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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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Subject	<b>SALMON FARM RELOCATION</b>
From	[REDACTED]
To	aquaculture submissions
Sent	Wednesday, 8 March 2017 10:29 a.m.

Attention: The Salmon Relocation Advisory Panel

This email is to advise that I support the salmon relocation process being proposed by MPI. I support this relocation proposal on the basis that the salmon farm relocations will provide for better environmental, social and economic outcomes.

Relocating farms from lower water flow sites to higher water flows sites will improve fish performance and therefore the health of the salmon. It will also have a lower level of effect on the seabed which will have huge environmental benefits.

I further believe that 'Environmentally', adopting the Best Management Practice guidelines (that were agreed by the Council and community) is the future for aquaculture globally. Another benefit will be the creation of more direct and indirect jobs if the proposal goes ahead and this will ultimately result in economic improvements for the communities at the top of the south Island. Moving some farms away from baches to more remote locations will also improve social amenities which is a very good thing.

As a partner of King Salmon Label and Litho will also benefit from the relocation of the salmon farms to areas that will ensure a better environmental, social and economic outcome.

I will not be attending panel hearings in person.

Many thanks.

Name: Camilla Welch

Email: [REDACTED]

Phone: [REDACTED]

Date: 8 March 2017

 	<b>Label &amp; Litho Limited</b> 151 Hutt Park Road, Gracefield 5010 PO Box 38-412, Wellington Mail Centre 5045 Phone: [REDACTED] Mobile: [REDACTED] <a href="http://www.label.co.nz">www.label.co.nz</a>  Proudly certified to Enviro-Mark Gold since 2008	  <a href="#">Visit our website</a>
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Subject	Salmon Farm Relocation submission
From	[REDACTED]
To	aquaculture submissions
Sent	Tuesday, 14 March 2017 6:06 p.m.
Attachments	<<Supplier Salmon Farm Relocation template submission.docx>>

Please find my submission in support of NZKS attached

Regards

*Peter*

**Peter Laing**

Director

[REDACTED]



[REDACTED]  
[REDACTED]  
NELSON  
[REDACTED]  
[REDACTED]  
[REDACTED]

**NELSON ALARMS** - Security Systems Ltd

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# Written Comments No: 0206

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.

As stated above I am very pleased there is the prospect of moving some farms into deeper water.

It seems like a 'win-win' situation whereby the salmon will be better off, the environment will be better off and local boaties and bach owners should be happier.

Although I'm not a scientist I imagine the fish will have a higher chance of remaining healthy.

I am also in full support of NZKS increasing production as I have seen them operate responsibly and ethically for decades and I appreciate the way that they boost the local, regional & national economy.

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

Name: Peter Laing

Date: 14-3-17

[Redacted Signature]


[Redacted Contact Information]



Relocation of Salmon Farms in Marlborough Sounds


My name is Ane Laiseni and I have worked at NZKS for 4 years. I agree with moving the farms in Marlborough sounds because it will be healthier for the salmon to grow and we won't have a lot of waste built up on the bottom of the sea. We will be able to have more salmon in the farms and this will mean more jobs for everyone. The new sites will be better for the holiday baches in the sounds because they won't spoil their view.

Ane Laiseni



*A. Laiseni*  
22/02/2017

Submission Form for the Relocation of the NZKS  
Salmon Farms.

My Name is Van Lalhngak Lawm   
I am in agreement of the change as it will make a better  
quality Salmon & help support NZKS where I work.

This will help the company, my family & the community.  
Making King Salmon Stronger will benefit all of the above.  
Providing a better environment for years to come helping  
to feed my family & help pay my mortgage & bills.

Van Lalhngak Lawm

*Wewi*

23/02/2017

Subject	Salmon Farm Relocation Submission
From	[REDACTED]
To	aquaculture submissions
Sent	Thursday, 9 March 2017 1:41 p.m.

To the Salmon Relocation Advisory Panel

I am writing to formally lodge my support for the relocation of the salmon farms in the Marlborough Sounds.

I have been an employee of New Zealand King Salmon for 6 years and during that time I have learned to appreciate what a great product we have and how passionately the company cares about the environments in which we operate.

On a personal level New Zealand King Salmon provided me with my first job in NZ and has allowed my family to relocate to a fantastic part of the country. The spin off from me securing my role is that my partner who is a medical specialist now plays a critical role in the provision of palliative care in Nelson.

