

# Contents Page: Pinder - Pope-Bell

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

Written Comments Number	Last Name	First Name
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## Written Comments No: 0361

Subject	<b>Submission</b>
From	<u><a href="#">marty</a></u>
To	aquaculture submissions
Sent	Friday, 24 March 2017 9:35 AM
Attachments	<<Potential-Relocation-of-Salmon-Farms-in-the-Marlborough-Sounds-Feedback-form-Word-version.docx>> <<Blue Cod with salmon pellets in gut.jpg>> <<076.JPG>> <<078.JPG>> <<079.JPG>>

Attached also that I wish you to print and attach to my submission, preferably in A4 format the photographs that are referred to in my submission.

jpg.76,78 and 79 are of a Hump back whale entering Oyster Bay at Tio Point.

Regards

Martin Pinder

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

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

Comments can be:

**Submitter:** Martin Pinder [REDACTED] Blenheim. [REDACTED]  
[REDACTED]

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

### Consultation questions

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

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

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

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

### Written comments are official information

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

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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

### STATEMENT OF SUBMITTER

The process MPI have engaged in is undemocratic.

MPI are fully aware of the Community feelings on the matter of salmon farms but have failed at every opportunity to provide the same level of resources and funding to enable a fair and balanced review of the proposed relocation ( actually new sites ) to the Community MPI also serves.

I am a tax payer in Marlborough and to central government, yet I have not been provided any type of assistance to put my side of this discussion to the Independent Commissioners.

Hundreds of thousands of dollars of tax payers funds spent. Scientists, experts and the like have been engaged by MPI, to promote one outcome only; a decision in favour of New Zealand King Salmon.

This is process is objectionable and Government must be held responsible for its actions in this regard.

Martin Pinder

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## Questions

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### Question 1:

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

**No. I do not support this proposal in any form. This has already been tested through the correct process. King Salmon should have applied to do this when they submitted to the Board of Inquiry. It is very apparent that work to identify new sites was already underway either prior to or during the BOI.**

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**Because King Salmon failed at the BOI to get all its farms (feed lots) approved it has now lobbied Government for a means to circumvent the democratic process.**

**It is obvious to all that Community feeling in opposition to this government sponsored proposal is high, so much so that tens of thousands of private funding, and innumerable hours of resources were invested by the Community in Opposition to the feedlots for all the reasons it put forward at the BoI.**

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### Question 2:

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

**From the perspective of circumventing the democratic process I am sure the experts have identified all the best sites from an operators point of view.**

**However there is no good and just reason why any feedlot should be permitted to move unless it has been fully examined and cross examined by the Community. Unless Government is prepared to give the same resources, funds and experts to the- communities that oppose salmon feedlots then this exercise will always be considered for what it is now, Government sponsored Corporate Welfare.**

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### Question 3:

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

**None, unless the democratic process is followed as it has in previous times through the RMA.**

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### Question 4:

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

**Each of the existing sites has been allowed to pollute the immediate zone beneath it with noxious and toxic results. There is no reason to enable this to occur in new pristine sites**

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Each of these sites introduce tons of nitrogen to the sounds water ways yearly via its feed.

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### Question 5:

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

**The benefits are solely for the operator. The cost is at the cost of the environment, amenity values, tourism, recreational enjoyment, algal blooms, noise, suspended filth in the new locations from net cleaning, seal population rise – the list goes on.**

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### Question 6:

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

**At each existing site the seabed must be vacuumed clean of the toxic mats created from uneaten food and excrement from the fish on a frequent basis, annually should be the minimum. It is recognised by all parties this pollution is a severe problem.**

**This becomes of greater importance as farms are bunched together in close proximity as proposed in Tory Channel.**

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### 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?

**NO, no site should be approved unless it has been through a fair, transparent and robust RMA process. Anything less is wrong.**

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### Question 8:

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

**No farm should increase its area unless it has been through the present processes to gain that approval.**

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### Question 9:

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

**Aquaculture is an intrusion on the public commons. It has only managed to expand and take more water for its own profit. The water space if vacated for any reason should be returned to the public domain.**

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### Question 10:

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

**See 9. No – pay them compensation.**

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### Question 11:

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

**NO. Staged adaptive management of putting uneaten feed, fish faeces and nitrogen into the water of the Marlborough Sounds is short sighted in the extreme.**

**Relocated farms equals more fish to feed which in turn equates to more nitrogen, fish waste, faeces, more net cleaning flushing debris into the water column..**

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### 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. There is nothing democratic about this process. And I cannot agree to the wording.**

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### Question 13:

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

**The continual acceptance by the feed lot operator and Marlborough district council, is that it is acceptable for the operator to foul the seabed and water column.**

**Since when did pollution become acceptable in any civilised society.**

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### 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?

