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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: 0219

Subject	Marlborough salmon relocation
From	[REDACTED]
To	aquaculture submissions
Sent	Wednesday, 15 March 2017 3:00 p.m.
Attachments	<<Submission MPI re Salmon relocation initiative.docx>>

I attach my submission in support of this initiative

Please confirm receipt

**Thank you
regards
Paul**

Paul J Steere

[REDACTED]

Nelson [REDACTED]

[REDACTED]

[REDACTED]

Written Comments No: 0219

I make this submission in SUPPORT of the initiative to relocate salmon farms in the Marlborough Sounds by terminating historical sites in favour of sites at new locations that are more aligned with:

- the needs of good biological growth for King Salmon and consequent economic merit
- a less intrusive location for other users of the Marlborough Sounds
- a reduced effect on the environment

This is my personal submission.

I am a previous Chief Executive of The New Zealand King Salmon Company Limited having served as CEO from its formation in 1996 through to my retirement in 2009 and have continued subsequently as a Director of the company. I was also CEO of its predecessor Southern Ocean Seafoods Limited from 1994.

My involvement in those early years may provide a unique perspective.

Commencing in the late 1970s, the early years for NZ finfish aquaculture were very much years of pioneering in a novel farming industry which was growing apace globally, with particular encouragement in Norway Scotland and Canada then followed by Tasmania and in the early 90s' by Chile. It was novel compared to centuries old land based animal cultivation and for aquaculture there had been little finfish developments apart from aquariums and certainly little intensified domestication of prized wild catch species such as Salmon.

NZ had a species of Salmon - Chinook that had been introduced from its spawning grounds in Northern California as a recreational fish as early as the 1880s through to the early 1900s. Chinook is a Pacific species that was fished as a game fish, indeed had developed a common name of King Salmon being the largest wild salmon caught at some 61.4kg (<http://www.fishbase.org/summary/speciessummary.php?id=244>). Wild catch continues to decline in the Pacific North East (BC; Wash; Oregon; California) and today is one of the smallest variety of salmon in the wild, similarly in farmed salmon - being around half a percent of catch and farmed biomass.

So the NZ species is rare and, as it has transpired from years of effort, challenging to farm.

The early years from the late 1970s were very much typical Kiwi pioneering style of trial and error with much encouragement from both Central and local government. Ranching (where salmon are released to sea 6 months after spawning in the expectation of returning to spawn some 2-3 years later) was also trialled. Concurrently shellfish aquaculture was growing at a fast rate and seemed ideal for the Marlborough Sounds. Area licenses were applied for and issued at a high pace (often shellfish licenses also allowed finfish farming) but in those early years little was known about the optimal sites for economic growth or requirements for environmental empathy. Substantial investment was lost in those pioneering years through to the early 1990s by companies such as NZ Salmon; Regal Salmon; Sanfords and Southern Ocean - well over \$100 million.

Shellfish however was booming and seeking more and more waterspace. So much so that the Marlborough District Council was unable to cope with managing that demand and Government intervened imposing a moratorium on the allocation of waterspace until new legislation was promulgated bringing order to sensible allocations. While salmon aquaculture was still struggling there was little demand for additional space, indeed the last allocated space for salmon was in 1992 being the Clay Point farm which was not initiated with stocking until 2008

Written Comments No: 0219

The economic pressure on the fledging industry resulted in a rationalisation for survival. Thanks to Ernslaw One bringing together Southern Ocean and Regal salmon assets to form New Zealand King Salmon along with providing additional working capital, the industry was energised to continue its development in 1996.

In the 40 years of global development salmon has become a ubiquitous nutritional cuisine with over 2.3million tonnes now being farmed. When I joined the Industry in 1994 it was barely 400,000mt. Much has been learnt, including here in New Zealand.

Our species may be rare yet presents some unique nutritional benefits not least of which are its high Omega content. Its presentation, colour, raw preference for sushi, mouth feel and utility for cooked presentation is prized by chefs the world over and as such demands a substantial premium over all other salmon species. This has enabled our company to concentrate on its market growth while processes under the EPA for additional allocations have been draining against those market gains.

Strong empirical evidence has been gathered that water quality, type and site location are key factors in a beneficial grow out of our King Salmon. Current/water flow, temperature, light, sunshine, water clarity and oxygen, predator avoidance (above and below water) and general stability of conditions are among the many important elements we have observed for optimal King salmon rearing. Our pioneering sites did not have the benefit of such knowledge.