I understand that by relocating our farms and being able to operate in line with the Best Aquaculture Practice guidelines we are playing a role in securing a future for Salmon farming in the Sounds. Relocating from the UK 6 years ago made me realise how "small town" New Zealand is dependent on significant employers to provide employment and opportunity and by securing our operations in the Sounds we are securing opportunity for residents in Nelson and Marlborough.

New Zealand cannot survive by becoming the "World's Biggest Theme Park with Cows" and needs to balance environmental needs with employment opportunity.

Although I understand the organisation will survive if the relocation does not go ahead it will be an opportunity missed and the company will have to look outside the region for future growth. The obvious impacts being those direct and indirect employment opportunities will be lost.

The top of the south should be proud of the food and wine that it produces and having grown up eating Atlantic salmon I don't think Kiwis appreciate what a superb product we have. In my opinion it is truly the best seafood in the world.

I would not like to be heard by the hearings panel

Jon Lambert

--

**Jon Lambert, Learning & Development Manager**



M: + [REDACTED] | W: [www.kingsalmon.co.nz](http://www.kingsalmon.co.nz) | A: 93 Beatty Street, Tahunanui, 7011

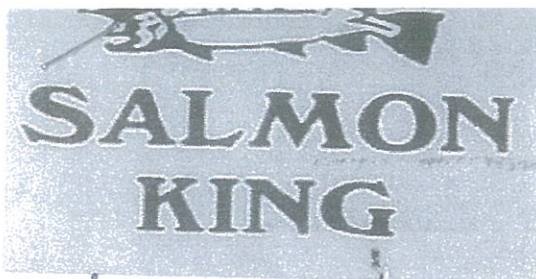


## Written Comment No: 0166



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46 Brown Street, Ponsonby,  
Auckland  
PO Box 37-158, Parnell, Auckland  
1151

Richard Lamond

Phone:

Fax:

Mobile:

3/2/17

Re: Marlborough Salmon Relocation  
Kirsten Skifter.

I am writing a submission to support more salmon farms and also to shift those salmon farms as required by NZ King Salmon Co. Ltd.

I have been a distributor of fresh salmon and smoked salmon in the Auckland region for over 23 years! In that time there has been significant change. When I started Sapper was half the price of salmon, now more expensive than salmon and in our house gurnard was given to our cat it was so cheap.

As we should all be aware salmon is rich in Omega 3 fish oil and thus is so good and healthy for your heart and well being. This may be why so many NZ'ers are now eating salmon which is great. You will find omega 3 fish oil available in capsule form and recommended by many doctors. So what a magnificent product salmon is for all NZ'ers, great taste, affordable product and so good for you.


Salmon farming is a significant and important contributor to the NZ economy with exports and also employing many NZ'ers, not just at the Nelson and Picton offices of NZ King Salmon but the many

NZ'ers like me who supply salmon across NZ. You will note the many hotels, restaurants and cafes that have salmon on their menu.

Please also note that salmon has increased in price from January 2017 because the existing salmon farms cannot keep up with demand. This is ridiculous and should not be allowed to happen so it is essential for the NZ economy and the health of NZ'ers that NZ keeps up with this demand.

NZ King Salmon Co have been salmon farming in the Marlborough region for over 20 years. They have a proven track record and are very aware of environmental issues and concerns. I am certain that moving the existing farms to better locations will be done for the right reasons as NZ King Salmon Co Ltd can be trusted to be very professional and caring to the environ. It is in their best interests to do so, so I am sure that they will pass any environmental concerns.

Kind Regards



Richard Larnard  
(Director)



## Written Comments No: 0017



12 December 2016

Memo: Price movement notification

The New Zealand King Salmon Company Limited has recently reviewed pricing within each market we supply.

The global demand for all salmon remains very strong. This demand continues to outstrip the supply and has created a shortage around the world as well as here in New Zealand.

This demand pattern has placed pressure on stock and growing conditions have also meant that the growth of our salmon has been affected. Sizing through January and February in particular will be slightly smaller than normal.

We have held any increase for prices for as long as possible and have been particularly mindful of the festive season period. However, we cannot delay this indefinitely and as of the 9th January 2017 the attached prices will apply.