**If the MPI gave as much 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.**

**Priority from the operator perspective to enable greater profit no doubt. For the Community the priority is for it to have its water ways returned to it.**

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### 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.**

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And further from MFE;

**Aquaculture is increasing**

**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**

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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).

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### Question 16:

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

**These matters have already been exhausted in legal challenges. The landscape issue is subjective and whoever has the most resources to get the outcomes it wants wins.**

**There is no strategic vision for the future of the Sounds as a clean green tourist attraction to be nurtured, in this proposal. This is short term, profit for operators, view only.**

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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?

**Where was the counter view.? What can be done to the landscape to return it to its pristine state for generations to come?**

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**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?

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

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**Question 19:**

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

**Extremely worrying. Larger pens, more fish, greater pollution from increased production from feed and faeces**

**The cumulative effects will be wide. Logic dictates that what goes in does not come out, it simply gets swilled around in the waters of the Sounds.**

**Since when did pollution become acceptable in any civilised society?**

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**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?

**NO. The purpose is to intensify feeding of the salmon how can that be mitigated?**

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**Question 21:**

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

**Yes, 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.**

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**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?

**How water quality effects the kelp, the paua, the shellfish and the demersal fish.**

**Studies should be provided and be mandatory in any CMZ1 zone or any other zone that is proposed to be used for fin fish farming.**

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**Question 23:**

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

**It is indisputable fact that fish feed and fish faeces pollute the immediate environment, that oxygen is fully depleted in the mat build up on the sea floor. There is absolutely no benefit to the sea floor or the community of species that live within it.**

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**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 sites, this is common water and should not be exploited for profit in this manner.**

**No sites should be located in the water ways but on shore where all costs rest with the operator, not the ratepayer or environment.**

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**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?

**Yes, effects on demersal fish, paua, shellfish and worms etc.**

**Studies should be conducted, peer reviewed and and be mandatory in any CMZ1 zone.**

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**Question 26:**

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

**Studies should be provided and be mandatory in any CMZ1 zone**

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**Question 27:**

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

**Studies should be provided and be mandatory in any CMZ1 zone**

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**Question 28:**

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

**Studies should be provided and be mandatory in any CMZ1 zone**

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**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.**

**I have photographs of a hump back whale foraging at the entrance to Oyster Bay.**

**Since the new feedlot at Ngamahau no dolphins have been sighted in the past 12 months, This is very unusual as dolphin have been sighted many times through previous years.**

**Feedlot anchor lines will disrupt all mammals at some point in time. Machinery noise, lights, increased boat traffic, all contributes to an environment any mammal would not, by choice tolerate.**

**Studies should be provided and be mandatory in any CMZ1 zone**

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**Question 30:**

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

**Studies should be provided and be mandatory in any CMZ1**

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**Question 31:**

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

**Paid for by the operator, King Salmon and independently peer reviewed. This should be mandatory in a CMZ1**

**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,**

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**Question 32:**

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

**Frankly this is intensive fish feeding. No different from chicken farms, or piggeries or dirty dairying. Salmon must have its flesh coloured artificially, salmon has more fat in it than wild fish and the intensive farming is cruel for the fish, so husbandry is hardly a key consideration for the operator other than getting the most fish produced in a short amount of time.**

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No mention from MPI about the native fish that feed on the salmon feed, or the effects on wildfish from these intensive feedlot operations. A study of the effects on native fisheries is essential

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**Question 33:**

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

**Yes, as I skipper my boat through the feedlot areas I am distracted by the presence of these eyesores and need to be constantly alert to increased boat movements by supply vessels to and from the farms and staff movement between them.**

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**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?

**Daft**

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**Question 35:**

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

**There are many recreational values compromised by farm structures. Recreational boating is restricted in those areas. Service vessels are a nuisance to tourism and local boat movements, as they only serve the purposes of the farms. The farms are unattractive and out of character for a marine environment.**

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**The Sounds needs to be attractive to tourism, after all tourism is the largest income earner for NZ. These short sighted, short profit industrial, operations are an anathema.**

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**Question 36:**

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

**You cannot remedy or mitigate the presence of an Industrial operation in a seascape right on the tourist route of the Ferries, other than by not placing them there in the first place or ultimately to remove them all to the open sea.**

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**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 18<sup>th</sup> and 19<sup>th</sup> century. There is a very rich history concentrated in this part of Tory Channel.**

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**Question 38:**

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

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**Question 39:**

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

**Already 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.**

**I 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**

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**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?

