

Contents Page: Port - Purves

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
421	Port Marlborough New Zealand Limited	
539	Porter	Antony
9	Poswillo	John
405	Powlesland	Ralph
572	Powlesland	Mary
340	Prasad	David
363	Preece	Mark
462	Printhouse Nelson	
347	Puklowski	Morgan
304	Purves	Sharyn

Written Comment No: 0421

Subject	Port Marlborough Submission - Salmon Farms Relocation Marlborough Sounds
From	Jan Brown
To	aquaculture submissions
Sent	Monday, 27 March 2017 11:28 a.m.
Attachments	<<PMNZ Feedback on the Potential Relocation of Salmon Farms in the Marlborough Sounds.pdf>>

Hello

Please find attached Port Marlborough New Zealand's submission on the Potential Relocation of Salmon Farms in the Marlborough Sounds.

Jan Brown Office Manager

Port Marlborough New Zealand Limited

PO Box 111 Picton 7250 – 14 Auckland St Picton 7220 New Zealand

www.portmarlborough.co.nz

Notice of Confidential Information This email contains information which is confidential information and which is the property of Port Marlborough New Zealand Limited and its affiliates. If you are not the intended recipient of this email you may not use, review or disseminate, distribute or copy this information. If you have received this email in error please immediately notify the person named above, and delete the original message. Thank you.

This email has been filtered by SMX. For more information visit smxemail.com



PORT marlborough
NEW ZEALAND LTD

14 Auckland Street, Picton
PO Box 111, Picton 7250, New Zealand
Telephone (03) 520 3399
Facsimile (03) 573 7695
www.portmarlborough.co.nz

27 March 2017

Written Comment No: 0421

Ministry for Primary Industries
PO Box 2526
Wellington 6140

Dear Sir/Madam

RE: Feedback on the Potential Relocation of Salmon Farms in the Marlborough Sounds

Port Marlborough New Zealand Limited (Port Marlborough) welcomes the opportunity to provide feedback on the potential relocation of NZ King Salmon Company Ltd salmon farms in the Marlborough Sounds to the sites recommended by the Ministry for Primary Industries ("MPI").

Contact details for Port Marlborough are:

Name: Ian McNabb, Chief Executive

Address: PO Box 1112
Picton 7250

Phone:

Email:

INTRODUCTION

Port Marlborough operates the Port of Picton at the head of Queen Charlotte Sound where it hosts in excess of 4,000 ship visits per year. The majority of shipping activity consists of inter-island ferry traffic which transits the National Transportation Route through Tory Channel. Tory Channel is a recognised navigational route for a wide variety of craft including smaller cruise vessels, leisure craft from small trailer boats to super yachts, fishing trawlers, and numerous other vessels.

Port Marlborough supports the sustainable utilisation of natural resources for the economic well-being of the community. Consistent with this approach, the Company supports the initiative undertaken by MPI to consider relocation of Kings Salmon's six low-flow farms to more appropriate sites, along with implementation of an adaptive management regime.

Port Marlborough also seeks to ensure safe passage for all vessels navigating Tory Channel and the wider Marlborough Sounds, and has reviewed the six proposed salmon farm relocation sites from the perspective of navigational risk.

COMMENTS ON SITE SUITABILITY

Following review, Port Marlborough is neutral to the location of five of the six sites. The Company opposes the proposed Tio Point site in Tory Channel for the following reasons:

Written Comment No: 0421

- The site is located within the designated National Transportation Route and unduly close to the recognised navigational route through Tory Channel and is likely to increase navigational risk for vessels of all sizes transiting the Channel
- Potential failure of farm structures may result in the farm or farm debris entering the shipping channel a very short time following such failure;
- Relocation to this site has the potential to generate future reverse sensitivities that may adversely impact efficiency of shipping activities through Tory Channel

Proximity to National Transportation Route

The Tio Point Site is situated between Tio Point and Motukina Point, on the southern edge of Tory Channel. Tory Channel is a recognised shipping route and is designated as a *National Transportation Route* within both the operative Marlborough Sounds Resource Management Plan (Attachment 1) and the proposed Marlborough Environment Plan.

The National Transportation Route includes the main inter-island shipping channel through which typically twenty ferry transits occur in any given 24-hour period. Smaller cruise ships, large fishing trawlers, other significant vessels and numerous small craft navigate Tory Channel on an on-going basis.

The Maritime NZ Guidelines for Aquaculture Management Areas and Marine Farms were developed in 2005 to give guidance with respect to navigational safety to marine farm applicants and regional councils considering farm establishment and management, and we look to their intent to inform our comments. Section 5 of the Guidelines considers positional factors for location of Aquaculture Management Areas and placement of marine farms. It recommends that marine farming be kept clear of recognised navigational routes; and that marine farms in inshore areas should not be located within a minimum of 500 metres of a recognised navigational route.

The Navigational Risk Assessment prepared by Navigatus Consulting and included in the consultation material for the relocation proposal makes a number of observations regarding the Tio Point site:

- The Tio Point site is 285 metres from the recognised navigation route. We note that this is barely 50% of the minimum limit recommended by the Maritime NZ Guidelines
- The Tio Point site is closer to the navigation route than any existing farm
- Navigatus have recommended strengthening procedures designed to ensure a suitable separation between work boats and ferries is maintained to manage this potential risk.
- Navigatus also considered the increased risks of interaction at the location where ships within the National Transportation Route turn around the Te Uira-Karapa Point/Motukina Point.

Figure 1 is an extract from the Navigatus Report which depicts the ferry route at this point in Tory Channel. In this pinch-point location, if ships are passing each other as they pass this point, a wider route is taken around Te Uira-Karapa Point. This results in vessels passing closer to the Tio Point farm site to ensure an adequate separation is provided between the passing vessels.

Figure 12: Ferry Paths (red: inbound, green: outbound) at the proposed site of Motukina Point (farm approximate location and size shown)

