the Resource Management Act for that matter) to regulate or control one form of marine farming as against another. In the absence of any environmental feature which would preclude one form of marine farming over another at any particular site then there should be no such provision in the planning documentation so that if there is further water space made available there is no priority or exclusion in favour of salmon farming as against mussel farming.

Partners – D J Clark LLB J C Leggett LLB C J Murdoch LLB BA

Associate – R J Zydenbos (Registered Legal Executive - Fellow)

Registered Legal Executive – A M Woolf

Yours faithfully

WISHEART MACNAB & PARTNERS



.....
DJ/Clark



Encl

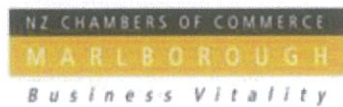
n:\wmp\djcl\et\marlbaqua-submission-mpi.doc

Subject	Submission
From	Stephen Gullery
To	aquaculture submissions
Sent	Monday, 27 March 2017 9:00 a.m.
Attachments	<<Submission Salmon.pdf>>

Please find attached our submission.
Thank you

Regards

Stephen Gullery
Chief Executive



Marlborough Chamber of Commerce

Blenheim 7240

P: [REDACTED]

M. [REDACTED]

E: [REDACTED]

W: www.mcoc.org.nz

**The Marlborough Chamber of Commerce looks forward to 2017
and seeing you at some of our events.**

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Written Comments No: 0458

Submission to the Ministry for Primary Industries
From the Marlborough Chamber of Commerce
Stephen Gullery, Chief Executive

Subject:

Salmon Farm relocation in the Marlborough Sounds

Purpose

- to ensure the environmental outcomes from salmon farming are improved through implementation of benthic best management practice;
- to potentially improve the social and cultural outcomes from salmon farming by creating jobs, & moving salmon farms away from areas of high competing use;
- to maintain or increase the economic benefits from salmon farming.

Submission

Upon review of the Ministry for Primary Industries documentation concerning the potential relocation of salmon farms in the Marlborough Sounds, we wish to register our support.

Reasoning

The Marlborough Chamber of Commerce supports the concept of improving the environment we live in and conduct business in while still maintaining or improving the commercial viability of the area.

This proposal appears to reduce the impact of salmon farming on the low flow areas of the Marlborough Sounds, with their relocation to higher-flow areas. A positive action to ensure the longevity of the waterways.

The protection of the seafloor and the reduction of the effects on water quality meets our desire to see sustainable aquaculture in our region.

We also support the improvements in the understanding that the commerce of the venture will increase and as such be a positive to the local economy. It indicates that it will also increase the level of employment in this area of Marlborough.

We are aware of the concerns of locals to the look these farms have on the area. We understand the proposed new locations are more remote, away from current bach communities, which must be considered a positive, both in maintaining the appearance of the area, but also the safety, as the waterways are often the Sounds highway.

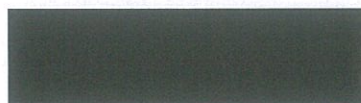
I would not like to be heard by the hearings panel.

Name: Stephen Gullery

Email:

Date: 22nd March 2017

Phone:



Written Comment No: 0391

Subject	RE: Salmon Relocation Proposal
From	Pere Hawes-5143
To	aquaculture submissions
Sent	Monday, 27 March 2017 5:11 PM

The MDC would like to be hear in support of its submission, thank you.

From: aquaculture submissions [<mailto:aquaculture.submissions@mpi.govt.nz>]

Sent: Monday, 27 March 2017 4:59 p.m.

To: Pere Hawes-5143

Subject: Automatic reply: Salmon Relocation Proposal

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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Salmon Farm Relocation Proposal - MDC Submission

The following is the Marlborough District Council's submission to the MPI consultation document "Potential relocation of salmon farms in the Marlborough Sounds".

The Marlborough District Council

The Marlborough District Council is a Unitary Authority. As a Unitary Authority, the Council has the functions and powers of both a regional council and a territorial authority. This means it must prepare all of the mandatory planning documents under the RMA, including a regional coastal plan.

There is an operative statutory planning framework for Marlborough. This consists of the Marlborough RPS and two resource management plans.