**These effects are known and demonstrated. Farm staff are known to fish and take shellfish from the surrounding areas. This pressure is unreasonably concentrated now in Tory Channel and will only worsen with the addition of yet another farm.**

**Cumulative effects of concentrated alien structures and presence in very close proximity to each other. This effect is transmitted to tourists and travellers alike through the Ferry route. These effects are negative to the promoted clean green New Zealand theme. Salmon feed lots are no different in a persons' eye to battery chicken**

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**farms. Simply stated as, intensive and insensitive food production on an Industrial Scale.**

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

### **Demersal Fish.**

No mention in this extensive questionnaire has there been mention of demersal fish. These fish are 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 is critical to the wellbeing of native fisheries. Any further introduction of relocated farms will be detrimental to the blue cod in Tory Channel. I request 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 shelled inhabitants of the sea floor. I request Scientific studies of the sea floor and within the shadow of the proposed farms to determine numbers and health of this fish (and for this to be ongoing monitored) & presented prior to any decision made on relocating farms.

### **Paua**

The iconic Paua, 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 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 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. I 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 effect from the farm placement and effects shadow will there be on kelp forests and sea weed. I request Scientific studies are undertaken and presented prior to any

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**decision being made on farm placement, and for this also to be ongoing and independently monitored.**

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### **Amenity**

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

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**New Zealand King Salmon are not a good neighbour.**

**In my family's 30 years of owning property in Tory Channel no benefit to the local area is apparent from the occupation of water space by King Salmon.**

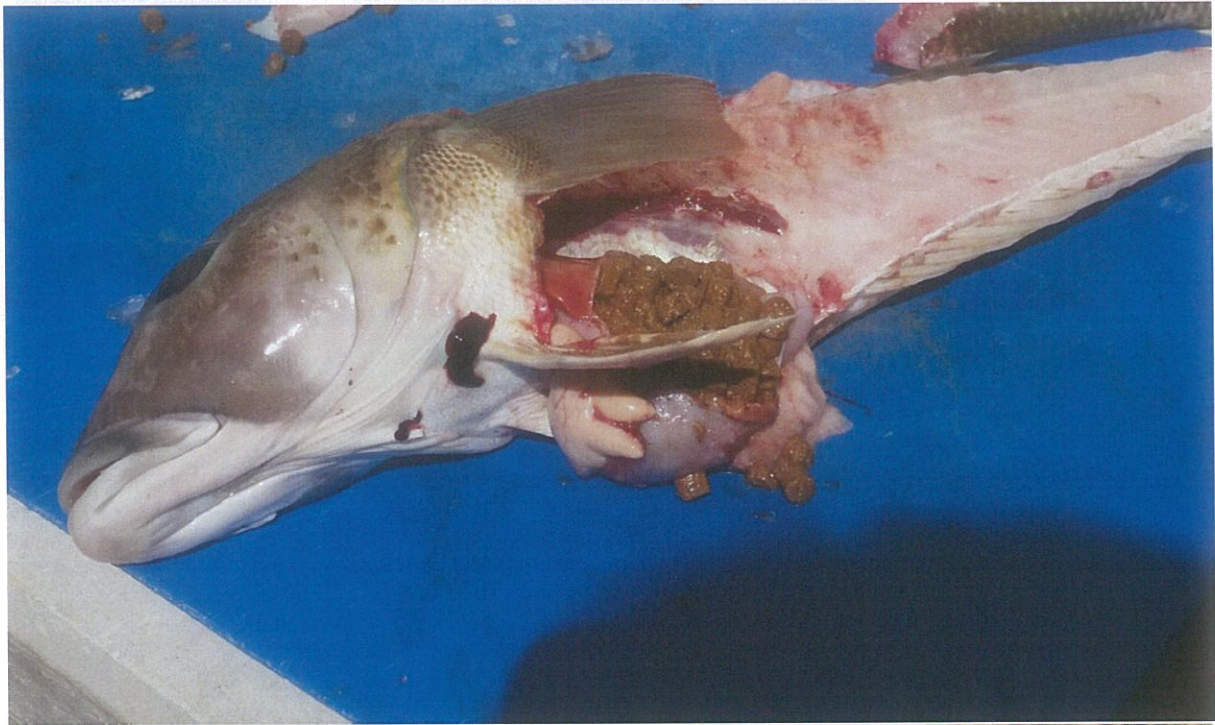
**They add no value to property and devalue property that they become neighbours with.**

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

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This image shows a single sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.