Equally the need to have supportive site conditions bestows a similar stewardship need over the environment within which the site is located. We have been supportive and determined to ensure the best practice guidelines are able to be demonstrated 24/7. Again it sets us apart from farming practices elsewhere in the world where vaccines and medicines are the norm.

Our farming of King Salmon is a country and community 'good' activity. It provides substantial foreign earnings; employment both internally and externally; generates significant GNP; invests in community support projects and causes; and seeks to be a positive corporate citizen while providing an economical highly nutritional and tasty diet protein.

New Zealand has a very small marine aquaculture footprint by comparison to other countries whether they be growing salmon, shellfish or other species. We are proud of what we achieve and equally proud of our environment.

The relocation of historic salmon farm sites to researched empathetic new locations is a positive low impact development - good for the industry, the community, the country.

Accordingly, I SUPPORT and urge approval of this initiative by Minister of Primary Industries.

This submission speaks for itself and I do not seek to make verbal representations to the panel of resource management experts unless requested to respond on any matter.

Yours sincerely

Paul J Steere

Written Comment No: 0426

Subject	Proposed Salmon Farm Relocation
From	Sue Stevens
To	aquaculture submissions
Sent	Monday, 27 March 2017 11:09 a.m.

To: The Salmon Relocation Advisory Panel

Sue Stevens, Office Manager, New Zealand King Salmon

I support the potential salmon relocation process being proposed by MPI. For me the move is a win:win situation.

I am a proud employee of The New Zealand King Salmon Co. Ltd (NZKS). This is a brilliant company to work for; we have varied, dynamic and well paid jobs across the Nelson / Tasman and Marlborough regions, in addition to wider NZ and overseas. We have a fantastic team of passionate employees. Our people are what make us great - our people and our salmon.

For me the most important aspect of the potential move is the benefit to communities in the top of the South. The move will generate more jobs for both individuals (potentially 511 FTEs) and also companies that will benefit from the increased outsourcing that NZKS will require as it grows.

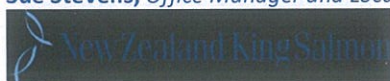
NZKS will be able to grow more fish without increasing the total amount of surface space occupied by the current salmon farms. Salmon health would also be improved due to the cooler deeper waters.

Environmentally, the move to higher water flow sites is beneficial as it will be easier to meet benthic guidelines, reduce seafloor effects and reduce effects on water quality. Adopting Best Management Practice guidelines that were agreed by the Council and the community is the future of aquaculture globally.

It is a privilege to work for a company that believes in clean, healthy and humane practices and is able to grow the best salmon in the world, as well as contributing in many positive ways to the communities of the top of the south.

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

Sue Stevens, Office Manager and Local Events Co-ordinator



W: www.kingsalmon.co.nz | [Redacted], Tahunanui, 7011



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Written Comment No: 0341

Subject	Support Salmon Farm Relocation
From	Sonja Steyn
To	aquaculture submissions
Sent	Monday, 27 March 2017 1:09 p.m.
Attachments	<<Support Relocation of Salmon Farms.pdf>>

Herewith my submission to support the MPI proposal to relocate salmon farms to higher flow sites.

Many thanks

Sonja

Sonja Steyn, *Financial Accounting Manager*



| W: www.kingsalmon.co.nz | A: 93 Beatty Street, Tahunanui, 7011



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Written Comment No: 0341

Sonja Steyn


Motueka

7143

27 March 2017

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. I believe the salmon farm relocation will provide for better environmental, social and economic outcomes.

Relocating farms from lower water flow sites to higher water flows sites will improve the fish performance, will have a lower impact on the seabed, will improve economic returns for the investors and will grow the regional economies. The positive impact on the environment is therefore a long term benefit.

Other salmon farm producers around the world have been successful in moving salmon farms to higher flow sites. This proposal is therefore not unique to New Zealand.

Further more, it is also critical to support any process where job opportunities in the regional economies can be increased in the short and long term.

I therefore support the process by submitting my written submission in favour of the salmon farm relocation.

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

Yours sincerely



Sonja Steyn

Financial & Accounting Manager

The New Zealand King Salmon Co limited

Written Comments No: 0325

Subject	Submission on proposed use of Section 360A of the RMA to allow expansion of salmon farming in the Marlborough Sounds.
From	Mike Stoneley
To	aquaculture submissions
Sent	Thursday, 23 March 2017 6:50 PM

To the Marlborough Salmon Farm Relocation Advisory Panel & Minister Nathan Guy

I am against all of the Ministry for Primary Industries' (MPI) proposals for potential relocation of King Salmon fish farms in the Marlborough Sounds.