The Marlborough RPS was made operative on 28 August 1995. When the Council commenced the process of developing a regional policy statement, it took into account the RMA's focus on integrated management of natural and physical resources and the Council's role as a unitary authority. As a direct result, the Council chose, at that point in time, to combine the regional coastal plan, regional plan matters and the district plan into integrated resource management plans. The Council has two such integrated plans, each one covering a distinct geographic area: The Marlborough Sounds Resource Management Plan (MSRMP) covering the Marlborough Sounds; and the Wairau/Awatere Resource Management Plan, which applies to South Marlborough.

The purpose of regional coastal plans is to achieve the sustainable management of natural and physical resources in the coastal environment. In the Marlborough Sounds the operative regional coastal plan is embedded within the provisions of the MSRMP.

Current provisions of the MSRMP

The proposal is to amend the operative provisions of the MSRMP to enable the relocation of up to six existing salmon farms by regulations made under section 360A of the RMA 1991. The Minister must have regard to the provisions of the regional coastal plan that will be affected by the proposed regulations before recommending regulations be made. For this reason, the Council has set out the provisions in this submission.

The MSRMP was notified on 31 July 1995. In terms of structure, it contains issues, objectives, policies and methods to achieve the integrated management of natural and physical resources. These provisions are included in Volume 1 of the MSRMP. Each chapter of Volume 1 covers a resource type, resource use activity or value.

Chapter 9 of Volume 1 covers the coastal marine area although other chapters also cover the values of, and activities that occur within, the coastal marine area and wider coastal environment (e.g., natural character, landscape, public access, water transportation).

The MSRMP utilises zoning and the regulatory provisions of the MSRMP are generally structured according to each zone. The rules are contained in Volume 2 of the MSRMP, while the zones are mapped in Volume 3 of the MSRMP. Regional rules and district rules apply within each zone, including rules to allocate coastal space and rules to control occupation of coastal space.

Written Comment No: 0391

The regional coastal plan provisions were approved by the Minister of Conservation on 13 March 2003 and were made operative on 28 March 2003. The Key Issues Report prepared for the NZKS Board of Inquiry contains more information on the passage of these provisions through the First Schedule process of the RMA (at pages 50-53).¹

The regional coastal plan component of the MSRMP includes provisions managing marine farming in the coastal waters of the Marlborough Sounds, including the allocation of coastal space. This reflects that marine farming was a significant use of those waters at the time of notification (and still is). Marine farming is defined in the MSRMP (in Chapter 25 of Volume 2) as follows:

Marine farming means the activity of breeding, hatching, cultivating, rearing, or ongrowing of fish, aquatic life, or seaweed for harvest (and includes spat catching and spat holding) when carried out on a marine farm; but does not include:

- a) Any such activity where fish, aquatic life, or seaweed are not within the exclusive and continuous possession or control of the holder of a marine farming permit; or*
- b) Any such activity where the fish, aquatic life, or seaweed being farmed cannot be distinguished, or be kept separate, from naturally occurring fish, aquatic life, or seaweed.*

As a result of this definition, the MSRMP makes no distinction in a planning context between the different types of species able to be farmed. This approach has provided marine farmers with flexibility to choose the species they grow at each site. This is reflected in the way in which coastal permits for marine farming have historically been applied for and granted. Applicants have typically requested authorisation to grow a range of species, including Green Shell Mussels (*Perna canaliculus*), Blue Shell Mussels (*Mytilus edulis*), Dredge Oysters (*Tiostrea lutaria*), Scallops (*Pecten novaezelandiae*), Pacific Oysters (*Crassostrea gigas*) and Seaweed (*Macrocystis pyrifera*, *Eklonia radiata*, *Gracilaria*, *Pterocladia lucida*). A total of 59 species of fish, algae and other forms of aquatic life have been approved for marine farming in the coastal waters of the Marlborough Sounds through the resource consent process or through marine farm licences.

The MSRMP divides the coastal marine area of the Marlborough Sounds spatially into five zones. Zoning is a tool commonly used by local authorities, especially territorial authorities, to apply a regulatory framework to a distinct spatial area. That regulatory framework will typically enable particular activities to occur. In this way, zoning functions to predetermine the sustainability of new and existing activities that occur in a defined spatial area.