## Written Comment No: 0569

Subject	Fw: sf
From	<a href="#">Stephen Pitman</a>
To	aquaculture submissions
Sent	Monday, 27 March 2017 3:32 p.m.

Submission on Salmon Farm Relocation from Stephen Pitman

Salmon Farm Relocation

Ministry for Primary Industries

Private Bag 14

Port Nelson

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

To: The Salmon Relocation Advisory Panel

### Introduction

Submission from Stephen Pitman.

[REDACTED], Christchurch 8083

I am a medical General Practitioner working Kaiapoi, and I live in Burwood, Christchurch.

My interest in the Marlborough Sounds stems from my involvement, as a shareholder, with Puriri Preservation Ltd, which has a property at Puriri Bay in East Bay, Arapawa Island. I have visited this area on multiple occasions over the last 35 years. The property at Puriri Bay is in close proximity to the Otanerau farm in East Bay. My submission is as an individual- as property (part) owner and holiday maker to the Sounds. I am not submitting on behalf of the Puriri Preservation Ltd or as my role as a doctor.

### Opinion

I **DO NOT** support the Salmon Farm Relocation proposal

- 1) The correct process is not being followed.

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I am opposed to the proposal because I believe the correct process to decide on further expansion of salmon farm aquaculture in the Marlborough Sounds is not being followed.

The Marlborough District Council is in the process of developing its new Aquaculture Plan. The development of this plan was delayed by the Aquaculture industry last year. I consider that the correct process for deciding on further expansion of salmon farming in the Sounds is for it to be done under this new plan once it has been completed. This process would include hearing the views of the public that consider that the Sounds has a unique environment that they do not want degraded by the expansion of industrial scale fish farming. It is my opinion that the minister is wrong to consider it necessary that the planning for one company's interests be addressed before the Marlborough District Council has completed its new Aquaculture plan. I do not think the Minister should deem New Zealand King Salmon's desire to "meet demand", hence increase their profits, a matter of national or regional significance.

2) This is not a fair swap.

I do not consider the proposal to be a fair swap. If I had six farms in the Canterbury Hill Country I wouldn't expect to be able to swap them for six similar sized farms in the productive Waikato dairy lands. I therefore do not consider it fair or reasonable that New Zealand King Salmon should be able to swap six poorly performing farms, some currently not economical or environmentally sustainable to run at all for six farms in high productivity areas where they can increase their feed levels, and hence salmon effluent plus other pollution, discharged into the environment.

From my reading of the information provided in the proposal, it appears that of the six proposed current sites, only two are currently operational, and two are fallow, and the two in Crail Bay are not operational. I argue that the Crail Bay sites are in such unsuitable and unusable areas that they should not be part of any swap consideration. So there is approximately 9 hectares of site that is proposed to swap (one hectare of which is the unusable two Crail Bay sites). In this area NZKS currently put in approximately 3,400 tonnes of feed, and if the two fallow sites are put into operation again this would be approximately 7,700 tonnes of feed going in each year (according to historic averages).

The six new sites are said to be approximately 7.8 hectares of farm surface but with approximately 24,600 tonnes of feed going in. So this is about three times at least what they would be putting in if the four current sites (excluding the Crail Bay ones) were all operating at recent levels. I imagine that the tonnes of fish produced is proportional to the amount of feed going in, and it may well be better at these proposed new sites, so the tonnes of fish produced under the proposed plan would be increasing by approximately three times.

I do believe that the farms should meet the new Benthic guidelines and I do accept that the proposed sites are in areas of higher flow where there is less likely to be damage to the sea floor than what occurs at the current sites, but the current proposal is more about expansion of production than what I consider a fair swap. A fair swap for the six current sites would be for an area of new site area that involves the "status quo" - of around

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8,000 tonnes of feed going in, which would be 1 or two new sites -if such sites were deemed suitable.

I am of course keen for the farm at Otanerau to go, and the site to be re-mediated if that is considered necessary and possible, but I'm very concerned about the impact the proposed new sites would have on the wider sounds environment-not just the detrimental effects on the seabed under the proposed new farms.

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

I appreciate the opportunity to voice my opinion.

Name: Stephen Timothy Pitman

Email: [REDACTED]

Date: 27/03/17

Phone: [REDACTED]

Relocation of Salmon Farms in Marlborough Sounds

Anna Plumtree

I have been working for King salmon for 22 years and I have seen a lot of different quality fish come through the factory. I think moving the farms to high flow sites will give us healthier fish, better quality and will be better for production. Better quality will get more money and more customers. It will provide more jobs. It will be better for the environment in the sounds as well.