It is abhorrent that this idea is being considered, given the state of the Marlborough Sounds and the current problems salmon farms are causing for our NZ waters. I am writing to express my dismay that Minister Nathan Guy is proposing 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 Minister should know that the Marlborough Sounds biodiversity is NOT in good shape, with issues including fewer fish, not as many species, serious loss of biogenic habitats, sedimentation in estuaries and biosecurity incursions (MDC's State of the Environment Report 2015). I am wondering if this proposal is factually wrong. I am understanding that 2 of the salmon farms to be "relocated" do not in fact exist – there has been no salmon farming on those sites for at least five years.

I'm thinking that this proposal is a blatant attempt to try and achieve for NZKS what it failed to get last time around in 2012 when it only got 3 of the 9 farms it applied for through the EPA . It appears as if the legal requirements of the New Zealand Coastal Policy Statement are being side-lined and the importance of valuing outstanding natural landscapes is being ignored..

New Zealander's need their elected officials to be looking after the environment better. Our Marlborough Sounds needs strong leaders to offer solid ideas and foresight around protection and restoration of the natural environment and marine ecosystem. They do not need proposals for further exploitation and degradation such as this one. I believe that this proposal from MPI is in fact a proposal for a huge expansion of salmon farming in the Pelorus Sound and if agreed to will mean a cluster of up to 7 farms in Waitata Reach. This will result in 2-3 times more waste discharge spread over a wider benthic footprint. There will be a greatly increased, and adverse cumulative impacts on the water column. Allowing this proposal will in time have a flow on effect for the inner waterways like Kenepuru Sound where my family and friends holiday, fish and relax. I dread to think what so many fish farms might also do to the established mussel industry.

Whilst I'm all in favour of progress, industry and employment it must not be detrimental to our environment. I strongly suspect this proposal will be destroying the environment faster than any value it could offer in return. If it goes ahead our grandchildren will be asking why did we let this happen.

Written Comments No: 0325

There needs to be smarter thinking. I submit that the Marlborough Sounds should have more extensive marine reserves, not more salmon farming on an industrial scale as is now proposed by MPI and New Zealand King Salmon (NZKS).

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

Michael T Stoneley

[REDACTED]

Blenheim

[REDACTED]

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Written Comment No: 0389

Subject	Salmon farm relocation submisson
From	Daniel Stringer
To	aquaculture submissions
Sent	Friday, 24 March 2017 2:09 PM
Attachments	<<Farm relocation submission.docx>>

To whom it may concern,

Please see attached my submission and support for the proposed salmon farm relocation's.

Thanks and regards

Dan

--

Daniel Stringer, *Team Leader - Tentburn*



W: www.kingsalmon.co.nz | A: [REDACTED]
ge, 7602



ORA KING™

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Written Comment No: 0389

Salmon Farm Relocation

Ministry for Primary Industries

Private Bag 14

Port Nelson

aquaculture.submissions@mpi.govt.nz

To: The Salmon Relocation Advisory Panel

My name is Daniel Stringer. I am currently employed by The NZ King Salmon Co. as a Team Leader at our Tentburn Hatchery. I have been involved with the salmon industry for 12 years now and all of this has been based at Tentburn.

During my 12 years working within the industry, I feel I have developed an excellent understanding, skills base and knowledge of good salmon farming practices. I have also spent time travelling to other salmon farming sites around the country and overseas (Tasmania and Chile), seen issues they have faced in Chile during their crisis, and see the potential salmon relocation process as the 'right direction' that we should be taking.

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.

By relocating farms from lower water flow sites to higher water flows sites fish health and growth performance will improve. 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.

I would like the opportunity to be heard by the Advisory Panel.

Yours Sincerely

Daniel Stringer

Written Comments No: 0213

Subject	RE: NZKS Farm Relocation Marlborough Sounds.
From	[REDACTED]
To	aquaculture submissions
Sent	Wednesday, 15 March 2017 1:19 p.m.

Thank you I do not wish to speak at the independent hearing ,

Best Regards

Murray G Sturgeon

Managing Director

[REDACTED]

[REDACTED]

[REDACTED]

Richmond, Nelson 7050

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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

Sent: Wednesday, 15 March 2017 1:17 p.m.

To: Murray Sturgeon

Subject: Automatic reply: NZKS Farm Relocation Marlborough Sounds.