Although usually used in the context of land use planning, the Council chose to utilise zoning in the coastal marine area in addition to land. Only three of the zones are relevant to this proposal, Coastal Marine Zone 1 (CMZ1), Coastal Marine Zone Two (CMZ2) and Coastal Marine Zone Three (CMZ3).

The Key Issues Report referred to above contains information on how CMZ1 and CMZ2 were established as a result of decisions on submissions (see Pages 50-52). CMZ1 and CMZ2 have contrasting provisions managing marine farming in the coastal marine area of the Marlborough Sounds.

¹ Section 149G(3) of RMA 1991 requires the Environmental Protection Authority to commission a report from the local authority on the key issues in relation to any proposal the Authority is considering.

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Rule 35.6 of the Coastal Marine Zone rules prohibits marine farming in CMZ1. Note that 3 of the 6 potential relocation sites (in terms of the proposed zones) are proposed to be located in CMZ1, while another two sites have part of their footprint in CMZ1.

In contrast to CMZ1, the regulatory provisions that apply to coastal water zoned CMZ2 provide people with the opportunity to make applications for coastal permits to establish and operate marine farms. The status of marine farming in CMZ2 varies and is either a controlled activity (Rule 35.2.5 of the Coastal Marine Zone rules), a discretionary activity (Rule 35.4.2.9 of the Coastal Marine Zone rules), or a non-complying activity (Rule 35.5 of the Coastal Marine Zone rules). The distinction between the different activity categories can be summarised as follows:

- farms originally authorised prior to 1 August 1996 are a controlled activity, subject to standards and terms;
- farms established after 1 August 1996 and new farms are a discretionary activity provided they are located no closer than 50 metres from mean low water mark and no further than 200 metres from the mean low water mark; and
- farms that do not comply with the standards specified in the relevant rules are non-complying activities.

To describe the distinction in another way, historic marine farms (ie, pre 1996) are effectively 'grandfathered', as resource consent applications to continue marine farming at the same site must be granted. The explanation to Issue 9.2 of the Coastal Marine Chapter sets out that the controlled activity status recognises the contribution that these historic farms make to the social and economic wellbeing of Marlborough. The Council can exercise discretion over any other application for marine farming at a proposed or existing marine farm site, although the extent of considerations may be greater for those farms proposed to be located in excess of 200 metres from the mean low water mark.

CMZ3 was established as a result of the NZKS Board of Inquiry decision. In its plan change request, NZKS proposed a CMZ3 zone to specifically provide for the activity of salmon farming. That proposal involved 8 sites of CMZ3 in coastal space zoned CMZ1 (at the time). Four sites were approved by the Board in its decision dated 22 February 2013 (Waitata, Richmond, Ngamahau and Papatua). On appeal, the Supreme Court reversed the decision of the Board with respect to the Papatua site.

The CMZ3 zone has a specific set of provisions to manage the potential adverse effects of salmon farming at each of the three approved locations (see Rule 35.4.2.10 of the MSRMP). These include a prescriptive list of standards (11 standards) and assessment criteria (15 criteria). The first standard restricts marine farming within the zone to the farming of King Salmon.

Any application for resource consent under the provisions is to be considered as a discretionary activity.²

² Note that the plan change request and resource consent applications considered by the Board of Inquiry were concurrent.

Proposed Provisions

The consultation document contains potential amendments to the MSRMP in Appendix 1. In summary, the regulatory framework that forms part of the proposal consists of an additional zone, Coastal Marine Zone 4, and an accompanying suite of rules for managing salmon farming in the zone. This includes Appendix D4, which contains 59 “standards”. There is also an allocation method to enable the relocation process to occur.

The Council considers that there is a risk that the creation of an additional regulatory framework for farming salmon in the Marlborough Sounds, in addition to the operative provisions described above, creates a disparate planning framework for managing the same activity in the same environment.