Anna Plumtree



22 / 2 / 14.

## Written Comments No: 0476

Subject	Re potential relocation of salmon farms in the Marlborough Sounds, submission VNP
From	<u>val podmore</u>
To	aquaculture submissions
Sent	Sunday, 26 March 2017 1:07 p.m.
Attachments	<<3. MEC salmon farm relocation proposal VNP submission.docx>>

Please find attached my submission.

Valerie N Podmore



Queen Charlotte Sound



## Potential Relocation of Salmon Farms in the Marlborough Sounds

### COMMENTS FORM

Comments closes 5pm, 27 March, 2017

#### Your details

NAME: Valerie N Podmore (Dr)

ORGANISATION (if applicable):

CONTACT PERSON: Dr Valerie Podmore

POSTAL ADDRESS: [REDACTED] Picton 7250

EMAIL: [REDACTED]

DAYTIME PHONE: [REDACTED]

MOBILE: ---

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

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

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

DATE: 26 March 2017

## Written Comments No: 0476

I OPPOSE the relocation proposal for the following reasons:

Issue	Comment
1. Process	<ul style="list-style-type: none"><li>• The use of Section 360A of the RMA gives the Minister of Aquaculture the power to over-ride the Marlborough Sounds Resource Management Plan.</li><li>• It takes decision-making and resource management away from the Marlborough District Council and local community.</li><li>• It disregards the 2013 Board of Inquiry [BOI] and 2014 Supreme Court decisions about expansion of salmon farming into prohibited areas of the Marlborough Sounds.</li><li>• The proposal provides commercial benefit for one company, using public water space for free, above the interests of other users of the Marlborough Sounds, including iwi.</li><li>• It sets a precedent for the Minister to make similar water-grabs around New Zealand, usurping the power of local authorities and wishes of local communities.</li></ul>
2. Precautionary approach	<ul style="list-style-type: none"><li>• Policy 3 of the NZ Coastal Policy Statement calls for a precautionary approach. This was reinforced by the BOI decision [par 179].</li><li>• The three new high flow sites granted by the BOI are only just coming on stream. It would be precautionary to wait until monitoring shows the company can operate these sites, along with their other high-flow sites, to comply with the Benthic Guidelines at maximum feed levels for at least three years before any more space is considered. [consistent with BOI Condition of Consent 44a]</li><li>• This especially applies to Tio Point, which would be the fourth salmon farm in close proximity in Tory Channel.</li><li>• In the meantime reduce the feed and stocking rates at the low flow sites to meet the Benthic Guidelines.</li></ul>

## Written Comments No: 0476

<p>3. Nitrogen pollution</p>	<ul style="list-style-type: none"> <li>• We dispute the accuracy of Minister's statement: "This proposal is about making better use of existing aquaculture space. There is no proposed increase in the total surface structure area used for salmon farming in the Marlborough Sounds," – Nathan Guy, Minister of Aquaculture.</li> <li>• The proposed relocation sites are not "existing aquaculture space". They are <b>prohibited</b> to aquaculture.</li> <li>• While farm surface area may remain about the same, there is a proposed five-fold increase in fish feed to 24,600T a year.</li> <li>• With more feed and more fish, the amount of nitrogen pollution discharged into the Sounds through salmon faeces would also increase. The high-flow farms would be discharging the equivalent of the nitrogen in sewage from a city the size of Christchurch, straight into the sea.<sup>1</sup></li> <li>• Residents must meet strict obligations to keep waste out of the enclosed waters of the Sounds. Yet this proposal would allow the untreated discharge of polluting nutrients from six new salmon farms.</li> <li>• As a land-based comparison of low flow and high flow sites, it is not OK for a dairy farmer who has been pulled up for discharging effluent into a small stream to resolve the issue by increasing his herd and discharging to a faster river.</li> </ul>
<p>4. Offshore Alternatives</p>	<ul style="list-style-type: none"> <li>• The NZKS Supreme Court decision ruled there was an obligation to consider alternatives under the NZ Coastal Policy Statement and Section 32 of the RMA. <b>"Particularly where the applicant for a plan change is seeking exclusive use of a public resource for private gain."</b> [SC 172-173]</li> <li>• Having salmon farms offshore (open ocean aquaculture) rather than in the confines of the Marlborough Sounds would dilute the pollution and remove the conflict with other users. This approach is being used in countries such as</li> </ul>