Thank-you, your email has been recieved by aquaculture submissions.

Please note that all written comments received on the proposal will be published on the MPI website at the end of March.

Also, please inform us if you wish to speak to your written comments with the independant hearing panel.

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Subject	NZKS Farm Relocation Marlborough Sounds.
From	[REDACTED]
To	aquaculture submissions
Sent	Wednesday, 15 March 2017 1:17 p.m.

Dear Minister Primary Industries,

I write to Fully Support the application from NZKS to relocate its Salmon Farms in the Marlborough Sounds as outlined in their proposal.

The application as presented ticks all the boxes in my view in so far that the proposed relocated sites provide better water flows for Salmon Farming, Cleaner Sea Beds, and Better Growth of the Salmon Product, and do not impede on Recreational Activities in the Sounds.

Moreover the expansion creates, Additional Work Opportunities, Additional Revenue, and Regional & National Benefits to NZ.

NZKS has an impeccable track record on the National and International Scene and makes perfect utilisation of our natural resources , insofar that the location in the Marlborough Sounds is ideal for utilising an otherwise wasted opportunity.

NZKS should be Encouraged and Congratulated through its courage to invest in this Industry, Creating Jobs, Wealth and Benefits.

I trust Minister, you will support the NZKS Application for this proceed without any complications, the company has been through enough Financial Costs to get established in the first instance.

The costs of Legal battles discourage companies such as NZKS to further invest and develop.

Best Regards

Murray G Sturgeon ONZM.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] Nelson 7050

[REDACTED]
[REDACTED]
[REDACTED]
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[REDACTED]
[REDACTED]

Subject	Potential Relocation of Fish Farms in the Marlborough Sounds - SMI Submission [NOE-LIVE.FID1613155]
From	[REDACTED]
To	aquaculture submissions
Sent	Tuesday, 14 March 2017 1:48 p.m.

FAO MPI

Please accept this as our submission in Support of the above proposal

- Sunderland Marine Insurance (SMI) are the worlds leading Insurer of Aquaculture and have been insuring fish farms around the world, including New Zealand, for more than 30 years. As Risk Managers and Insurers we have had a continuous involvement in the Marlborough sector since 1995.
- During this time we have monitored the risk at Insured Marlborough fish farms on an annual basis. Gathering data on farm design, water quality, fish health and mortality as part of our risk assessment and livestock insurance process.
- It is our view that the proposed relocation if successful, will provide a better environment for the fish, reduce the risk of mortality and ensure that an economically sustainable livestock cover continues to be available.
- For the first decade of SMI's involvement in Marlborough, losses were infrequent and most often related to technical failures (mooring or structural problems), or accidental (as might happen through human error). Naturally occurring algal blooms were also noted as a risk although with diligent management and a strategy of moving the farm when required, the Insured have been able to minimise exposure to this problem. This was in contrast to SMI's worldwide experience where cause of loss was more commonly linked to disease.
- In recent years we have seen a shift in cause of loss around the world. In 2015, climate or environmental issues were recorded as the primary cause of loss on farms insured by SMI (over taking disease). Whilst there have been significant improvements in disease and health management, there is also no doubt that traditionally sheltered and low flow waters (such as Ruakaka Bay NZMF Licence #1), are becoming affected. For example sites such as Ruakaka and Waihinu Bay are during the summer, experiencing an increase in average water temperatures. At times exceeding what we would term 'safe parameters' for the farming of Chinook Salmon (*Oncorhynchus tshawytscha*), a species naturally occurring in cooler temperate waters.
- In 'low flow' sites, sustained higher water temperatures impose stress on fish, in turn directly impacting on their well being. Biological systems, such as osmoregulation (transfer of oxygen from the water across the gills), digestive processes and the immune system become impaired. Fish health suffers, growth rates are suppressed and mortality increases. In contrast, as has been highlighted in the MPI proposal (p3), high flow sites (generally with more stable water temperature profiles), are well proven to be beneficial enabling farmers to produce healthy stock. The new sites identified in the MPI proposal certainly meet this criteria and as Insurer's of the livestock, we consider the new proposed lease areas will be significant in respect of improving fish welfare.