The use of an alternative zone and zone provisions is justified in the proposal on the basis of relocation - “to provide a mechanism to relocate existing salmon farms from areas of low water flow to deeper areas with higher water flows”. However, it is possible for the allocation mechanism to operate with an existing zone.

If Ministerial powers are to be exercised to amend the MSRMP, the Council encourages the use of provisions that integrate with the operative provisions. As CMZ3 was established to provide for salmon farming it would have a preference for this operative zoning to be applied to any appropriate location. In this manner, salmon farming would be consistently managed in the coastal marine area of the Marlborough Sounds.

Salmon farming in the Marlborough Sounds

Salmon farming has been occurring in the Marlborough Sounds for more than 30 years. NZKS is the only company currently farming salmon within the Sounds. It has 11 consented farm sites. These include:

- Six sites operating under coastal permits (in blue in Table 1);
- Three sites approved by the NZKS Board of Inquiry (in green in Table 1).
- Two sites (in Crail Bay) that are consented but which have not been farmed since 2011 (in red in Table 1).

More information on the consents is provided below.

Farm	Location	Consent	Expiry	Flow rate	High/Low flow site
Waihinau	Pelorus Sound/Te Hoiere	MFL456	31/12/2024	8.4	Low
Forsyth	Pelorus Sound/Te Hoiere	U040412	21/12/2024	3	Low
Otanerau	Queen Charlotte Sound/ Tōtaranui	U040217	31/12/2024	6	Low
Ruakaka	Queen Charlotte Sound/ Tōtaranui	U021247	07/05/2021	3.7	Low
Clay Point	Tory Channel/Kura Te Au	U160675	1/12/2036	19.6	High

Te Pangu	Tory Channel/Kura Te Au	U150081	01/02/2036	15	High
Waitata	Pelorus Sound/Te Hoiere	U140294	17/04/2049	17.6	High
Kopāua (Richmond)	Pelorus Sound/Te Hoiere	U140295	17/04/2049	15.7	High
Ngamahau	Tory Channel	U140296	17/04/2049	21.1	High
Crail Bay MFL048	Pelorus Sound/Te Hoiere	U090634 (not operating)	31/12/2024	3	Low
Crail Bay MFL032	Pelorus Sound/Te Hoiere	U090660 (not operating)	31/12/2024	3	Low

Table 1: Coastal permits held by NZKS

The table includes information on flow rates. Farms with a flow rate less than 10cm/sec are considered to be low flow sites. Farms in low flow environments receive greater concentrations of organic material beneath the pens than higher flow farms where particles are more widely dispersed.

Most of the consents require annual monitoring as a condition of consent. NZKS undertake voluntary annual monitoring of the other site (at Waihinu). The last round of monitoring results was provided to the Council on 29 February 2016 and reported to the Council's Environment Committee on 5 May 2016. The monitoring results covered the Forsyth Bay, Waihinu Bay, Ruakaka Bay, Otanerau Bay and Clay Point farms.

Each farm has a report on the biochemical and biological state of the seabed prepared by the Cawthron Institute. The monitoring results showed that the farms were compliant with environmental quality standards within individual consents, where such standards exist. However, the monitoring also demonstrates that the Forsyth and Otanerau farms continue to perform poorly with excessively enriched conditions underneath the pens. There were also indications of enrichment at Ruakaka.

Note that there is further commentary on the environmental quality standards relative to Best Practice Guidelines below.

Best practice guidelines

There are ongoing concerns regarding the sustainability of existing low flow sites in terms of benthic impacts. These concerns were probably focussed as a result of the Board of Inquiry process, which took into account the evolving science on benthic effects of salmon farming.

The coastal permits identified in Table 1 were granted at different times and under varying circumstances. The conditions on which those coastal permits were granted vary as a result. The environmental standards applied vary from salmon farm to salmon farm, depending on when the coastal permits were granted.

To provide a consistent approach to the monitoring and management of benthic effects of salmon farming, NZKS volunteered to work with the Council, scientists and the community to develop best practice guidelines post Board of Inquiry.

Council sought the advice of Professor Kenneth Black of the Scottish Association for Marine Sciences to identify where the consent monitoring could be improved. Professor Black visited Marlborough in 2013 and provided expert review as the guidelines developed.