Best Regards

Graeme Tregidga  
**General Manager Sales**



Taken from the booklet 'People of our Sea'  
'A day in the life of New Zealand's seafood industry' 2009

# days in the sounds

①

*Many people* would pay thousands of dollars for a holiday that resembles Mark Preece's daily job. He lives in Blenheim, the heart of wine country, and manages five sea farms in the idyllic Marlborough Sounds – speed boat only access.

However, what he values most about the industry is the people and the challenges of farming one of New Zealand's favourite seafoods – salmon.

"Salmon is a pretty challenging fish to grow. You're always looking at how to improve quality, health, and efficiency to get the best cut of fish for the market, but you do get to work in a pretty beautiful place."

## Best job

Mark has worked for New Zealand King Salmon as the company's sea farms manager for nine years. His role is to oversee the running of the five farms, 38 shift workers, a specialised dive team, and the five farm managers.



NAME: Mark Preece  
YEARS IN INDUSTRY: 15  
OCCUPATION: Salmon Farms Manager,  
New Zealand King Salmon  
LOCATION: Marlborough Sounds





*"You're consistently looking at how to improve quality, health, and efficiency to get the best cut of fish for the market."*

2

"There're lots of career opportunities in salmon farming," says Mark. New Zealand King Salmon offer on the job training so employees can work toward achieving their National Certificate in Aquaculture or a dive certification.

"If you like the benefits of shift work, working in the outdoors, diving or have a science background then there's a place for you on salmon farms."

And you're certainly not roughing it. Occasionally, Mark and his team need to stay overnight at the farm. The barge (which is like a floating three-bedroom home) is equipped with all the comforts of home including a flat screen TV – not that you would watch TV when a Marlborough Sounds' sunset is just out the window.

Mark is also responsible for scouting new technologies. He travels overseas about once a year to conferences and sea-farms looking for better ways to farm salmon.

### Daily duties

Mark spends about three days a week at the sea farms where he monitors the day to day running from feeding, weighing and measuring

smolt to net cleaning, diving and harvesting. Feeding the salmon is operated via computer in the comfort of the barge.

Each of the farm's 18 pens (housing about 50,000 salmon each) gets pellets up to three times a day depending on the age of the salmon.

Genetics plays a key part in salmon production too. Smolt that have been micro-chipped are weighed and measured to discover who carries the strongest traits for growth and quality.

These smolt are the siblings of the future parents of the salmon that will be harvested for the market. Salmon take about 12-18 months before they are ready to be harvested.

### Training

Working in the seafood industry is in Mark's blood – he grew up on Pitt Island in the Chatham Islands and worked as a rock lobster fisherman and paua diver. During this time he got his skipper's ticket and dive licence. He then went on to study marine science at university and is currently working toward a Master in Business Administration.

## Written Comment No: 0180

NZ'ers like me who supply salmon across NZ. You will note the many hotels, restaurants and cafes that have salmon on their menu.

Please also note that salmon has increased in price from January 2017 because the existing salmon farms cannot keep up with demand. This is ridiculous and should not be allowed to happen so it is essential for the NZ economy and the health of NZ'ers that NZ keeps up with this demand.

NZ King Salmon Co have been salmon farming in the Marlborough region for over 20 years. They have a proven track record and are very aware of environmental issues and concerns. I am certain that moving the existing farms to better locations will be done for the right reasons as NZ King Salmon Co Ltd can be trusted to be very professional and caring to the environ. It is in their best interests to do so, so I am sure that they will pass any environmental concerns.

Kind Regards



Richard Leonard  
(Director)



Relocation of Salmon Farms in the Marlborough Sounds

Sopharina Lang



I work at NZKS nearly four years. I support the farms moving to better water because can make the fish healthy and good quality. We can grow more and have more customers to buy more salmon. And company can have more jobs so people can support their families. Its good and healthy for the sounds if farms are moved to faster flowing water.

Sopharina lang  
A handwritten signature in blue ink, consisting of stylized cursive letters.

## Written Comment No: 0178

Subject	<b>salmon farm expansion submission</b>
From	[REDACTED]
To	aquaculture submissions; Alex Lang
Sent	Friday, 10 March 2017 1:04 p.m.
Attachments	<<Lang.pdf>>

see attachment



# Written Comment No: 0178

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

Email to:  
[aquaculture.submissions@mpi.govt.nz](mailto: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	ALEXANDER JAMES LANG
Address	GERMINE BETTY LANG, PICTON
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 checked="" 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).