Written Comments No: 0203

- The social outcomes are also noted. SMI have seen how there is increasing conflict between 'leisure users' of inshore water space and aquaculture all around the world. Any initiative that reduces this conflict is beneficial to a region as a whole. Aquaculture and leisure related industries can work well together providing secure employment and income for a district throughout a full year and in this regard there is a unique world leading opportunity to achieve an outcome that promotes both industries and indeed, reduce the impact on all the users of the Marlborough waterways.
- There have been significant advancements in the aquaculture industry over the past 20 years. Technology and biological knowledge have improved considerably. In regard of the former, improved pen design and mooring systems are now available that allow farmers to utilise high flow sites previously deemed to be precarious. Technology advances are referenced in the MPI Proposal, particularly in respect of 'low profile' automated feeding systems at the Waitata mid-channel site. We have also looked closely at the mooring designs NZKS use in high flow farms in the Tory Channel, demonstrating their experience and knowledge of operating in such sites.
- We understand that it has also been suggested by some opponents to the MPI proposal, that systems have progressed to the point where consideration should be given to locating farms on off shore lease areas, out of the sounds altogether. This author was a key-note speaker at one of the world's earliest off-shore conferences (Farming the Deep Blue – Limerick, Ireland 2004), and SMI continue to review such proposals as they arise. To date no aquaculture venture has commercially succeeded using true offshore structures. Proponents of 'open sea aquaculture' are looking to emulate offshore energy platforms or blue water vessel designs and whilst there are some exciting conceptual projects under review, it would appear that the economic and engineering viability of off-shore farms suited to New Zealand, are still some time away. A premature move into such an environment would endanger personnel and increase the risk of livestock escapes as a result of structural failures.

If required, I am happy to discuss this submission further. Although I am based in Melbourne, I am in New Zealand reasonably frequently and may be able to attend a hearing, alternatively I can be contacted on the phone or by email as per the contacts below.

Regards

Chris Kennedy

[Redacted]
[Redacted]
[Redacted]
[Redacted] Melbourne, [Redacted]
[Redacted]
[Redacted]



Sunderland Marine

Written Comments No: 0203

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Subject	Marlborough salmon relocation
From	[REDACTED]
To	aquaculture submissions
Cc	[REDACTED]
Sent	Friday, 17 March 2017 2:49 p.m.

Comment in support of the relocation of salmon farms in the Marlborough Sounds from the Sustainable Business Network. The SBN does not wish to be heard at the hearing.

The Sustainable Business Network (SBN) promotes sustainable fish farming as a source of healthy protein to feed growing populations, and to reduce both the impact of meat production on land and any non-sustainable fishing methods at sea. The SBN encourages MPI to consider these aspects in relation to location of fish farms in New Zealand waters. It also encourages MPI to take into account climate change and the impact of that on farm locations.

The SBN welcomes the relocation of the New Zealand King Salmon farms in the Marlborough Sounds to sites that will have better environmental outcomes for the production of fish and in turn better environmental outcomes for the water quality in the Sounds. The SBN supports diversifying both land and water use practices for primary production, without such practices operating to the detriment of soil, land and water.

Contact details:

Rachel Brown, CEO

[REDACTED]

Fiona Stephenson, National Communications manager

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Fiona Stephenson | National Communications Manager

[REDACTED]

sustainable
BUSINESS NETWORK
Reshaping Profit



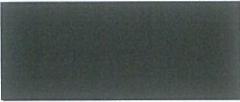
Sustainable Business Network

Writtwn Comments No: 0255

 | info@sustainable.org.nz | www.sustainable.org.nz | [Twitter](#) | [Facebook](#)

Potential relocation of salmon farms in the Marlborough Sounds.

Rukhmani Swamy



Nelson



I work at NZKS and I would like to continue working here. If we have better quality fish from the new locations we can sell more and this can provide lots of jobs for everyone.

Signed Rukhmani Swamy.

Bunny.

15/02/2017.

Subject	Submission - Marlborough Salmon Relocation - March 2017
From	<u>Gus Dannoun</u>
To	aquaculture submissions
Sent	Monday, 27 March 2017 3:52 p.m.
Attachments	<<NZKS Submission - Marlborough salmon relocation - March 2017.docx>>

Good afternoon,

Please find attached submission for Marlborough Salmon Relocation from Sydney Fish Market Pty Ltd.

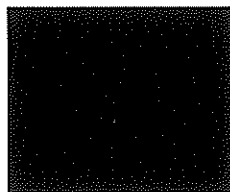
Kind regards,

Gus



Gus Dannoun
Executive Manager – Seafood Trading
Sydney Fish Market Pty Ltd
Bank Street, Pyrmont NSW 2009

Direct
Mobile
Fax
Reception/General Enquiries
Sydney Seafood School



EMAIL: aquaculture.submissions@mpi.govt.nz

Marlborough salmon relocation

Gus Dannoun
Executive Manager, Seafood Trading
Sydney Fish Market Pty Ltd
Pymont NSW 2009
Australia

Contact: [REDACTED]

This submission is presented on behalf of Sydney Fish Market Pty Ltd.