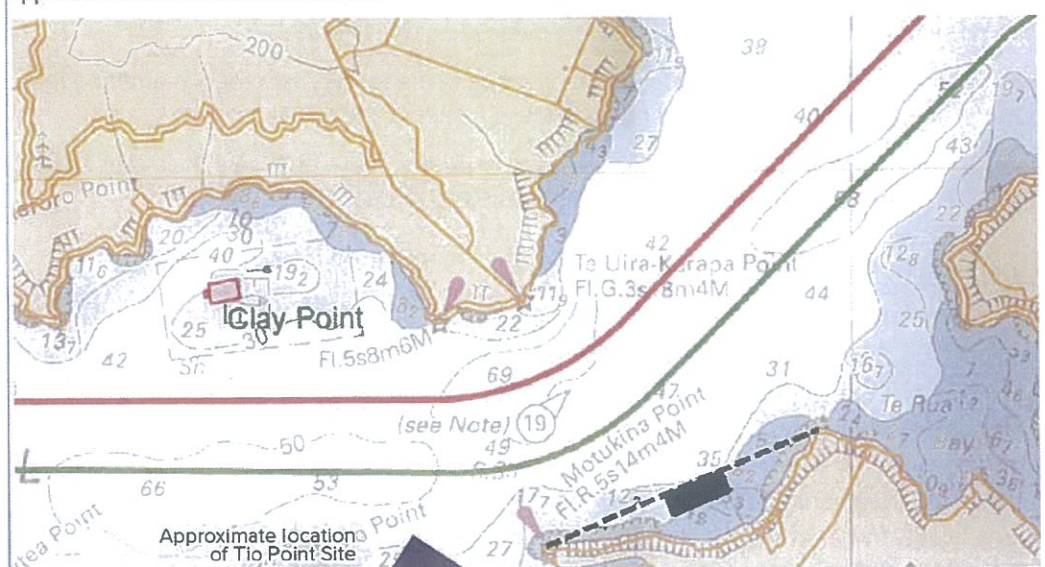


Figure 1

Exert from Navigatus Consulting, Navigation Risk Assessment, Marlborough Sounds Salmon Farms, 14 December 2016, page 27. The location of the Tio Point site has been added to this image. Note that the Motukina Point farm site shown on this figure has not been pursued in the current MPI consultation process.

The Navigatus report recommends that the ferries be programmed not to pass on the turn at the Te Uira-Karapa Point/Motukina Point location in order to avoid this situation. Port Marlborough submits that it is not appropriate to impose additional navigational restrictions on existing inter-island ferry operations in order to accommodate relocation of a commercial salmon farm proximate to the National Transportation Route. Efficient inter-island ferry transportation is an important component of New Zealand's transport and logistics chain. Port Marlborough submits that this activity has a legitimate precedence over potential salmon farm relocation.

Port Marlborough contends that the proposed relocation of a farm to the Tio Point site increases the risk of interaction of the farm and farm activities with ferries and other vessels using the recognised navigation route; and that this increased risk should be avoided by choosing an alternative, more navigationally appropriate site for the farm.

Potential for infrastructure failure / farm debris to enter shipping channel

Port Marlborough is concerned about navigational risks arising from possible farm failure events such as the failure of farm mooring systems, or damage to farm structures that result in part of the structure breaking free. In these situations, the Navigatus report states that the time it would take for debris or structures which have broken free from the Tio Point site to reach the shipping path would be 10 minutes. Alerting vessels transiting Tory Channel within a 10-minute timeframe is likely to be very difficult to achieve, and would rely on the damage being recognised immediately (noting that a significant proportion of inter-island ferry transits occur during hours of darkness).

Floating debris is also a significant risk to small craft navigating Tory Channel, with potential for serious harm accidents in the event of a small craft colliding with farm infrastructure or debris.

Port Marlborough considers that it is appropriate to avoid this increased risk by choosing an alternative more navigationally appropriate site.

Reverse Sensitivity

Port Marlborough is concerned that establishment of a farm at the proposed Tio Point site may result in future exposure of legitimate shipping activity to reverse sensitivity impacts. For example, the presence of a farm at the Tio Point location may in future give rise to heightened concern regarding safe navigation of vessels. A potential result is that the risk may be deemed to be too great for vessels to transit the area, with subsequent prohibition or diversion of vessels from the route thus impairing physical and economic efficiency.

CONCLUSION

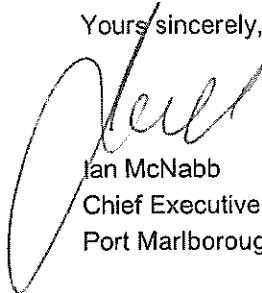
In summary, Port Marlborough supports sustainable use of resources within the Marlborough Sounds to support economic activity. Port Marlborough supports the current process whereby MPI is proposing relocation of unsustainable low-flow salmon farms to higher flow areas, coupled with an adaptive approach to farm management.

Port Marlborough is concerned that the proposed Tio Point farm location will compromise ongoing safe and efficient use of the established National Transportation Route by legitimate shipping activity through Tory Channel, and seeks that the site be declined.

PUBLIC HEARINGS

Port Marlborough wishes to speak to its written submissions at the hearing by the Marlborough Salmon Farm Relocation Advisory Panel.