## *The Board of Inquiry* Written Comment No: 0178

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:  
WE HAVE COME FROM AN AREA IN WHICH THE RIVER WAS  
POLLUTED BY ALGAE AND CAUSED HUGE FISH MORTALITY AT  
VARYING TIMES DEPENDING ON CONDITIONS  
WE NEVER WANT TO SEE THIS IN PELORUS & KAIHORO SOUNDS

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

## Written Comments No: 0205

Subject	Submission for Salmon Farm relocation
From	[REDACTED]
To	aquaculture submissions
Sent	Tuesday, 14 March 2017 2:09 p.m.
Attachments	<<salmon farm relocation.docx>>

Hi

Please find enclosed my comments. If there is anything you feel is missing or not clear please do let me know.

Many thanks, Katrina

*Katrina Lange*

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

# Written Comments No: 0205

Date: 14 March 2017

RE: Marlborough Salmon Relocation

To whom it may concern:

I would like to show my support of the move of the current salmon farms to the higher flow sites.

I believe the research into the relevant sites has been comprehensive and carried out to the best possible outcome of less problematic effects on the Environment.

The alternative to comply with the Benthic Guidelines, would mean lower production, which would in turn could reduce the economic benefits and have potential adverse social effects through job losses which is not beneficial to our region.

However, I feel there will be numerous beneficial outcomes to the relocation of these farms including:

Better sustainability outcomes for the industry - a key factor being that the Farms will meet the Benthic Guidelines.

There should be reduced seafloor effects directly below the salmon farm compared to the current lower-flow areas.

It should provide opportunities for improved management of biosecurity risks of which there has been extensive research. From this there would also be improved environmental monitoring and adaptive management.

I can also see there are potential better social outcomes such as Farms moved out of areas with high recreational use. There would improve visual effects, reduced noise, lighting, and odour effect all of which are of direct benefit to the residents near to the current low-flow sites as the farms will be further away from populated bays.

I believe there would be improved economic outcomes as well, both in terms of regional GDP and more jobs available.

I do not wish to speak at the hearing.

Katrina Lange

[REDACTED]  
[REDACTED]



Subject	JL Salmon Farm Relocation March 2017.docx
From	<a href="#">Jonathan Large</a>
To	aquaculture.submissions@mpi.govt.nz
Sent	Monday, 27 March 2017 5:45 PM
Attachments	<<JL Salmon Farm Relocation March 2017.docx>> <<Untitled attachment 00003.htm>>

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

# Written Comment No: 0380

27<sup>th</sup> March 2017

aquaculture.submissions@mpi.govt.nz

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

To whom it may concern,

I Jonathan Large support the 'Potential relocation of salmon farms in the Marlborough Sounds'

My full name is Jonathan Bruce Large. I am a marine farmer and have been involved in the mussel industry for 38 years. Starting as a youngster growing up in my family's mussel farming business in the Pelorus Sound. I also own and operate a small vineyard.

I holiday, work and play in the Marlborough Sounds. Our family owns a bach in Kaiuma Bay which we frequently use. I use the Sounds as my playground. I am a land owner, a marine farm owner and a recreational user that fishes, scuba dives and hunts within the Sounds and the Marlborough region. I enjoy nothing more than taking my family and friends out in the Sounds to give them the "Sounds experience" that I enjoy almost every day.

I consider myself as being in touch with all aspects of the Sounds I strongly believe in the need to protect the Sounds so all residents, users including commercial users can co-exist in a harmonious way.

I hold an Inshore Launch Master qualification (since 2001) and have extensive maritime experience in and around the Hauraki Gulf, Coromandel, Marlborough Sounds, Tasman Bay and Golden Bay.

Currently I am the South Island Marine Farm Manager for Cedneco Aquaculture Limited (Cedenco) based in Blenheim. I am also the Farm Manager for the Marine Farming Association's (MFA) 12 spat sites. I am responsible for the management of a further 15 marine farms in the Marlborough Sounds. These sites comprise of spat catching and spat holding sites (owned by the MFA). Plus farming sites owned by various individuals and entities.