Sydney Fish Market Pty Ltd (SFM) is the largest market of its kind in the Southern Hemisphere and the third largest seafood market in terms of variety in the world.

SFM sources product both nationally and internationally (mostly from New Zealand) and trades over 13,500 tonnes of fresh and live seafood annually - with up to one hundred sustainable seafood species traded through the auction and other sales streams every day and approximately 500 species traded annually.

SFM is a joint venture between NSW Fishermen's Holding Company Pty Ltd and SFM Tenants and Merchants Pty Ltd and employs approximately 60 staff to manage and organise the weekday wholesale auction, promote Sydney Fish Market as the centre of seafood excellence and operate the Sydney Seafood School.

The site from which SFM operates is also the location for a number of Australia's largest wholesale distributors and fresh seafood retailers. As a working Fish Market the site includes a fishing port for the local commercial fishing fleet and visiting fishing vessels from others ports in NSW and interstate.

SFM has long been recognised as a leader in the Australian and New Zealand seafood industries and is proud to be Australia's Home of Seafood. As an industry leader, SFM offers guidance and support to its stakeholders through participation and representation on many industry bodies and local and international industry events.

The pillars that underpin SFM's corporate and social responsibilities extend beyond the direct business of SFM and that of its industry. Our company's ethos is built on; sustainable seafood supply, innovation and continual improvement, sound environmental management, people and community, and safe and nutritional seafood. Aligning with fishers and producers of seafood with similar values and approach to business and social responsibility is a high priority for SFM and one that the New Zealand King Salmon Company satisfies.

Sydney Fish Market is in favour of relocating all six existing lower-flow farms to deeper locations with higher water flows.

SFM's strongly supports the New Zealand Government's commitment to building a robust aquaculture industry, increasing the productivity of its natural resources but at the same time being mindful of the potential impacts on the environment from such activities.

In keeping with SFM's commitment to sustainable seafood supply, the relocation of all six farms would demonstrate environmentally responsible farming practices based on rigorous and sound science.

Further, through the use of innovation in construction of low profile farms, ongoing monitoring of water quality and feed/fish waste, coupled with the social benefits to the local community and potential economic benefits to local employment and the New Zealand economy, the relocation of the existing sites would generate strong support for the local aquaculture industry from local councils, residents and recreational water users. It is also likely to provide a source of positive messaging against any future negative attention to aquaculture activities in the Marlborough Sound.

Sydney Fish Market Pty Ltd endorsement for New Zealand King Salmon (NZKS) products

SFM and NZKS have enjoyed a strong business relationship since early 2010 and together have grown the presence and profile of New Zealand King Salmon in Australia's largest seafood market, Sydney.

Although NZKS had operated in Sydney since the mid-1990's, penetrating the retail market was difficult as the locally produced Atlantic Salmon was the preferred salmon by local wholesale distributors.

In the past seven years, together SFM and NZKS have lifted the sales of the fresh chilled Marlborough King Salmon and Ora King brands (in tonnes) by 250%. On the back of the SFM's trade in fresh whole King Salmon, NZKS has also successfully developed good support and increase in sales for its value added lines. King Salmon products today grace the shelves of many Sydney fresh seafood retail outlets and local consumers now regularly enjoy a wider choice of salmon from which to choose.

By comparison, New Zealand King Salmon sales (fresh chilled) volume is low to that of the Australian grown Atlantic salmon however, the popularity of the New Zealand produced salmon continues to gather momentum amongst Sydney's (and other key regions in Australia) finest chefs, culinary experts and the humble consumer.

Australia has an insatiable appetite for seafood. Demand outstripped local production many years ago. Australia is a net importer of seafood and latest figures from our Federal government places seafood imports accounting for approximately 80% of all seafood consumed in this country. Sydney has the largest consumption of seafood and seafood products; almost double our nation's average.

The potential to grow the sales of New Zealand King Salmon further in our markets is real however, any reduction in the production of this species in the Marlborough Sounds could setback much of the good work achieved to-date.

