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

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Written Comments No: 0027

Subject	Marlborough Salmon Farms Relocation - Summary Consultation Document
From	[REDACTED]
To	aquaculture submissions
Sent	Monday, 20 February 2017 3:13 p.m.
Attachments	<<Potential-Relocation-of-Salmon-Farms-in-the-Marlborough-Sounds-Feedback-Form- AaronSchroder.docx>>

Good afternoon

Please accept this email as my written submission.comments on the proposal to relocate the six mentioned salmon farms in the Marlborough Sounds.

I am very much in favour of the proposal being carried out as outlined on the MPI website. I have attached some additional comments using the proposal question and answer sheet.

I do not wish to speak to the Marlborough Salmon Farm Relocation Advisory Panel at hearings to be held in April.

King regards

Aaron Schroder

[REDACTED]
[REDACTED]

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:

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

Consultation questions

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

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

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

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

Written comments are official information

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

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

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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.

	I would like to speak to my written comments at a public hearing
X	I do not want to speak to my written comments at a public hearing

Questions

Question 1:

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

Yes this seems like a sensible idea as long as navigation concerns can be overcome for the new sites and that the new sites will produce better environmental outcomes while also improving the economic benefits that the Nelson Marlborough regions receive from salmon farming.

Question 2:

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

In my opinion any of them that have improved water depth and water flow over the existing sites as this is surely better for the environment.

Question 3:

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

All of them with importance provided to Waihinau Bay, Otanerau Bay and Ruakaka Bay as these sites are already being actively used and should provide the quickest benefits from relocation.

Question 4:

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

New sites 3 and 6 seem to have the obvious concerns around potential navigation by boat users as these are in central corridors. So these sites would need to have adequate lighting and navigation aids to ensure boat users can see them.

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Question 5:

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

There are bound to be unknown benefits and costs as growing fish is not an exact science. However, the general evidence appears to suggest that the farms will operate more efficiently with less impact on the environment and local residents in the new locations as compared to the old locations.

Question 6:

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

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?

Question 8:

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

Not necessarily. I think the Government needs to provide for future growth and or conversion of sites that have not yet been identified. Just as changes can occur with land based farming the same should be allowed for with sea based farming. Therefore the farmed areas should be allowed to be increased under future provisions.

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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?

One of the aims seems to be to move the farming away from recreational and residential Sounds areas if possible. However, good economic development that fits in with sound environmental management should be allowed to come before recreation in my opinion.

Question 10:

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

Question 11:

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

Yes

Question 12:

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

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Question 13:

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

Question 14:

Which of the existing lower-flow salmon farms in the Marlborough Sounds do you think are a higher priority to relocate and why?

In order of priority I would say Waihinau Bay first then Otanerau bay then Ruakaka followed by the others as resources permit.

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?

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?

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Question 17:

Are there other effects on landscape and natural character not outlined in the Hudson Associates or Drakeford Williams reports that you would like the Minister for Primary Industries to be aware of?

Question 18:

Are there any further measures that you believe could be taken to reduce effects at on landscape and natural character at the potential relocation sites?

Question 19:

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

From everything I have heard the water quality should be improved from this proposal so I'm therefore in favour of it.

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?

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Question 21:

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

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?

Question 23:

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

Question 24:

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

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Question 25:

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

Question 26:

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

Question 27:

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

Question 28:

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

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Question 29:

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

Question 30:

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

Question 31:

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

Question 32:

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

My understanding is that deeper faster flowing sites will benefit the health of salmon.

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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?

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?

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?

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?

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Question 37:

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

Question 38:

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

Question 39:

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

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?

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

I should point out that I am a proud employee of the New Zealand King Salmon Company and also a shareholder, albeit a small one. I have worked for NZKS for 15 years in the Finance and IT areas of the business and so declare that my submission has a vested interest in seeing the proposal go ahead as it will improve the farming and earning potential for NZKS. However, it also seems that the proposal is just good common sense. The farming operations will benefit from moving to sites that are better suited than the existing ones. That's not to say that the existing ones can't be used but if the same amount of space can be swapped out for better space then why wouldn't it be done and done promptly. I have a family being supported by this company and we all want to see whatever is the best for the environment, the people of the sounds, the people of the region and the shareholders. Lets manage it well and get it done.

Written Comments No: 0217

Subject	Salmon farm relocation
From	[REDACTED]
To	aquaculture submissions
Sent	Wednesday, 15 March 2017 2:48 p.m.