With the benefit of more science about the environmental impact on the seafloor of salmon farming, this collaborative approach developed clear performance targets that aim for well managed salmon farming in balance with the ecology of the Marlborough Sounds.

NZKS and Council sought public comment on the guidelines in October 2014. Some minor changes were made and the guidelines were presented to the Council in November 2014.

The Benthic Guidelines specify Environmental Quality Standards to provide the environmental 'bottom lines' against which effects of salmon farming are assessed in respect to the seabed. The guidelines adopt a quantitative enrichment stage scale to characterise the benthic state. The guidelines specify an industry operational goal enrichment scale less than or equal to 5 (described as very high enrichment).

Consents granted in history have a more qualitative description of environmental quality standards which equates to a higher permitted enrichment stage than the best practice guidelines (approximately equivalent to an enrichment scale of less than or equal to 6).³

Monitoring of benthic effects beneath NZKS's farms since 2012 has indicated that while four consented low-flow farmed sites comply with existing consent requirements, decreases in feed input levels are likely required for these sites to comply with the accepted maximum enrichment scale 5.

The general consensus (including that of the Marlborough Salmon Working Group) is that the low flow sites cannot meet best practice without significant destocking of the farms. On the expiry of the existing coastal permits (as set in Table 1), the adverse benthic effects are an obvious issue that would have to be addressed by NZKS as an applicant preparing an assessment of environmental effects and by the Council in terms of exercising its functions under Section 104 of the RMA 1991.

Prior to the work of the Marlborough Salmon Working Group, the expectation was that New Zealand King Salmon would progressively put them into practice at the company's existing sites in Pelorus and Queen Charlotte Sounds.

Navigation Risk

The proposed mid-channel Waitata site has been assessed by the Council's Harbourmaster as increasing navigation risks. The Ministry of Primary Industries engaged Navigatus to consider this risk. Council's Harbourmaster is making a separate submission adding to his earlier input to the Marlborough Salmon Working Group. In summary, the Harbourmaster believes that the proposed farm increases navigation risks by altering what is a "recognised navigation route", but also identifies

³ The three farms approved by the Board of Inquiry in 2013 already have more stringent consent conditions to address benthic effects of the activity.

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that a range of mitigation measures are available. These measures could be investigated in more detail.

Section 360 of the RMA

The Council acknowledges that the Minister may amend provisions in a regional coastal plan that relate to the management of aquaculture activities in the coastal marine area.

The Council has supported MPI in the process of addressing the sustainability issues that exist at low flow sites in the Marlborough Sounds, including through participation in the Marlborough Salmon Working Group. The Council supported the aims of the Marlborough Salmon Working Group and has considered the report it prepared for the Minister. The objective should be for all salmon farms in the Marlborough Sounds to implement the Benthic Guidelines.

The Benthic Guidelines address the effects of salmon farming on the benthic environment only. Salmon farming can result in other adverse effects on the surrounding environment, including adverse effects on water quality and on landscape, natural character, amenity, social and cultural values. The Council supports the current consultation process, provided that the outcome of the process is not inconsistent with Part 2 of the RMA and that the provisions of the MSRMP continue to give effect to the NZCPS.

Written Comment No: 0576

Subject	Potential relocation of salmon farms in the Marlborough Sounds
From	Luke Grogan-8303
To	aquaculture submissions
Cc	Pere Hawes-5143
Sent	Monday, 27 March 2017 3:12 p.m.
Attachments	<<Navigation Submission.pdf>>

Good Day,

Please find attached my submission in regards to the potential relocation of salmon farms in the Marlborough Sounds. I will be available to speak at the hearing in April as required.

Regards,

Luke Grogan

Harbour Master

[REDACTED]
Blenheim
[REDACTED]
[REDACTED]

www.cruiseguide.co.nz<<http://www.cruiseguide.co.nz/>>

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Thank you.

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A submission on the Salmon Farm Relocation Proposal

1. The following is the Marlborough Harbour Masters submission to the MPI consultation document "Potential relocation of salmon farms in the Marlborough Sounds". The submission only makes reference to one of the proposed sites namely, the Mid Channel Waitata site.
2. The Harbour Master is willing to speak at the April hearing as required.