Increasingly, sustainability, food provenance and sound traceability systems are front of mind with a growing number of Australian consumers. NZKS has the strong credentials to enable the flow of such information. Adding the positive messages that would stem from the relocation of the six sites and ultimately their establishment in the proposed areas of the Marlborough Sounds would only strengthen the case for sound environmental management and the benefits it would deliver to people and the community. Again, key mainstays of SFM's values.

SFM identifies NZKS as a good corporate citizen and one whose values are not too dissimilar to ours. The foundation of the Ministry for Primary Industries' proposal to relocate the six farms in question and the commitment from NZKS to see it through aligns further and deeper with SFM's pillars for sustainable, safe food.

NZKS has a tremendous reputation locally and internationally for its corporate governance and producing high quality King Salmon. Implementing the proposed plan to relocate the six low-flow sites will only enhance this reputation and extend their corporate social licence to a new benchmark that will be the envy of other salmon producers around the world.

Thank you for the opportunity to provide SFM's submission to this process.

In closing, please accept our position in not attending to speak at a public hearing.

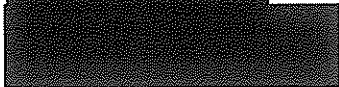
Written Comment No: 0440

Subject	Submission on Relocation Salmon Farms in Marlborough Sounds
From	<u>Peter & Margot Syms</u>
To	aquaculture submissions
Sent	Monday, 27 March 2017 9:56 a.m.
Attachments	<<Syms_Salmon_Reloc_submission.pdf>>

Please find attached our submission on Relocation Salmon Farms in Marlborough Sounds.

Margot and Peter Syms

Upper Moutere 7173



Written Comment No: 0440

Written comments on:-

Potential relocation of salmon farms in the Marlborough Sounds

Proposal to amend the Marlborough Sounds Resource Management Plan to enable the relocation of up to six existing salmon farms by regulations made under section 360A of the Resource Management Act 1991

MPI Discussion Paper No: 2017/04

By:-

Margot and Peter Symes

We do not wish to speak to our written comments at a public hearing.

General comments on the proposal

1. The proposal of the consultation document is to relocate six low-flow salmon farms totalling 9 hectares, less 1 hectare if the Crail Bay sites are not included. There are six potential higher-flow sites suggested, totalling 7.8 hectares. Although the details of the site swap scenario have not been determined, indeed feedback is sought, by putting forth six high-flow sites which are nearly equal in total area to the low-flow sites, and in finding all these sites not unsuitable for salmon farming as regards effects on water quality, benthic, navigation, seabird and marine mammal, the implication is that an area for area swap would be reasonable. However, this would swap poor productivity area for better productivity area, resulting in higher production overall. In turn this would mean more feed is used and more waste produced by the salmon into the Marlborough Sounds. With the high flow sites the waste will disperse further away from the farms and produce effects over a greater area.

2. Any total increase in production of high-flow sites over the low-flow ones they are to replace is effectively new production space. So, the proposal is to use section 360A of the RMA to give a single private enterprise which is 50% foreign owned (New Zealand King Salmon) new aquaculture space without going through the normal RMA processes of council hearings and right of appeal to the Environment Court, all of which is in place to protect our country's environment.

3. To look at the figures, the environmental monitoring reports from 2015 showed that the low-flow farms used around 5,770 tonnes of salmon feed in that year. For the proposed high-flow sites the predicted feed level per year to comply with ES5 (from Brown et al Benthic Ecological Assessments for Proposed Salmon Sites) is 24,600 tonnes. Therefore, if an area for area swap was made that would mean an increase in overall production by a factor of 4.2 is being granted in new sea space without due process.

4. To look at the quantity of the increased waste that would be discharged from the farms, we need to look at the increased feed that would be used in each Sound on its own, as they are different bodies of water. To consider Pelorus Sound: the environmental monitoring reports from 2015 showed that the low-flow farms used 2,500 tonnes of feed. For the proposed high-flow sites the predicted feed level per year to comply with ES5 is 23,000 tonnes. The other consented salmon farms in the Sound are Waitata and Kopaua (Richmond) which the Board of Enquiry granted, approving a maximum of 10,000 tonnes per year of feed under adaptive management. That makes a

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total for existing low-flow plus consented farms of 12,500 tonnes per year (2,500 + 10,000). The current proposal seeks to replace this with a total for suggested high-flow plus consented farms of 33,000 tonnes per year (23,000 + 10,000). So, it is proposed to increase the feed used in Pelorus Sound by a factor of 2.6. This is despite the fact that the Board of Enquiry when it granted King Salmon the new space considered it to be the maximum extra production it thought Waitata Reach could stand, and then only under adaptive management.