Dear Minister

I am a longtime resident in the top of the South whose family has long cherished the recreational opportunities that exist in the Marlborough Sounds. We own a small property there and we regularly holiday in the wider area. I am also a shareholder in NZKS.

I write in support of the proposals to relocate NZKS from low-flow sites to sites that are more sustainable in the long run.

My reasons for doing so are based on the following principles:

- The global demand for protein is increasing.
- Aquaculture holds the key to meeting the seafood component of the demand for protein sustainably.
- New Zealand enjoys a range of key comparative advantages over other seafood farming nations. Some of those advantages, such as the absence of insecticide use and anti-fouling interventions, are unique to NZ. Consequently we are ideally placed to benefit from these opportunities in a world that is increasingly concerned with issues of food safety and providential integrity.
- NZKS is a key operator in the NZ aquaculture industry. As a country we produce a significant percentage of the world's premium farmed salmon species, consumer demand for which far exceeds current supply. Consequently NZ salmon farmers are not low-value commodity "price-takers". They are high-value "price-setters" for an ever increasing range of value-added foods.
- NZKS has provided and will continue to provide much-needed regional investment in businesses and employment. Following its recent IPO it now provides investment opportunities for small shareholders like myself.
- As a country we need to take a long-term view of what is at stake here. We must ensure that effective regulatory checks, balances and controls are implemented to safeguard the environment which hosts and embodies all of these commercial opportunities. At the same time, however, we must also be very careful to ensure that businesses can flourish and Kiwis can continue to earn an honest living from the various resources that are there to be harnessed sustainably.
- I respect the views of those who fight to protect our environment. Their core aspirations are shared by all of us who wish to be responsible custodians for the legacy future generations will inherit. But I sometimes feel the more vocal opponents lose sight of the fact that it is increasingly global and domestic consumers who will hold businesses to account, not regulators who are often starved of the resources they need to do their jobs to the standard that is needed.
- One of the core value propositions for NZKS from my standpoint is that the company's products are attractive to discernable consumers who are looking to spend relatively high levels of disposable income on high-quality foods. Whether NZKS succeeds at the point of ultimate sale is entirely at the discretion of these consumers, the majority of whom are well informed and make principled choices about what they consume. That level of consumer sophistication means NZKS, like every other exporter of high-value food products, is increasingly incentivised to "walk the ecologically and environmentally sustainable talk". Consumers will punish NZKS and destroy the company's economic and social value if they don't get this consistently right.
- Our government has the opportunity to help NZKS and others like them to deliver what our high-value export markets desire.
- The long term interests of NZ Inc, in all their various guises, should not be sacrificed on the alter of Nimbyism or disproportionate risk assessment.

Thank you for considering my feedback.

Yours faithfully

Written Comments No: 0217

Kelvin Scoble

 Nelson 7010




Written Comment No: 0560

Salmon Farm Relocation

Ministry for Primary Industries

Private Bag 14

Port Nelson

aquaculture.submissions@mpi.govt.nz

To: The Salmon Relocation Advisory Panel

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

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, especially in the aquaculture area. Also jobs in the future for family. This will result 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.

Recreationally, the moorings on the new farms will create an artificial reef which will encourage fish.

Name: Nigel Seabrook

Organisation/Company: NZ King Salmon

Role: Engineer



Phone: [REDACTED]

Date: 22 March 2017

Written Comments No: 0294

Subject	Salmon Farm Relocation - Marlborough Sounds
From	Scott Gray
To	aquaculture.submissions@mpi.govt.nz
Cc	Michael Sylvester; Peter Warner; Robert Miley
Sent	Wednesday, 22 March 2017 7:35 PM
Attachments	<<Salmon Farm Relocation - New Zealand King Salmon 220317.pdf>>

Hello,

Please find attached our letter of support for the Salmon Farm Relocation, Marlborough Sounds.

Please confirm receipt and acceptance of this email.

Thank you in advance and we look forward to hearing from you.

Kind regards,

Scott Gray

www.seafarm-systems.com



8 Negara Crescent
Goodwood, Tas 7010

P: [REDACTED]
F: [REDACTED]



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20 March 2017

Ministry for Primary Industries
Private Bag 14
Port Nelson
aquaculture.submissions@mpi.govt.nz



The Salmon Relocation Advisory Panel

RE: Salmon Farm Relocation

We support the salmon relocation process being proposed by MPI on the basis that we believe the salmon farm relocation will provide enhanced environmental, social and economic outcomes. We understand that by relocating farms from lower water flow sites to higher water flows sites, fish performance will improve and increase salmon health. It will also have a lower 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 Island. Moving some farms away from baches to more remote locations will improve social amenities, which will enhance navigation.