The Marlborough District Council Harbour Master

3. The Harbour Master is appointed under the section 33D of the Maritime Transport Act 1994 and carries statutory responsibilities for ensuring maritime safety in the waterways of the region. In meeting these obligations, the Marlborough Harbour Master submits the following navigation safety information to complement the 2016 technical navigation report produced by Navigatus Consulting for the Ministry of Primary Industries.

Navigation Risk and Mid Channel Waitata Site

4. The Waitata Reach serves as the only seaward entry point into the Pelorus Sound.
5. Any vessel entering the Pelorus Sound at night, either from the Te Kakaho Channel or from the East will immediately sight the Maud Island navigation light. The light is strategically positioned on a significant headland approximately 8.5 nautical miles from the entrance to Waitata Reach to achieve maximum visibility. The light has a nominal range of 10 miles and is the most visible navigation light in the Pelorus Sound.
6. The Maud Island light provides vessels seeking refuge from the Cook Strait with a safe course to steer down the Waitata Reach at night. A vessel steering toward the Maud Island light is following the recognised navigational route down the Waitata Reach.
7. A recognised navigational route is described in the Maritime New Zealand Aquaculture Management Areas and Marine Farms Guidelines 2005 (the Guidelines) as;

A safe sea passage and commonly used by vessels navigating in that area. The recognised navigational route may be one used by commercial vessels to & from ports, and may also include pleasure craft which are normally used to navigate between popular destinations

8. While not legally binding, the purpose of the guidelines as noted in section 2.1 of the document is;

to identify relevant navigational issues and describe the criteria that councils and marine farm applicants should be aware of during the process of the creation... establishment and management of marine farms.
9. Non-compliance with the Guidelines indicates an increase in navigation safety risk.

10. In paragraph 5.22 the Guidelines specify that marine farms shall be kept clear of recognised navigational routes.
11. The proposed location of the Mid Channel Waitata site will obstruct the recognised navigational route into the Waitata Reach and this generates an increase in navigation safety risk.
12. In paragraph 5.14 the Guidelines reference the importance of ensuring the preservation of places of refuge.
13. The Waitata reach provides a place of refuge for vessels navigating in the Cook Strait. The proposed farm complicates access to this safe refuge and this in turn, generates an increase in navigation safety risk.
14. The proposed Mid Channel Waitata site narrows the navigable waterway through the Waitata Reach by dividing it into two distinct passages north and south of the farm. Each of these passages is significantly narrower than presently exists.
15. In general, collision risk between vessels increases when a waterway is narrowed and vessel traffic remains constant.
16. Collision risk between vessels is likely to increase in the vicinity of the Mid Channel Waitata site.
17. Collision risk between vessels is a high consequence risk that must be evaluated within the context of the Mid Channel Waitata site.

Summary of Risk

18. The following navigation safety risks have been identified by the Marlborough Harbour Master.
 - obstruction of the recognised navigational route into the Waitata Reach
 - the effect of the Mid Channel Waitata site in complicating access to a place of refuge
 - the effect of the Mid Channel Waitata site in narrowing the navigable waterway with particular regard to collision risk between vessels
19. These risks are not identified or addressed in the navigation report produced by Navigatus Consulting.

Risk Mitigation

20. The extent and significance of these risks must be properly quantified in order to identify effective mitigation measures. Although this work has yet to be done the following list indicates the types of mitigation measures that may be employed.
 - Additional land and sea based navigation lights and radar beacons

Author: Captain Luke Grogan,
Harbour Master
Marlborough District Council
Blenheim



- Amendments to charts
- Radar and camera imaging
- Enhancement of the AIS network
- Provision of a vessel traffic service or local port service
- VHF radio reporting points
- Promulgation of real time site specific weather and current data
- Strategic use of high visibility markings and paint on farm structures
- Controlled speed zones
- Type specific vessel exclusion zones
- Marine farm lighting
- Public education

21. Mitigation of the aforementioned risks may not require implementation of all of the listed measures. Mitigation measures may be added, removed or adjusted as the risk profile of the area changes over time.

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