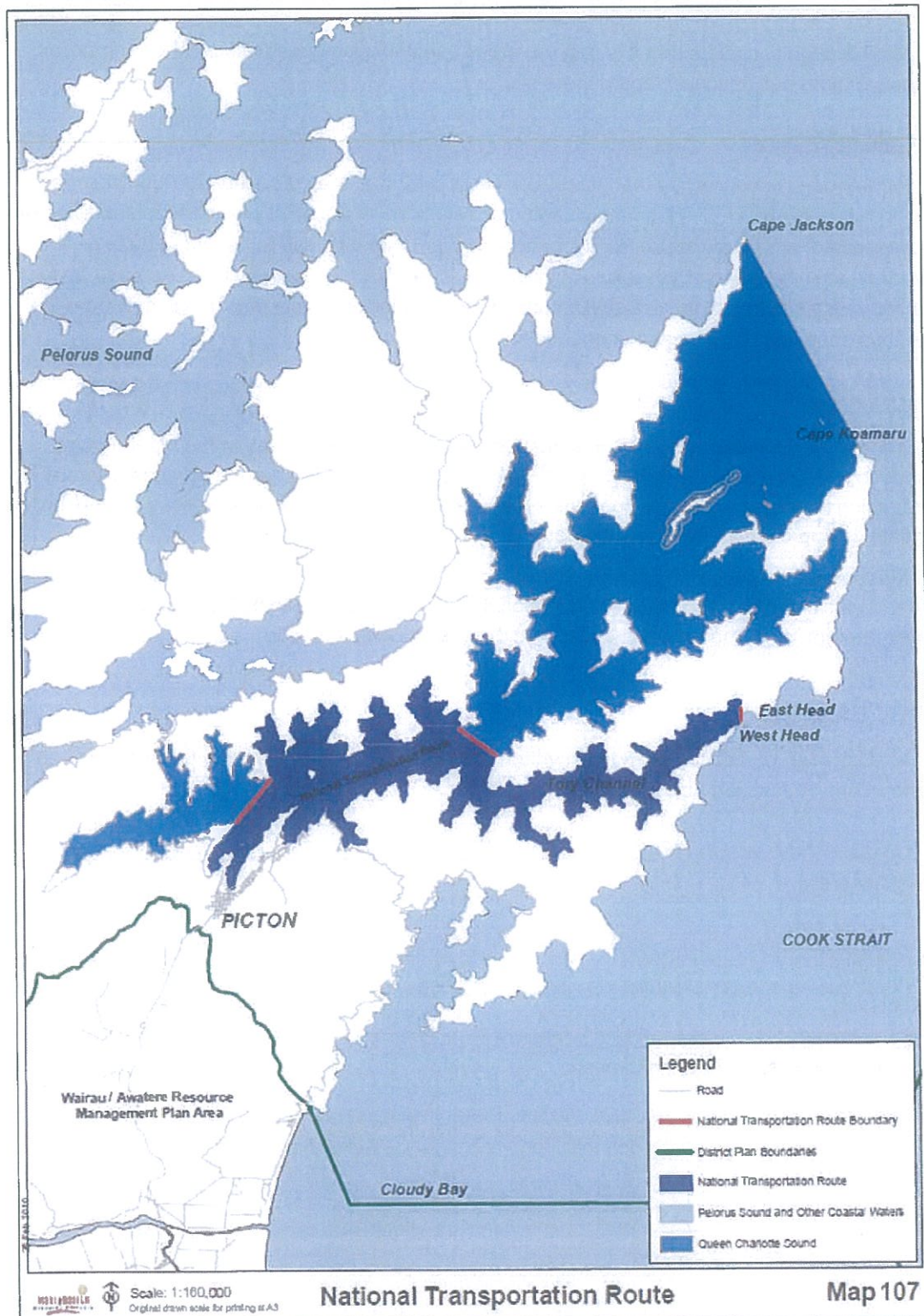
Yours sincerely,



Ian McNabb
Chief Executive
Port Marlborough New Zealand Limited

ATTACHMENT 1

Map 105, Operative Marlborough Sounds Resource Management Plan



Subject	MPI submission - in favour of the Marlborough salmon farm site swap
From	Antony Porter
To	aquaculture submissions
Sent	Monday, 27 March 2017 4:05 p.m.

Dear Advisory Panel

I am writing to you as the Key Account Manager at NZ King Salmon working mostly on the NZ retail side of the business. Salmon in NZ has seen double digit growth in volume for more than 5 years as more and more New Zealanders become aware of the benefits of eating NZ King Salmon. Not only does Regal salmon have a superb flavour but it is packed with omega-3s, protein and other critical nutrients. Consumer trends at the moment are all about healthy living - reducing meat/dairy and increasing vegetable and fish intake. Convenience and taste are also key trends. Regal salmon delivers on all of these consumer trends which are poised to become even more significant and relevant to New Zealanders. Our customers (Foodstuffs and Countdown) and research tell us shoppers are seeking out quality New Zealand seafood.

Countdown was forced to look overseas for salmon due to such high demand and imported containers of frozen Norwegian salmon because the NZ industry couldn't meet their demand. Foodstuffs in-particular has a very strong stance on supplying NZ seafood to their customers. We are hoping to be able to meet the NZ markets demands.

I am proud to work with such a premium NZ product and people that I meet within or out of the industry regularly complement us on what a great product that we have access to. I am based in Auckland and many Aucklanders are not so aware of how salmon is farmed but when they learn about our process and how it comes from the beautiful Marlborough Sounds and the lengths we go to take care of our environment they are inevitably impressed and proud that NZ can be producing some of the finest seafood in the world. We have loads of information on our website about the Marlborough Sounds and our farming process for interested consumers to read (inevitably though the recipes page gets the most hits by far). In conclusion my job is to grow NZ salmon availability within NZ and meet consumer and customer demands, moving the farms to better sites with better environments will enable us to meet the growing demand for salmon locally and makes sense.

Kind Regards

--

Antony Porter, Key Account Manager



[Redacted] | W: www.kingsalmon.co.nz | A: 6 Mitchelson Street, Ellerslie, 1051



ORA KING™

Internet e-Mail Disclaimer: All information in this message and attachments is confidential and may be legally privileged. Only intended recipients are authorised to use it. Views and opinions expressed in this e-mail are those of the sender and do not necessarily reflect the views of the company. E-mail transmissions are not guaranteed to be secure or error free and The New Zealand King Salmon Co Ltd accepts no liability for such errors or omissions.

Salmon Farm Relocation,
Ministry for Primary
Industries,
P.B 14
Port Nelson 7042.

Blenheim
7-2-77.

Our family and extended family
have had a long association with
the Marlborough Sounds, having
holiday homes since the 1940s, until
the present time.

We have taken a close interest in
the development of W2 King Salmon
and the battle they have had trying
to increase their number of farms.

It is very important for New Zealand
that the Government encourage and
make it easier for aquaculture
exports to increase, with the demand
there is for these products.

It is also important that the
environmental impact is reduced
and this can be achieved by moving
these farms to the Port of Nelson.

there is good water flow.

Several more could be put in some of the bays in the Tory Channel area, where they would fit in very well.

The benefits to our N2 Exports should be put well ahead of objections from Macris and the Greens.

The proposal by N2 King Salmon to create a new processing plant in Picton with 30 new jobs and further expansion in the future, is exciting news for Marlborough and the Government should make sure that this can happen quickly and smoothly.

Yours faithfully,

John Posvillo.

Written Comments No: 0405

Subject	Submission re salmon farm expansion in Marlborough Sounds
From	Ralph Powlesland
To	aquaculture submissions
Sent	Monday, 27 March 2017 11:59 AM
Attachments	<<Attachment to submission re MPI and NZKS expansion plans.docx>>

27 March 2017

Ministry for Primary Industries

Port Nelson 7042

Please find attached my submission regarding the proposed use of Section 360A of the RMA to allow an expansion of salmon farming in the Marlborough Sounds.

Yours sincerely

Ralph Powlesland

Written Comments No: 0405

To: Salmon Farm Expansion
Ministry for Primary Industries
Private Bag 14
Port Nelson 7042

Email to:
aquaculture.submissions@mpi.govt.nz

Submission on proposed use of Section 360A of the RMA to allow massive expansion of salmon farming in the Marlborough Sounds.

Name of Submitter in full Ralph Pontesland
Address

Email [REDACTED]

Telephone (day) [REDACTED] Mobile

<input checked="" type="checkbox"/>	I am against the whole Ministry for Primary Industries (MPI) proposal for "Potential Relocation of Salmon Farms in the Marlborough Sounds"
<input type="checkbox"/>	I would like to speak to my written submission at a public hearing in _____
<input type="checkbox"/>	I do not want to speak to my written submission at a public hearing

To the Marlborough Salmon Farm Relocation Advisory Panel and Minister Nathan Guy:

I am writing to express my dismay about Minister Nathan Guy's proposal to overrule the Marlborough District Council's (MDC) plan and allow for up to six new salmon farms in areas prohibited for aquaculture in the Marlborough Sounds.

The MDC's State of the Environment Report 2015 noted that:

- The Marlborough Sounds biodiversity is NOT in good shape.
- The issues include: fewer fish, not as many species, serious loss of biogenic habitats, sedimentation in estuaries and biosecurity incursions.

The Marlborough Sounds needs proposals for protection and restoration of its natural environment and marine ecosystem, **NOT** proposals for further exploitation and degradation such as this one. It is submitted that the aim of this MPI proposal, thinly disguised as salmon-farming relocation, is in fact a proposal for the massive expansion of salmon farming in the Waitata Reach area of the Pelorus Sound.