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

## Written Comments No: 0476

	<p>Norway.</p> <ul style="list-style-type: none"> <li>Offshore alternatives are barely mentioned in this proposal. 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.</li> <li>Rather than pushing this relocation proposal for areas prohibited to aquaculture, MPI and the industry should invest in research to expedite offshore farming as a future-proofed alternative.</li> </ul>
5. King shag	<ul style="list-style-type: none"> <li>Policy 11 of the NZ Coastal Policy Statement calls for protection of indigenous species in the coastal environment.</li> <li>The NZ King Shag is classified as nationally endangered and is found only in the Marlborough Sounds. It is a taonga for Ngati Kuia and Ngati Koata.</li> <li>King Shag are sensitive to disturbance when breeding, roosting and feeding. Duffers Reef to the Waitata Reach, where five new farms are proposed, are key areas for these activities.</li> <li>The threat to King Shag was a factor in the BOI restricting the number of new farms in the Waitata Reach to two in its 2013 decision [BOI 1252 ]. Yet this latest proposal is seeking another five farms in the King Shag foraging area.</li> </ul>
6. Landscape and Cumulative effects	<ul style="list-style-type: none"> <li>This proposal will degrade the Outstanding Natural Landscapes and High Natural Character values of the Waitata Reach. <sup>2</sup></li> <li>The Board of Inquiry decision identified the threshold number of salmon farms for Waitata Reach as TWO – Waitata and Richmond – and turned down three others because of the cumulative effects on Landscape, Natural Character, King shag feeding and Tangata Whenua values. [BOI 1252]</li> <li>NZKS and MPI have ignored this ruling, which was arrived at after a long and considered judicial</li> </ul>

<sup>2</sup> Marlborough Landscape Study August 2015 by Boffa Miskell and Marlborough District Council, page 108; Natural Character of the Marlborough Coast, Defining and Mapping the Marlborough Coastal Environment, June 2014 by MDC, Boffa Miskell, DOC, Landcare Research and Lucas Associates, page 75.

## Written Comments No: 0476

	process. Instead they have joined forces and put forward this relocation proposal for FIVE more farms in the Waitata Reach. None of these farms can be justified.
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**Further comment:**

As a resident of Queen Charlotte Sound, I strongly support all of the above reservations. The rising temperature levels of the water in all suggested sites in the Sounds would require through, systematic, and independent monitoring prior to any continuation or relocation of salmon farms within the Marlborough Sounds. Accordingly, my conclusions are those stated below.

**In conclusion:**

There should be no discussion of more salmon farms in the Marlborough Sounds until NZ King Salmon shows it can operate the ones it has within the agreed benthic guidelines.

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

## Written Comment No:0487

Subject	<b>David Podmore's Submission re potential relocation of salmon farms in the Marlborough Sounds</b>
From	<u>Val Podmore</u>
To	aquaculture submissions
Sent	Sunday, 26 March 2017 2:41 p.m.
Attachments	<<3. MEC salmon farm relocation proposal DLP submission.docx>>

My submission with comments is attached. Thank you for considering this.

David Podmore

Resolution Bay, Queen Charlotte Sound

## Potential Relocation of Salmon Farms in the Marlborough Sounds

### COMMENTS FORM

Comments closes 5pm, 27 March, 2017

#### Details

NAME: David L Podmore (Mr)

ORGANISATION (if applicable):

CONTACT PERSON: David Podmore

POSTAL ADDRESS: [REDACTED] Picton 7250

EMAIL: [REDACTED]

DAYTIME PHONE: [REDACTED]

MOBILE: ---

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

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

DATE: 26 March 2017

## Written Comment No:0487

I OPPOSE the relocation proposal for the following reasons:

Issue	Comment
1. Process	<ul style="list-style-type: none"><li>• The use of Section 360A of the RMA gives the Minister of Aquaculture the power to over-ride the Marlborough Sounds Resource Management Plan.</li><li>• It takes decision-making and resource management away from the Marlborough District Council and local community.</li><li>• It disregards the 2013 Board of Inquiry [BOI] and 2014 Supreme Court decisions about expansion of salmon farming into prohibited areas of the Marlborough Sounds.</li><li>• The proposal provides commercial benefit for one company, using public water space for free, above the interests of other users of the Marlborough Sounds, including iwi.</li><li>• It sets a precedent for the Minister to make similar water-grabs around New Zealand, usurping the power of local authorities and wishes of local communities.</li></ul>
2. Precautionary approach	<ul style="list-style-type: none"><li>• Policy 3 of the NZ Coastal Policy Statement calls for a precautionary approach. This was reinforced by the BOI decision [par 179].</li><li>• The three new high flow sites granted by the BOI are only just coming on stream. It would be precautionary to wait until monitoring shows the company can operate these sites, along with their other high-flow sites, to comply with the Benthic Guidelines at maximum feed levels for at least three years before any more space is considered. [consistent with BOI Condition of Consent 44a]</li><li>• This especially applies to Tio Point, which would be the fourth salmon farm in close proximity in Tory Channel.</li><li>• In the meantime reduce the feed and stocking rates at the low flow sites to meet the Benthic Guidelines.</li></ul>