Who we are - Seafarm Systems is a division of PFG Group based in Goodwood, Tasmania, Australia. Seafarm Systems began as a supplier to the Tasmanian Salmon industry in the early 1980's. Seafarm Systems provides end to end solutions for sea farms from farm design to infrastructure and construction and has supplied and assembled thousands of pens and associated equipment around the world including Australia, Norway, Japan, Canada, Mexico, New Zealand, Malaysia, Croatia and Singapore. We are the largest supplier of sea pens and aquaculture based mooring equipment in Australia and dominate the Australian market.

What this means for us - As a service provider to New Zealand King Salmon, moving to new sites will have an economic benefit to us and many others as well as potential employment opportunities. It will create long term security as the farm sites will be more sustainable and it will create further opportunity and growth. The request for these sites to be relocated makes complete and logical sense for environmental, visual, fish performance and sustainability reasons. We applaud MPI and New Zealand King Salmon on making such decisions to improve practices and for the foresight to be proactively leading industry change.

We currently believe we do not need to be heard by the panel, however we would be pleased to participate upon request.

Yours sincerely,

Scott Gray
Senior Sales & Marketing Manager
Seafarm Systems

Mike Sylvester, FIEAust CPEng EngExec
Chief Executive Officer
PFG Group Pty Ltd

I support economic development which is environmentally and socially responsible. I believe this development can meet these criteria. I believe the development is important to support employment in Nelson Marlborough and the Sounds and trust in the Government process to ensure sustainable development in Region.

Carolina Searle

Relocation of Salmon farms in the ~~Marlborough~~ Marlborough Sounds.

Written Comments No: 0235

Subject	Proposed Marlborough Salmon Farm Relocation
From	[REDACTED]
To	aquaculture submissions
Sent	Thursday, 16 March 2017 9:34 p.m.

Hi

We are in support of the above Proposal.

We believe that implementation of the proposal will lead to significant environmental, social and economic benefits for all stakeholders

It looks like the proposed better farm locations, with faster flowing water currents, will allow farms to farm in a more environmentally sustainable way, including implementing Best Practice Guidelines developed in conjunction with the community and Marlborough District Council. And that relocating some existing farms will improve social outcomes through moving to areas with less competing use, including moving away from existing holiday houses and areas targeted as recreational use.

Regards

Craig & Ngaire Service

[REDACTED]

[REDACTED]

Nelson [REDACTED]

[REDACTED]

Written Comments No: 0221

Subject	Proposed Marlborough Salmon Farm Relocation Project
From	[REDACTED]
To	aquaculture submissions
Sent	Wednesday, 15 March 2017 3:29 p.m.

To whom it may concern

I am fully support with Marlborough Salmon Farm relocate project
it will allow the opportunity for further growth for NZ king salmon and Relocating some existing farms will improve social outcomes through moving to areas with less competing use, including moving away from existing holiday houses and areas targeted as recreational use.

Kind Regards

Mike Shang

Written Comments No: 0411

Subject	Proposed Salmon Farm Relocation.
From	Engineering Dept
To	aquaculture submissions
Sent	Monday, 27 March 2017 11:43 AM

Salmon Farm Relocation
Ministry for Primary Industries
Private Bag 14
Port Nelson
aquaculture.submissions@mpi.govt.nz

To: The Salmon Relocation Advisory Panel.

Submission from:
John Sharp,
Engineer,
The New Zealand King Salmon Company Ltd.

Monday 27th March 2017

Dear Members of The Panel,

I would like to express my support for the potential salmon farm relocation process, which is currently being proposed by MPI.

It has been explained to me that relocation of the farms from lower water flow sites to higher water flow sites, will improve the health of the salmon, and have less detrimental effect on the seabed - which in turn which will have positive environmental and economic benefits.

Adopting the Best Management Practice guidelines that were agreed by the Council and community is the future of aquaculture globally, and New Zealand needs to keep pace with this trend.

There will be an opportunity to increase production, with more direct and indirect jobs created if this proposal goes ahead, resulting in economic improvements for New Zealand as a whole, and especially for the communities in the top of the South Island.

Moving farms away from the areas that have more holiday homes and tourist activity, to more remote locations, will improve social amenities in the region – and this is another very positive aspect of the proposal!

I do not require the opportunity to be heard by the Advisory Panel.

Yours faithfully,

J Sharp