If successful it will mean a cluster of 7 farms in Waitata Reach. It will mean 2 to 3 times more waste discharge spread over a wider benthic footprint. It will mean greater adverse cumulative impacts on the water column.

The Marlborough Sounds needs, we submit, more extensive Marine Reserves, **NOT** more Salmon Farms on an industrial scale as is now proposed by MPI and New Zealand King Salmon (NZKS).

Written Comments No: 0405

The Board of Inquiry drew the limits

In 2012 NZKS applied for nine new salmon farms in areas prohibited for salmon farming via a Board of Inquiry process. They were ultimately allowed three farms. The Board of Inquiry, and then the Supreme Court, made a number of very important findings, which, it is submitted; this proposal is attempting to ride rough shod over.

It is submitted that this is a blatant attempt to try and achieve for NZKS what it failed to get last time around. This time it is being done under the cloak of a relocation scheme. It is submitted that this is a relocation is factually wrong. Two of the salmon farms to be "relocated" do not in fact exist – there has been no salmon farming on the sites for at least five years.

Once again, MPI and NZKS are trying to put new salmon farm sites into outstanding natural landscapes and, it is submitted, ignoring the legal requirements of the New Zealand Coastal Policy Statement and the adverse cumulative impacts on the this iconic landscape.

This proposal, we submit, ignores the Board of Inquiry finding a threshold limit of two new farms in the Waitata Reach and that the Environment Court subsequently echoed this.

The best Place for Salmon Farming?

The existing NZKS operations are suffering from regular (4 in the last 5 years) unusual mortality events. There is a Controlled Area Notice under the Biosecurity Act in place as a result. Pathogens new to NZ have been discovered in the dead salmon.

We submit that the science shows that 17 degrees Celsius is the maximum sustainable temperature for salmon farming, above this trigger the fish become stressed and vulnerable to disease. MDC records show that the Waitata Reach of the Pelorus Sound has summer seawater temperatures exceeding 17 degrees for long periods. These adverse environmental factors combined with poor management practices is, we submit, demonstrated by these regular significant salmon mortality events.

Instead of allocating clean unspoiled water space for new farms and closing old farms, real pressure should be put on NZKS to operate these existing farms in accordance with Best Management Practice Guidelines. It can be done we submit.

Rather, MPI and NZKS seem to be arguing that the prospect of more jobs and profit justifies ignoring adverse cumulative environmental effects in this iconic public space. This so called MPI report is, we submit, paid for by NZKS using an expert who has a history of working for that company. A truly independent review of this report will, like last time, we submit, show these claims are greatly inflated.

This approach quite wrongly, we submit, gives no credence to the adverse impacts on; endangered species such as the King Shag, recreational users, navigation issues, tourism, and struggling nearby scallop beds.

Other objections:

See attachment.

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

Page 2.

Attachment to submission on proposed use of Section 360A of the RMA to allow the relocation and expansion of salmon farming by New Zealand King Salmon in the Marlborough Sounds

Submitter: Ralph Powlesland

A few years ago Ministry for Primary Industries (MPI) was asked to find aquaculture space in the Marlborough Sounds in order to assist with settling a Maori Waitangi Treaty claim. MPI was unable to find suitable available aquaculture space at the time. The treaty claimants were forced to accept a financial payment in exchange. However, now MPI and the National Government have been able to find aquaculture space for New Zealand King Salmon (NZKS) in the Marlborough Sounds. What has changed? Nothing seems to have changed, except that now the National Government and MPI have decided to disregard the wishes of the Marlborough Sounds community and the Marlborough District Council, and offer sites to NZKS that are in areas prohibited for aquaculture. The aquaculture prohibited areas were designated as such after much consultation between MDC and community stakeholders. The National Government is now willing to over-rule the decisions of the community in order to pander to the wishes of a largely overseas-owned aquaculture business. NZKS has been shown to have no regard for the impacts of their operations on the natural environment, or for the regulations of operating salmon farms according to agreed Best Practice Management Guidelines.

The areas proposed for the new salmon farms are within much of the foraging range of the Nationally Endangered New Zealand king shag. This species is endemic to the Marlborough Sounds – it is found nowhere else. Also, it has a small population, numbering about 800 birds. Given its restricted distribution and small population size, a single adverse event, such as a toxic algal bloom, could impact much of the population. All preferred prey items of this shag are bottom-dwelling fish species. Thus the salmon-farming proposal in Waitata Reach could well bring about a loss of these benthic fish populations by contamination of the benthic substrate as a result a salmon faeces and uneaten food pellets accumulating on the seabed below and near the proposed salmon farms. Thus there is a high degree of risk to the king shag population of establishing salmon farms in the Waitata Reach area.

Written Comment No: 0572

Subject	Submission on the Potential Relocation of Salmon Farms in the Marlborough Sounds
From	<u>Mary Powlesland</u>
To	aquaculture submissions
Sent	Monday, 27 March 2017 3:27 p.m.
Attachments	<<Submission on the Potential Relocation of Salmon Farms in the Marlborough Sounds.pdf>>

Submission on the Potential Relocation of Salmon Farms in the Marlborough Sounds

Submitter: Mary Powlesland

Address: [REDACTED] Pelorus Sound, Marlborough

Email: [REDACTED]

Phone: [REDACTED]

I oppose the entire proposal to “potentially” relocate salmon farms in the Marlborough Sounds.

I do not wish to speak to my written submission at a public hearing.

1. NZ King Salmon (NZKS) in 2012 applied for consent for nine new salmon farms in areas prohibited for salmon farming. There was a process involving a board of inquiry and then the Environment Court which resulted in NZKS being allowed three farms. This new proposal attempts to bypass the Environment Court decision and double the number of farms allowed. I think the previous decision should be upheld.
2. The Marlborough District Council (MDC) has found that the Marlborough Sounds biodiversity is not in good shape in terms of fish numbers, species diversity, habitat loss, sedimentation & biosecurity incursions. Adding new, larger salmon farms is likely to make the situation worse.
3. It seems that the existing salmon farms have degraded the environment to the point where they are no longer viable. Two of the sites are no longer used and there are regular mortality events at others. So now NZKS want to ‘relocate’ to fresh sites, but there is little evidence that these will fare any better in the long term. The water flow is higher at the new sites so it may take longer for the wastes to build up around the farm site, but that is because it will be washed away (probably into the inner Sounds) where it can be someone else’s problem.
4. There is mention of monitoring and enforcement, to be done by MDC. In my experience, MDC are not good at monitoring and enforcement. For example, the mussel spat farm at Clova Bay is supposed to supply annual reports but never has and MDC has not chased them up.
5. Benthic best management practice could be implemented for the existing salmon farms. It is not necessary to create new ones. Or it could be implemented at the three new farms that were allowed following the 2012 application. Then when it has been proved that the practices lead to ‘reduced environmental effects’ maybe extra sites could be added. At that stage there would be better information for deciding what sites are suitable.
6. Given that NZKS is more than 50% foreign-owned, it is not of national significance to help them bypass previous decisions of the Environment Court.
7. The new jobs that *may* be created are not a good enough excuse to justify a proposal that will degrade the Marlborough Sounds environment. It would be better to create jobs in genuinely sustainable industries that aren’t going to harm the environment. So I don’t consider the proposal to be of regional significance. The Marlborough Sounds Management Resource Plan should not be amended.