From these sites I manage the 3000 tonnes (per annum) of crop. From the sourcing of spat and spat catching operations throughout the Top of the South. Right through to the harvesting operations that provide product for the factories to process

I support the mechanism behind the potential relocation of salmon sites in the Marlborough Sounds

I support the proposal to make regulations under section 360A of the RMA to amend the Marlborough Sounds Resource Management Plan to enable the relocation of marine farms.

I support proposals which provide improved environmental performance for the industry.

I support the Marine Farming Association submission

Here in Marlborough we grow the best mussels, oysters and salmon in the world. If the world wants to continue to eat and enjoy the health benefits of this seafood, in the future this has to come from

## Written Comment No: 0380

aquaculture production. Here in Marlborough we are positioned well environmentally and reap the economic benefits from the aquaculture industry.

I personally consider the relocation process to be one of continuous improvement this has been shown in the past when salmon farming first started in Hallam Cove and in Port Underwood. When the technology to be able to farm in deeper water came along these sites were shifted. I see this process as another step in the process of farming salmon sustainably in the Sounds. As technology improves who knows where salmon we will be farmed in 15 years' time. We need the flexibility to move with that technology.

I wish to be heard

Regards

A handwritten signature in blue ink, appearing to read 'Jonathan Large', with a stylized, flowing script.

Jonathan Large



## Written Comment No: 0372

Subject	<b>Submission on Marlborough Sounds Salmon Farming</b>
From	<a href="#">don</a>
To	aquaculture submissions
Sent	Friday, 24 March 2017 11:14 a.m.
Attachments	<<Wendy Larner Salmon Farming Submission.pdf>>

## Written Comment No: 0372

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

Email to:  
[aquaculture.submissions@mpi.govt.nz](mailto: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  
Address

WENDY LARSEN

Email

MARLBOROUGH SOUNDS

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="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 Comment No: 0372

### ***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 independent economics 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:

*I note the recent OECD report which underlines the fact that the NZ government is privileging economic development at the expense of the environment - the message is clear and we need to act on it.*

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



Subject	NZ King Salmon Farm Relocation positive submission letter
From	[REDACTED]
To	aquaculture submissions
Sent	Monday, 20 February 2017 6:35 p.m.
Attachments	<<Grant Lazarus MPI Positive Submission.docx>>

To whom it may concern,

I Grant Lazarus current state sales manager for NZ King Salmon Co. in Australia with the attached letter outlining

my personal thoughts towards the salmon farm relocation proposal .

I am sending this through with a positive and huge yes towards the relocation of the 6 proposed sites.

I do not need to go before a panel and happy to submit my view in writing.

Cheers

Kind Regards

Grant Lazarus

NSW, QLD & NT State Sales Manager Australia



[REDACTED]



[REDACTED]

[REDACTED]



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[Ora King Salmon](#)



[Ora King Salmon](#)



[Ora King Salmon AUS](#)

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## MPI Positive Submission

Grant Lazarus – Australian State Sales Manager

To whom it may concern,

I am in favour of the proposal for NZ King Salmon to relocate their sites to a more suitable location. Reasoning behind my favourable submission are as follows; I care about the environment where I work and play, I believe the community will benefit from a boost in local jobs and I strongly believe in our world class product both here and representing NZ abroad.

I am based and work abroad in Australia as the State sales manager for NZ King Salmon Co. The region where our Salmon is raised is simply stunning! I work with both the Regal Marlborough King Salmon and Ora King brands. My job is to sell both our amazing salmon and the Sounds as it is one of our unique selling propositions to be the only company to farm in this area. We sell our salmon based on how beautiful the area is. We also sell the salmon based on our environmental accreditations. We need to ensure that we keep the area beautiful to continue selling this message and ensure we meet our environmental obligations.

Another aspect of my job is to show my customers, Australian chefs and the general Australian consumer the Sounds and take them out to the farms. It's a privilege and honour to be able to host Australian chef and wholesale visitors who have often never been to the region. They always leave blown away by the beauty of the area and return to Australia raving about it to their friends and work colleagues and often post on social media or in other forms of media (radio, tv, magazines etc). This will undoubtedly influence and bring further tourism to the area.

Outside of work I am very much into the outdoors and spend a lot of my personal time surfing and enjoying the ocean which gives me a unique appreciation for the sea. I am continuously conscious of its wellbeing. This thought process extends to the pristine Marlborough Sounds which is an important part of my personal livelihood. I also see this through my NZ based work colleges, locals and tourists who enjoy the beauty of the water and the area in general.