<p>3. Nitrogen pollution</p>	<ul style="list-style-type: none"> <li>• We dispute the accuracy of Minister's statement: "This proposal is about making better use of existing aquaculture space. There is no proposed increase in the total surface structure area used for salmon farming in the Marlborough Sounds," – Nathan Guy, Minister of Aquaculture.</li> <li>• The proposed relocation sites are not "existing aquaculture space". They are <b>prohibited</b> to aquaculture.</li> <li>• While farm surface area may remain about the same, there is a proposed five-fold increase in fish feed to 24,600T a year.</li> <li>• With more feed and more fish, the amount of nitrogen pollution discharged into the Sounds through salmon faeces would also increase. The high-flow farms would be discharging the equivalent of the nitrogen in sewage from a city the size of Christchurch, straight into the sea.<sup>1</sup></li> <li>• Residents must meet strict obligations to keep waste out of the enclosed waters of the Sounds. Yet this proposal would allow the untreated discharge of polluting nutrients from six new salmon farms.</li> <li>• As a land-based comparison of low flow and high flow sites, it is not OK for a dairy farmer who has been pulled up for discharging effluent into a small stream to resolve the issue by increasing his herd and discharging to a faster river.</li> </ul>
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	<p>Norway.</p> <ul style="list-style-type: none"> <li>• Offshore alternatives are barely mentioned in this proposal. 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.</li> <li>• Rather than pushing this relocation proposal for areas prohibited to aquaculture, MPI and the industry should invest in research to expedite offshore farming as a future-proofed alternative.</li> </ul>
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## Written Comment No:0487

	process. Instead they have joined forces and put forward this relocation proposal for FIVE more farms in the Waitata Reach. None of these farms can be justified.
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### **Further comment:**

**As a resident of Totaranui/Queen Charlotte Sound I am especially concerned about the quality of the Sounds environment, its water, natural fish stock, and tourist appeal (clean, green image!) What we need are more reserves not more salmon farms, therefore I endorse the conclusion below.**

### **In conclusion:**

There should be no discussion of more salmon farms in the Marlborough Sounds until NZ King Salmon shows it can operate the ones it has within the agreed benthic guidelines.

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

# Written Comment No: 0553

Salmon Farm Relocation

Ministry for Primary Industries

Private Bag 14

Port Nelson

aquaculture.submissions@mpi.govt.nz

To: The Salmon Relocation Advisory Panel

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

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

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

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

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

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

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

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

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

Name: Allan Polglase

Organisation/Company:

Role: Diver (contractor)

Email:

Phone:

Date: 21/03/2017

Subject	Proposed relocation of King Salmon Farms March 2017
From	Rob Pooley
To	aquaculture submissions
Cc	Rob Pooley; Simon Pooley; Jeremy Pooley; [REDACTED]
Sent	Monday, 27 March 2017 4:46 p.m.