Written Comment No: 0572

8. When local iwi wanted new sites for salmon farming, no suitable sites were available. Now that NZKS wants new sites, suddenly there are suitable ones. If there are to be new sites, they should be offered to iwi first.
9. The Waitata Mid-channel site seems particularly unsuitable as it is a navigational hazard. Larger ships may have problems using the channel.
10. The effect on the nationally endangered King Shag is not seen as great as they supposedly don't forage at the depth of the farms. However, it is possible that environmental degradation could reduce the numbers of their food species. It could be hard to implement a recovery plan for this scenario. This is too great a risk to take with such an endangered bird species.

Written Comments No: 0340

Subject	Salmon submission
From	<u>David Prasad</u>
To	aquaculture submissions
Sent	Monday, 27 March 2017 1:10 PM
Attachments	<<New Doc 2017-03-27.pdf>>

I am against shifting farms as it is going to interfere my fishing spots.

Leave the farms where they are and just manage it better.

David Prasad

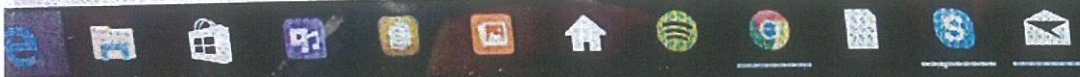
Phone. [REDACTED]

**Submission on proposed use of Section 360A of the RMA
to allow massive expansion of salmon farming in the Marlborough Sounds**

Name of Submitter in full			
Address			
Email			
Telephone (day)		Mobile	

<input checked="" type="checkbox"/>	I am against the whole Ministry for Primary Industries (MPI) proposal for "Potential Relocation of Salmon Farms in the Marlborough Sounds"
<input type="checkbox"/>	I would like to speak to my written submission at a public hearing in <input type="text"/>
<input type="checkbox"/>	I do not want to speak to my written submission at a public hearing

To the Marlborough Salmon Farm Relocation Advisory Panel and Minister Nathan Guy:



To the Marlborough Salmon Farm Relocation Advisory Panel and Minister Nathan Guy:

I am writing to express my dismay about Minister Nathan Guy's proposal to overrule the Marlborough District Council's (MDC) plan and allow for up to six new salmon farms in areas prohibited for aquaculture in the Marlborough Sounds.

The MDC's State of the Environment Report 2015 noted that:

- The Marlborough Sounds biodiversity is NOT in good shape.
- The issues include: fewer fish, not as many species, serious loss of biogenic habitats, sedimentation in estuaries and biosecurity incursions.

The Marlborough Sounds needs proposals for protection and restoration of its natural environment and marine ecosystem, **NOT** proposals for further exploitation and degradation such as this one.

It is submitted that the aim of this MPI proposal, thinly disguised as salmon-farming relocation, is in fact a proposal for the massive expansion of salmon farming in the Waitata Reach area of the Pelorus Sound.

If successful it will mean a cluster of 7 farms in Waitata Reach. It will mean 2 to 3 times more waste discharge spread over a wider benthic footprint. It will mean greater adverse cumulative impacts on the water column.

The Marlborough Sounds needs, we submit, more extensive Marine Reserves, **NOT** more Salmon Farms on an industrial scale as is now proposed by MPI and New Zealand King Salmon (NZKS).

The Board of Inquiry drew the limits

In 2012 NZKS applied for nine new salmon farms in areas prohibited for salmon farming via a Board of Inquiry process. They were ultimately allowed three farms. The Board of Inquiry, and then the Supreme Court, made a number of very important findings, which, it is submitted; this proposal is attempting to ride rough shod over.

It is submitted that this is a blatant attempt to try and achieve for NZKS what it failed to get last time around. This time it is being done under the cloak of a relocation scheme. It is submitted that this is a relocation is factually wrong. Two of the salmon farms to be "relocated" do not in fact exist – there has been no salmon farming on the sites for at least five years.

Once again, MPI and NZKS are trying to put new salmon farm sites into outstanding natural landscapes and, it is submitted, ignoring the legal requirements of the New Zealand Coastal Policy Statement and the adverse cumulative impacts on the this iconic landscape.

This proposal, we submit, ignores the Board of Inquiry finding a threshold limit of two new farms in the Waitata Reach and that the Environment Court subsequently echoed this.

Written Comments No: 0340

The existing NZKS operations are suffering from regular (4 in the last 5 years) unusual mortality events. There is a Controlled Area Notice under the Biosecurity Act in place as a result. Pathogens new to NZ have been discovered in the dead salmon.

We submit that the science shows that 17 degrees Celsius is the maximum sustainable temperature for salmon farming, above this trigger the fish become stressed and vulnerable to disease. MDC records show that the Waitata Reach of the Pelorus Sound has summer seawater temperatures exceeding 17 degrees for long periods. These adverse environmental factors combined with poor management practices is, we submit, demonstrated by these regular significant salmon mortality events.

Instead of allocating clean unspoiled water space for new farms and closing old farms, real pressure should be put on NZKS to operate these existing farms in accordance with Best Management Practice Guidelines. It can be done we submit.

Rather, MPI and NZKS seem to be arguing that the prospect of more jobs and profit justifies ignoring adverse cumulative environmental effects in this iconic public space. This so called MPI report is, we submit, paid for by NZKS using an expert who has a history of working for that company. A truly independent review of this report will, like last time, we submit, show these claims are greatly inflated.

This approach quite wrongly, we submit, gives no credence to the adverse impacts on: endangered species such as the King Shag, recreational users, navigation issues, tourism, and struggling nearby scallop beds.

Other Comments:

Written Comment No: 0363

Subject	Aquaculture submission
From	Mark Preece
To	aquaculture.submissions@mpi.govt.nz
Sent	Monday, 27 March 2017 9:58 PM
Attachments	<<17_03_25 Submission on MPI site relocation plans.pdf>>

Dear sir

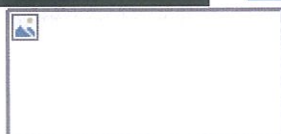
Please see attached my submission.

Regards

Mark Preece



W: www.kingsalmon.co.nz | A: 43 Dublin Street, Picton 7220



ORAKINGTM

Internet e-Mail Disclaimer: All information in this message and attachments is confidential and may be legally privileged. Only intended recipients are authorised to use it. Views and opinions expressed in this e-mail are those of the sender and do not necessarily reflect the views of the company. E-mail transmissions are not guaranteed to be secure or error free and The New Zealand King Salmon Co Ltd accepts no liability for such errors or omissions.