Moving to high flow sites will ensure that we can have a reduced amount of waste on the seabed floor and can maintain the Sounds for the future of not only our brand with consumers, inviting visitors to the area but also for recreational use for generations to come.

I'm a 41 years old and started working at King salmon 8 years ago. I come from a chef background and my appreciation for responsibly grown and sourced foods is the reason I went for the job initially. Since then I have been exposed to a tremendous amount of opportunity within the company and get to work on a world class brand. I hope that companies like NZ King salmon can continue to grow and employ more skilled workers such as myself. We should be supporting companies that are willing to grow and develop people's careers. This is not just the case with me in sales but also a range of professions like Aquaculture, marketing etc .

There are many people who rely on our business within NZ as well as in Australia such as my family, my wholesale and distributors customers and their families and our chef / restaurant owners and their families to operate and keep businesses running by having a unique responsibly grown and sourced product.. We should be encouraging this even more

## Written Comments No: 0028

and I think better quality water space will provide us with additional revenue to continue building local and international business and give us more flexibility to give back to the community.

As mentioned I work with and sell both the Regal and Ora King salmon brands to everyday chefs, wholesalers and consumers within the Australian market. We generally have great quality salmon but we are restricted in how much we can make due to lower quality fish or generally not having enough supply to meet demand. Chefs, wholesalers and general people love our product and it is such a great way to get our recommended daily intake of omegas. Aquaculture is the most sustainable way to grow salmon and feed our growing population with this great, healthy product. If the only restriction is good, quality water space then I really don't know why this hasn't happened sooner? Shouldn't every person around the world be able to enjoy salmon and all the goodness it feeds our body? Shouldn't we leave the oceans to repopulate and think of a longer-term strategy to feed the masses?

This site relocation proposal has so many benefits to the local community, economy and families both in NZ and abroad and I hope that we are able to get healthier salmon with reduced environmental impacts. I cannot think of a rational explanation as to why the proposal would not go ahead.

Regal '**Marlborough**' and Ora King Salmon is a world class brand and product that we should be able to supply not only to **all** Kiwis but showcase how NZ can produce the best food & wine across the globe and also promote tourism to the region

Kind regards,  
Grant Lazarus



Potential relocation of salmon farms in the Marlborough Sounds

Dai Le

[REDACTED]  
[REDACTED]

I and my wife both work at NZKS and we were lucky enough to be able to immigrate to NZ to make a better life for ourselves. Nelson, Marlborough area is very beautiful and we love to live here. We need our jobs at King Salmon to support us. There is not a lot of work at the top of South Island and we need to keep this factory running.

I support the moving of the 6 farms to healthier sites so we can grow a better product and keep us all in work. I hope everything goes well and we don't lose these farms altogether because we need these farms to provide our customers with fish and us with work.

Signed



DAI Le

16 / Feb / 2017.

## Written Comment No: 0400

Subject	<b>Submission re Salmon Farm relocation.</b>
From	<a href="#">John Leader</a>
To	aquaculture submissions
Cc	[REDACTED]
Sent	Friday, 24 March 2017 4:07 PM
Attachments	<<Submission to the Board of Enquiry in to the relocation of salmon farms in the Marlborough Sounds.docx>>

Attached please find a submission from Des Boyce and myself. We would like to be present at the hearing.

John Leader.

## Written Comment No: 0400

Submission to the Board of Enquiry into the relocation of salmon farms in the Marlborough Sounds.

John Leader and Des Boyce.

### Statement of interest.

My full name is John Peter Leader, and my address is [REDACTED] Blenheim. I am a retired biologist with more than fifty years of experience. I hold the degrees of BA from Cambridge University and PhD from Bristol University, and I have carried out research and teaching at the Universities of Bristol, Aberystwyth, Auckland and Otago. I have carried out considerable research on the effect of environmental variables on the physiology of animals, including many marine organisms, and have an extensive series of publications on these topics. In addition I have supervised many postgraduate students in this field. While employed at the University of Otago, I played a major role in the redesign of the Public Aquarium at Portobello, and managed it after its reopening. Since moving to Blenheim I have completed, with my colleagues Pierro Rocco, and my wife, Dr Jennifer Bedford, a semiquantitative study of the mesoplankton in Queen Charlotte Sound and the Tory Channel, work which is currently being prepared for publication. In addition I am a member of the expert group assisting the Ministry of Primary Industries on methods to expedite the resilience of the scallop fishery in the top of the South Island. I am also secretary of the Marlborough Recreational Fishers Association, a body whose aim is to comment on matters of concern to the recreational fishermen in the Marlborough Sounds.