27 March 16:45

To Whom it may concern  
Aquaculture Unit  
MPI  
NZ Govt

**I wish to submit to on the proposed relocation of the King Salmon farms.**

**I make this submission as a private Individual and wish to stress that please**

**I oppose the proposed relocation of the Salmon farms**

1. My name is Rob Pooley, I am a second generation mussel farmer. I and my family have been involved in mussel farming since the late 70's. We invested in 1977, moved to Elaine Bay in 1980 and invested in the local community. My two sons who are both actively involved in mussel farming were raised in the Sounds. Today they and their young families are dependent on mussel farming for their living. Both sons have equity in mussel farming and property to support it in Elaine Bay.
2. Elaine Bay is the recognised outer Sounds service port not only for mussels but also general cargo.
3. The Pooley family using the family business Just Mussels Ltd have been growing mussels for 35 years, currently producing circa 2000t. We have mussel farms located in various areas in the Sounds
4. We have owned, part owned, share farmed, managed or simply provided services for hundreds of mussel farms and Salmon farms in our long association with the industry
5. We are passionate advocates of all aspects of aquaculture and respect the effort and rights of our peers. Aquaculture is already proven to be the future of Seafood globally.
6. **Environment** - we have a strong empathy with the Sounds environment and pride ourselves in being responsible users and sharers of the coastal areas we farm and live near.
7. **Planning Integrity** - Personally I have born witness to, and been a part of, every planning regime since the mid 70's. I wish to place on record my enduring support for the integrity and intent of the Marlborough Sounds Marine Planning Scheme (MSMPS), the legislation used to manage marine farming in the 70's and 80'. In every sense it was a robust, transparent, respectful and useful tool to provide for aquaculture. Its provisions included prohibiting marine farming adjacent to reserves, in front of houses, too close to existing farms, within 150m of headlands, in any mail boat routes, and any other site of significance.
8. **RMA** – by contrast the RMA has, in my view, been a huge fail; the legal wriggle room created by the two-step process or beyond (High Court), has seen all normal societal considerations thrown out the window in lieu of the property right grab, driven by wealth and greed. The end of years of manipulation and spend has seen a huge amount of water space granted, which would never have been granted, for example, under the MSMPS.
9. **EPA** - whilst seemingly an appropriate tool to provide water space for aquaculture, the outcome of the EPA process is a much higher profile of opposition to and angst about

aquaculture. The process squandered millions of dollars and was seen as huge negative and detrimental process for industry.

10. **360A** - I cannot support the use of 360A; whilst there is no doubt it exists and is there for a reason, I cannot support a regime that is not readily available or affordable to the general player. I feel the proposed relocation of salmon farms under this method is discriminatory and exclusive. Further, I am stunned that the provisions of 360A can be applied to sites which were clearly poorly researched (Crail Bay - reminding ourselves New Zealand Marine Farms, the original publicly floated company sought to establish farms in this bay and failed). I find it difficult to accept that poorly located marine farms can be considered for relocation under 360A at all; the original decision to place them was a commercial one. Are we now going to invite all poor performing mussel farm owners to apply for the same consideration?
11. **Proposed locations** - I was stunned to see the proposed locations. All proposed sites are in breach of the first principles I mention in 7&8 above ie the MSMPS.
12. I marvel at what thinking decided the mid channel farm in the entrance to the Pelorus Sound would be acceptable. The only conclusion I can come to is that it is a "burner" a "throwaway" which actually irks me more; how stupid do people think we are?
13. As for the Horseshoe Bay site, what arrogance to accord the right to apply over the top of any existing farm; what was the thinking behind that?
14. The rest of the sites are near to or on top of existing farms, several are clearly in the time honoured and respected "fairways" or mailboat routes.
15. For these reasons alone I feel the proposal and the process lacks integrity.
16. There is the matter of the rights of IWI to be considered and I have no doubt this will surface.

**In closing I wish to state clearly I am not opposed to Salmon Farming, I have worked alongside and for the Salmon industry since the early 80's.**

**I am however opposed to the principle and process proposed. I remain unconvinced it will deliver fairness with integrity and respect.**

I am not the person to "stack" submissions so please accept this submission on behalf of myself, my family and my businesses.

Above all, you need to be aware this is the view of many a person I have had conversations with there is genuine concern and opposition to this proposal.

I wish to place on record I wish to be heard.

Rob Pooley

- State your name (and if appropriate your occupation and where you live)
- ; • Provide contact details so the written comments can be acknowledged;
- State whether you wish to be heard and, if so, provide contact details (such as email and phone number) so you can easily be contacted about hearing times and dates;

## Written Comment No: 0488

- State whether you support or oppose (in whole or in specific parts) the proposed regulation and plan changes;
- Explain why you take that position (which may include information (evidence) that supports your position);
- Alternatively, you could state you are neutral and you are commenting to bring certain information to the Panel's attention.
- If you intend to have others (such as experts) support your oral presentation please include details of who they are and what they will cover.
- If you wish to speak to your comments, an indication of the amount of time you consider you may need for your oral presentation would be helpful, although actual time granted will depend on the number of others wishing to be heard. 17. The level of detail in your written comments is a decision for you to make

# Written Comment No: 0556

Salmon Farm Relocation

Ministry for Primary Industries

Private Bag 14

Port Nelson

aquaculture.submissions@mpi.govt.nz

To: The Salmon Relocation Advisory Panel

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

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

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

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

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

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

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

Ongoing opportunities for future employment

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

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

Name: Finbar Pope-Bell

Organisation/Company:

Role: River (Contractor).

Email:

Phone:

Date: 21.3.17