Written Comment No: 0363

Introduction

Ko Rongomaiwhenua ta lariki rapuna
Ko Rangimata tā waka
Ko Hakepa ta maunga
Ko Rangihau te rāua ko Rēkohu ka motu
Ko Kōpinga ta Marae
Ko Moriori ta imi kakano
Ko Mark Preece toku inoa
No reira hokomenetai me rongo

1. My full name is Mark Anthony Preece. I have been employed by New Zealand King Salmon since 1994, a total of 23 years, of which 19 have been in a management capacity
2. My first introduction to New Zealand King Salmon was as a shift worker at the Forsyth and Waihinu farms, later being promoted to a supervisor at the Otanerau and Ruakaka farms (1994 – 1997) before turning to work as a farm manager at Forsyth and Ruakaka farms (1998 – 2000) and then seafarms operations manager (2000 – 2010). As a result of this experience I have a good overview of farming operations from a practical “hands on” and management perspective. I have worked in all parts of NZ King Salmon’s operations as a general hand, participating in tasks such as net cleaning, fish handling, harvesting and fish health. I have worked on both low flow and high flow sites
3. I was awarded the “National Conservator of the Year” award in 1989, an award, at the time, administered by the Department of Conservation
4. I studied Marine Science at the University of Otago where I gained a Masters of Science. I also hold a Graduate Diploma in Business Studies from Massey University and am currently sitting for a Master of Manufacturing Leadership
5. I am an OSH registered commercial diver (>500 logged commercial dives) as well as a recreational diver for scallops and crayfish. I hold a Maritime New Zealand Commercial Launchmaster Certificate, which enables me to skipper any vessel up to 24m within the inshore limits of New Zealand
6. I am a keen and experienced kayaker and have completed some significant coastal journeys around New Zealand
7. I am available to answer questions if required and would welcome the opportunity to talk to my submission

The proposed relocation

1. I have read MPI's summary document "Potential relocation of salmon farms in the Marlborough Sounds" and most of the supporting documentation
2. All modern farming systems have an environmental impact¹. There are increasing pressures on wild fish stocks. Aquaculture needs to be a substitute for wild fisheries in order for the need for fish protein to be met
3. It can be argued that King salmon is one of the most efficient domesticated animals, as 100kg of dry feed yields about 30kg of King salmon fillets. This may be compared to poultry and pork fillets, where 100kg of dry feed yields only 20kg and 12kg of fillets respectively²
4. It is worthwhile comparing the production yields of different forms of agricultural meat production – compared to terrestrial animals, King salmon are very efficient in retaining protein and energy. The reproductive capacity is huge, and the resources used to produce juveniles are insignificant compared to poultry and pigs. They do not require energy for maintaining a constant body temperature. They live in an aquatic environment, where excretion of ammonia, in addition to urea, lowers the energetic cost of metabolising amino acids. Furthermore, fish are practically weightless in the water and do not expend energy for carrying their body weight where opposing gravity. A weightless animal does not need a strong heavy skeleton
5. King salmon has significantly more harvest yield than terrestrial animals such as pigs, chickens and lamb. 70% of a King salmon can be eaten compared with approximately half or less of the terrestrial animals listed. While King salmon converts feed less efficiently than Atlantic salmon, it is similar to chickens and better than pigs or lamb. It retains more energy in the edible parts of the fish than the terrestrial animals listed³

¹ Diana J.S. Aquaculture Production and Bio-diversity Conservation *Bioscience*, 59: 27-38 (2009).

² Sustainability in Atlantic Salmon Aquaculture. *Norsk Fiskeoppdrett* (2010).

	King Salmon (<i>Oncorhynchus tshawytscha</i>)	Atlantic salmon (<i>Salmo salar</i>) ²	Pig (<i>Sus scrofa</i>)	Chicken (<i>Gallus gallus</i>)	Lamb (<i>Ovis aries</i>)
Harvest yield (%) ^a	88	86.0	72.5	65.6	46.9
Edible yield (%) ^b	70	69.3	52.1	46.1	38.2
Feed conversion ratio ^c	1.80	1.5	2.63	1.79	6.3
Energy retention (%) ^d	23	23	14	10	5

^a Harvest yield is yield of gutted and bled animal. King salmon lose 2% of their weight in bleeding.

^b Edible yield is the ratio of total body weight that is normally eaten, muscle, body adipose tissue and liver, lung and heart for pig. Skin is excluded for all animals

^c FCR = (kg feed fed) / (kg weight body gain)

^d Energy retention = (energy in edible parts) / (gross energy fed)

Written Comment No: 0363

6. The carbon footprint also indicates the environmental efficiency of fish farming. While there are no specific studies conducted on NZ King salmon, it could be similar to Atlantic salmon's footprint. Farmed Atlantic salmon has a carbon footprint of 2.9kg CO₂ equivalent per kg of edible salmon⁴, similar to chicken⁵. That is compared to New Zealand lamb of 19kg CO₂ equivalent per kg⁶
7. What this information tells us is that growing fish is more efficient than terrestrial farming. Indeed, farmed beef uses 60% of the world's arable land to produce a mere 2% of the calories people consume in the world⁷. If New Zealand makes a shift from farming terrestrial animals to farming fish we become part of the solution to feeding tomorrow's world
8. New Zealand is in an enviable position whereby we are the largest producer of King salmon. Combined with the food safety story of New Zealand food, smart breeding and branding, our unique offering creates high value export earnings for New Zealand
9. I am in support of relocating the low flow sites to high flow sites in order to:
 - a. Increase the distance between the salmon farms and their neighbours (as discussed in the proposal)
 - b. Improve the environment for the salmon (which lessens the probability of a mortalities)
 - c. Bring high paying jobs to New Zealanders mainly focussed in the Nelson and Marlborough region
 - d. Increase the volume of salmon able to be produced by the NZ salmon industry, while covering a small infrastructural footprint and operating within the Marlborough District Council's Salmon farming Best Management Guidelines
 - e. NZ King Salmon's business strategy aligns with high value exports which is positive for the New Zealand economy
10. My preferred order of relocation is: Crail Bay licences (32 then 48), Waihinau, Forsyth, Otanerau then Ruakaka. My reasons for the first four sites are due to the warmer

From NZ King Salmon data and Bjorkli, J. Protein og energiregnskap hos laks, kylling, gris og lam [Protein and energy account in salmon, chicken, pig and lamb]. M.Sc, Thesis, Norwegian University of Life Sciences (UMB), Norway (2002).

⁴ Winther U. & Ziegler F. *Carbon Footprint and Energy Use of Norwegian Seafood Products*. Trondheim: SINTEF Fisheries and Aquaculture. Report No SFH80 A096068 (2009).

⁵ Cederberg, C. Sonesson, U. Greenhouse gas emissions from Swedish production of meat, milk and eggs 1990 and 2005. Goteborg: The Swedish Institute for Food and Biotechnology. Report No. SR 793. (2009).