5. Some of the proposed high-flow sites are wholly or partly situated in Coastal Marine Zone 1 where aquaculture is prohibited. CMZ 1 is there to keep a balance between areas with and without aquaculture. The Marlborough District Council showed no intention in the draft Marlborough Sounds Resource Management Plan to rezone presently unoccupied space out of the CMZ1. Yet this is what the proposal to rezone areas of CMZ1 into a new CMZ4 for salmon farming would be doing.

6. The proposal seeks to deliver social and cultural benefits by moving the farms away from residential dwellings and areas of higher public use. In other words, to move them from "more-modified" to "least-modified" locations within the Sounds. Yet arguably least-modified places are more precious and should be preserved.

7. For the above reasons, we do not think that new salmon farms should be established at the six proposed high-flow sites

Blowhole Point North and South Sites

8. We are especially familiar with these two sites and can comment on them in particular.

9. Both Blowhole Point sites have high landscape values. Just to be there on the water near the entrance to Pelorus Sound provides such a feeling. Despite the fact that both sites are located within an area identified as an Outstanding Natural Feature in the proposed Marlborough Environment Plan, and within an area identified as an Outstanding Natural Landscape, the Hudson report downplays their landscape value. We will leave an in-depth discussion on this to other submitters to the proposal to cover in an expert manner.

10. All of Blowhole Point North site and part of Blowhole Point South site are in CMZ 1.

11. Both Blowhole Point sites are near Duffers Reef, located 3.4km from it across the water of Pelorus Sound. Duffers Reef is the location of one of the biggest colonies of King Shag, a bird of New Zealand conservation status of "Nationally Endangered". The reports of the proposal seem to dismiss that there would be any detrimental effect on King Shag because "*the majority of the net pens would be located in water greater than 50m deep, deeper than preferred King Shag foraging depth*". The effects of farms on water clarity, plus harmful algal blooms caused by increased nitrogen and other elements from the salmon farm waste as they affect King Shag, are not given in-depth consideration. Nor are the effects of increased noise, both in the air and underwater, properly studied. Again, we will leave an in-depth discussion on this to other submitters to the proposal to cover in an expert manner.

12. New Zealand Fur Seals: There is already a permanent seal haulout area on West Entry Point within one kilometre of Blowhole Point South site, just over 2km from Blowhole Point North site, and just over 3km from mid-channel Waitata site. There are always half a dozen or more seals on the rocks here, and seals are also present in Port Ligar. The number of seals here is increasing as the seal population continues its recovery from the decimation of over a century ago. The important point is

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that these seals are in the area adjacent to the two Blowhole Point sites first. It will be a case of the salmon farms invading their space, not a case of the seals following the salmon farms. Being at the entrance to Pelorus Sound, seals entering the Sound will have to pass these farms, and effectively get waylaid by them with the promise of easy food. So it is predictable that these two sites will have a high incidence of seal problems. How will this be dealt with? If 'predator nets' alone work, will these have an impact on the seals by frustrating their overall feeding by luring them to a food source they cannot obtain? If NZ King Salmon uses its Permit to "Take" New Zealand fur seals issued under the Marine Mammals Protection Act 1978, and kills seals here, will this effectively stop seals entering and inhabiting Pelorus Sound? The Cawthron and Associates Marine Mammals Report lists as a seal mitigation method "*acoustic seal scarers, or 'scrammers', i.e. acoustic devices that emit sounds of changing pitch, frequency and volume within seals' hearing range to deter seals from approaching cages; seal crackers ('Thunderflash' type fireworks) to scare seals away*". What is the effect of such noise deterrents going to be on the King Shag colony on Duffers Reef, 3.5 km away? As mentioned above, Duffers Reef is the location of one of the biggest colonies of King Shag, a bird of New Zealand conservation status of Nationally Endangered.

13. What will happen to the habitat for NZ Fur Seals in the whole of Pelorus Sound, if the two Blowhole Point farms and the mid-channel Waitata farm go ahead? Will the culling at these farms effectively filter out the seals as they endeavour to recolonise the Sound?

14. We consider that Blowhole Point North and Blowhole Point South sites are inappropriate for salmon farming. The Mid Channel Waitata site has similar negative aspects as we have mentioned.



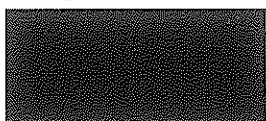
M. C. Syms



P. H. Syms

26 March 2017

Margot and Peter Syms

 Upper Moutere 7173