⁶ www.agresearch.co.nz/our-science/land-environment/environmental-footprinting/docs/A%20Greenhouse%20Gas%20Footprint%20Study%20for%20Exported%20NZ%20Lamb.pdf

⁷ *Livestock's Long Shadow – Environmental Issues and Options*. Food and Agriculture Organisation. ISBN 92-5-105571-8 (2006).

Written Comment No: 0363

temperatures. I rank the Otanerau and Ruakaka sites last because they can both operate in tandem with the cooler Tory Channel sites and Ruakaka could add to the tourism amenity of the Queen Charlotte Sound

11. If the Ruakaka site cannot be relocated, then its zone should be altered to permit marine farming to enable the resource consent to be renewed in 2021. As a working salmon farm, the site could provide a point of interest for tourism in the Queen Charlotte Sound – even a floating restaurant. With a re-design of the super structure, I believe it could add to the tourism amenity in the Queen Charlotte Sound
12. I would like to ensure the proposed farms take into account the natural landscape character of the outer Pelorus Sounds. Views important to me are the Pelorus Sound views from a vessel when looking seaward towards Cook Strait and the panoramic view from the gun emplacement situated on Post Office Point. I believe that the salmon farms can minimise visual impacts through design and use of recessive colours
13. I believe that the environmental monitoring as laid out in the supporting documents will ensure that the natural flora and fauna are unaffected and settlement of juvenile fish and shellfish are maintained at current levels. I believe sites in the Tory Channel should monitor abalone larvae settlement to ensure recruitment is not affected by salmon farming activities
14. Due to the increased aerobic capacity of the proposed relocated sites, I believe that the environment is better able to assimilate the faecal material from the salmon farms
15. I agree with the surface structure area as per the proposed relocation plan
16. I agree with the staged adaptive management approach to salmon farm, and believe any increases (assuming compliance with resource consents) should be larger. If the conditions of the resource consents are not met, I would expect a similar operational change to produce the desired effect the following year. Cawthron monitoring studies have demonstrated the ability of the marine environment to adapt to increasing and decreasing salmon food discharge
17. In my experience salmon farms sited in higher flow areas pose no greater risk to marine mammals than those sited in low flow areas
18. I believe the proposed relocation will improve fish health and welfare. I believe MPI should consider more bio-secure areas to permit industry to enable single year class fallowing and to fallow sites effectively should a disease situation occur
19. To assist safe navigation the infrastructure should be lit (as required by the Marlborough District Council), and the material used to construct the farm should reflect RADAR

Written Comment No: 0363

appropriately. If the material is not RADAR reflective, then active RADAR reflectors should be used. Land Information NZ should update marine charts appropriately

20. The mid-channel site could be fitted with an automatic identification system (AIS) to assist cruise ship and super yacht navigation (in my experience all vessels this size are fitted with the ability to monitor AIS)

Conclusions

21. I support the relocation of the six low flow site salmon farms
22. I believe the proposal will add high paying, skilled jobs for New Zealanders to the Nelson and Marlborough region, improve tourism opportunities, re-site salmon farms away from affected neighbours and increase the volume of salmon grown
23. I believe that the affects of natural landscape and environmental impacts can all be monitored and managed as per the proposal
24. I believe that the New Zealand economy will benefit from the high value, branded proposition NZ King Salmon offers



Mark Anthony Preece

25 March, 2017

Written Comments No: 0462

Subject	Salmon Advisory Panel
From	Tony Cook
To	aquaculture submissions
Sent	Monday, 27 March 2017 8:55 a.m.
Attachments	<<CCE03252017.pdf>>

Hi Please find, attached Support form.

Kind Regards
Tony Cook
SALES MANAGER

Printhouse Nelson Ltd | 16 Tokomaru Place | Wakatu Estate | PO Box 437 |
Nelson | Phone [REDACTED] | Fax [REDACTED] | Cell [REDACTED]
| www.printhouse.co.nz

Any opinions in this email and any attachments do not necessarily reflect the views of Printhouse Nelson 2003 Ltd. If you are not the intended recipient, you should notify the sender immediately by return e-mail and delete this message from your system. Making improper use of the information contained in this email is prohibited and may expose you to legal challenge or penalties.

Written Comments No: 0462

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?

NZ King Salmon are one of our largest & most valuable clients
Coastal Marine Farming is clearly one of the most logical methods
of food production in the future

As Aquaculture has become developed it seems obvious
from the research presented that optimal farm location
is absolutely key to delivering the best social,
environmental & economic results.

To not do this would seem detrimental to our company

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:

Tony Worrell

Organisation/Company:

Printhside Nelson

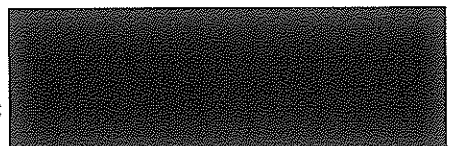
Role:

General Manager

Email:

Phone:

Date:



25.3.2017

Written Comment No: 0347

Subject	Submission - Relocation of NZ King Salmon Farms
From	<u>Morgan Puklowski</u>
To	aquaculture submissions
Sent	Monday, 27 March 2017 12:44 p.m.
Attachments	<<Relocation of New Zealand King Salmon Farms Position.docx>>

Morgan Puklowski

Relocation of New Zealand King Salmon Farms Position –
Morgan Puklowski

I am a second-year degree student studying a Bachelor of Aquaculture and marine conservation. Over the past year multiple studies have been focused on the operations, management, conditions of resource consents, Benthic Guidelines and environmental effects of numerous New Zealand King Salmon farms throughout the Marlborough Sounds region. As being passionate about the environment my belief is that my opinion should be based around the facts of environmental effects first, while still equally considering those of social and economic, as these three categories hold the principles for sustainability, which is in my mind is the main goal of any anthropogenic venture.

Initial Position

Overall this submission is inclining to favour the proposal to regulate under section 360A of the Resource Management Act 1991 to enable the relocation of up to six existing salmon farms under the operation of New Zealand King Salmon.

Background Understanding

Through the anthropogenic activities of salmon farming the aquatic and benthic environment is being negatively impacted in some of the localised areas beneath farms at low flow sites in the Marlborough Sounds. At certain stocking and feeding levels the low flow does not disperse waste effectively instead it allows for high deposition right under the farms leading to the natural environment and organisms that reside on and in the benthic layer to not effectively remediate the amount of fish excretion and small levels of uneaten food that is being deposited. This increases the amount of organic matter, enrichment of the sea floor, and “enrichment tolerant species”. This however decreases redox, species richness and Shannon-Diversity (H) (species diversity/abundance). Deposition of waste and the level of enrichment is increased through higher production, higher feeding

Written Comment No: 0347

levels and low flow areas. A high flow site has a higher potential of diffusing, dispersing and dissolving the same amount of waste from a low flow site, at a rate that reduces localised deposition, enabling natural bioremediation to occur and lower levels of enrichment.

Benthic Issues

The benthic environment in the localised farm areas of Ruakaka Bay, Otanerau, Forsyth Bay, Waihinu Bay and Crail Bay (not stocked since 2011) are over the maximum levels of benthic enrichment (ES5) which does not comply with the voluntary implementation of the Benthic Guidelines, forcing mitigation methods. With the current technology, the options available are to reduce stocking and associated feed levels or farm relocation. The option to reduce stock and feed would cause economic and social effects. Under minimum and maximum feed and stocking levels, developed by Cawthron, the minimum feed level scenario would see all four operational sites to no longer be commercially viable, “an estimated ongoing loss of \$10 million GDP and 105 FTEs less than currently”. Under the maximum feed level scenario three of the four operational site would still be viable but would estimate “to result in an ongoing economic impact of \$3.6 million GDP and loss of 38 FTEs”. For the non-commercially viable farms, destocking and fallowing would occur for two to five years for the sea bed to recover. When stocking recommences farms will still face the same problems as of current, with localised benthic enrichment, low stocking levels to comply with Benthic Guideline standards, low flow, and temperature and dissolved oxygen fluctuation. Overall leading to economic and social loss, and minor benthic environmental improvements. This is shown with the Crail Bay farms, not stocked since 2011 but still they are not expected to comply with the benthic standards. Indicating that only destocking a site for a couple of years (Crail Bay – six years) may not remediate the problem of benthic enrichment.

A consent for the proposal to move farms from low flow sites to high flow sites would give the opportunity to implement the Benthic Guideline standards as well as focus on incorporating these standards into resource consent conditions. By doing so these farms would operate under higher resource consent standards than that of their current resource consent. Under the Benthic Guidelines management of independent monitoring would be laid out in a clear and concise manner which would assist in the decision making of management practices in regard to environmental effects. The relocation is estimated to have a “potential benefit of approximately \$49 million annually to regional GDP and 511 FTEs if all six potential relocation sites were operated at the maximum production levels that complies with the Benthic Guidelines”, having a positive economic and social impact.

Environmental Recovery

If farms are removed from the low-flow sites, recovery of the benthic environment can occur naturally. This could then be enhanced through site restoration such as bioremediation, to quicken the recovery. This also creates an opportunity to develop seabed remediation technology and techniques which may be able to be incorporated into existing farm operations (i.e. integrated multi-trophic aquaculture) as future remediation management of seabed enrichment.

Working Group Options

The option to not move the farms that do not currently comply with the Benthic Guidelines may result in some or all low flow farms not being commercially viable, impacting on the business, local economy, and employees and families. This option may also provide little benefit to the environment as these sites will only be recovered to a “functional state” before production recommences, were production may need to be at a level that is on the maximum enrichment boundary of the Benthic Guidelines to be of any value, reaching the same environmental issues as current. This may also restrict the

Written Comment No: 0347

growth and development of New Zealand King Salmon which may impact on the development of other options for lower-flow farms comprised by the Marlborough Salmon Working Group, including:

- waste capture
- seabed remediation
- improving feed efficiency
- land-based aquaculture
- offshore farming

Optimal Option

Moving the farms from lower-flow sites to higher-flow sites would reduce the amount of deposition on the immediate benthic environment beneath the farms. Farms would comply with the Benthic Guidelines. With careful management and monitoring I believe the expected plan for NZKS is to increase production, which would have a positive economic and social effect, with potential environmental effects. The low flow sites should recover with assistance of some remediation activities. This could be an opportunity in developing new seabed remediation technology which could be used in conjunction with operational farms. Overall this could develop industry growth through the management and efficient use of marine farming space, instead of creating additional new spaces for farms.

Final Position - Favour

I am inclined towards the proposal to regulate under section 360A of the Resource Management Act 1991 to enable the relocation of up to six existing salmon farms under the operation of New Zealand King Salmon.

Reserving Judgement on Some Farms

I am however but not in favour of all of the sites that have been chosen for the farms to be moved, in relation to deposition of waste, flow rates, water current direction, farm footprint and significant marine areas (reefs, flora and fauna diversity areas). There are still

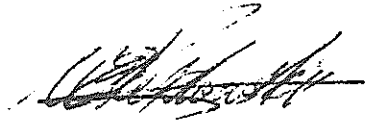
Written Comment No: 0347

some aspects that are not fully understood and would please like to be informed of the answers to these questions that relate to concerns over the option of moving the farms to higher flow sites.

Questions of Concern

- 1) Will the movement for farms from low flow sites to high flow sites result in an immediate increase in production level or will this occur over a longer time period as for precaution over environmental effects?
- 2) Will the maximum productions of higher flow farms be simulated to be at the enrichment stage of 5 without exceeding this level or will it aim for a lower ES?
- 3) If yes to production to a high enrichment level without exceeding the Benthic Guidelines (question 2), then what is the **environmental benefits** of having low production at a low flow site with an ES just under 5 compared with a higher production at a high flow site with an ES just under 5?
- 4) With regard to low flow sites, what classifies the environment to have recovered to a “functional state” and what level of enrichment would that be?
- 5) Would the proposed relocation site of Mid Channel Waitata be a navigational hazard?
- 6) Would the proposed relocation site at Tio Point, Oyster Bay increase waste and deposition in Oyster Bay as there are already three operational salmon farms in the Tory Channel?
- 7) At maximum production, what would be the waste output form Tio Point farm?

Kind Regards,

A handwritten signature in black ink, appearing to read 'Morgan Puklowski', with a stylized flourish at the end.

Morgan Puklowski

Lojkine, F., Yozin, N. & Swanberg, A. (2017). *RELOCATION OF EXISTING LOWER FLOW MARLBOROUGH SALMON FARM SITES*. Prepared for Ministry for Primary Industries.

Marlborough Salmon Farm Relocation Advisory Panel. (). *Information for the public wishing to make comment*.

Ministry for Primary Industries. (2017). *Potential Relocation of Salmon Farms in the Marlborough Sounds*.

Written Comments No: 0304

Subject	Submission re relocation of NZKS salmon farms
From	Sharyn Purves
To	aquaculture submissions
Sent	Thursday, 23 March 2017 10:24 AM
Attachments	<<Submission to MPI.docx>>

please see attached.

Sharyn Purves

Sharyn Purves, Operations Systems Administrator



M: [REDACTED] | Customer Feedback Line: +64 3 546 4855

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



ORAKINGTM

Internet e-Mail Disclaimer:

All information in this message and attachments is confidential and may be legally privileged. Only intended recipients are authorised to use it. Views and opinions expressed in this e-mail are those of the sender and do not necessarily reflect the views of the company. E-mail transmissions are not guaranteed to be secure or error free and The New Zealand King Salmon Co Ltd accepts no liability for such errors or omissions.

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

Written Comments No: 0304

aquaculture.submissions@mpi.govt.nz

23 March 2017

To: The Salmon Relocation Advisory Panel

Sharyn Purves – Quality/Compliance Dept NZKS - Administrator

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

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

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

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

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

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