Des Boyce has been resident in Marlborough for many years and has been deeply involved with developments in the Sounds for the past forty years. , He was a foundation member of the combined divers group which was instrumental in establishing the Marine Reserve at Long Island in Queen Charlotte Sound. and was a founder member of SoundFish, a group of experts, representative of the recreational, commercial and customary fishers, set up to offer advice to the local Council and Government on matters of concern. As a member of the Marlborough Recreational Fishers Association he has for many years been an expert consultant on the scallop fishery in the top of the South Island. For many years he held a commercial operator's ticket to operate his own boat to assist in tourist activities and carried out survey work and conservation activities for the Department of Conservation.



### Submission:

It is our considered opinion that NZ King Salmon should not be allowed to relocate their farms according to the plans they have proposed, for a number of reasons.

1. As Des Boyce and I, in our Submission to the Environmental Protection Agency concerning King Salmon's earlier application, argued, in common with many other submitters, this is an entirely unjustified appropriation of public space, in which the rights of other individuals to enjoy the special qualities of the Sounds, is removed without compensation, and which rewards the public with pollution of the sea floor, unsightly structures and noise. The recent experience of the environmental damage sustained in Tasmania's Macquarie Harbour, where extensive pollution of the sea floor has led to instructions from the Australian Environment Protection Agency for destocking of salmon farms there, and which shows reprehensible abandonment of the stewardship of the operators, is a clear demonstration that operation of these poorly managed farms, in shallow and slowly moving water, creates an unsightly and long lasting mess. Even by their optimistic standards, the farm sites to be abandoned by King Salmon will take up to ten years to return to anything like their original state. In addition it is not clear, from the documents available to us, who will provide the expert independent services necessary to ensure compliance with any imposed conditions. If, as seems likely, this burden will fall on Marlborough District Council, then this is an additional and unwelcome burden for local ratepayers.

2. In their earlier application to the Environmental Protection Agency, King Salmon stated that they had examined in great detail all possible sites for salmon farms in the Sounds, and had identified the only suitable sites. In the matter of a few years they seek permission to move their farms to new sites, different from those previously identified, and which have been identified as prohibited for farming by the District Council. This shows a cynical and blatant disregard for local body regulations. Limitations on farming have been imposed for very good reasons, to allow preservation of precious local values, and should not be lightly cast aside, particularly when they use a government department, obsessed with a profit motive, to override local feelings.

3. The most persuasive argument, however against allowing King Salmon to move their farms to new sites is that they are proposing to continue to use third-world practices. It is now well established that a better practice is to farm fish away from inshore waters, where, no matter how well flushed it may be, fish may be exposed to excessively high temperatures and low oxygen levels, and where there is a risk of introduced disease spreading throughout the local populations. In addition, any less than scrupulous husbandry will lead to the congregation of predatory animals such as sharks and seals.

NZKS make much of the fact that they are moving their pens to high flow sites where any detritus can be distributed over a wider area. However while stating that no

## Written Comment No: 0400

additional water space will be occupied by the pens they propose a substantial increase in stocking rate, which will obviate this claim by increasing the amount of waste to be dispersed. In addition, their diagrams of current flow around the pens, particularly in regard to the Waitata site, shows that inward flow past the pens is greater than the outward flow. Hence waste will flow back and forth around the pens and add to benthic deposits.

There are two generic solutions which offer ideal solutions to these problems, and which are used in different variations throughout the world. Of these, open ocean aquaculture is now a well –established practice commercially as the Table below indicates.

Table 1. Countries in which commercial open ocean fish farming is undertaken.[From *Wikipedia-Open Ocean Aquaculture. E –experimental, C-commercial*] *Information up to 2012.*

Location	Species	Status	Comment
Australia	Tuna	C	10000 tonnes per year
California	Striped bass, California yellowtail, Pacific halibut	E/C	Off oil platform
China	Finfish, scallops	E	Small scale experiments.
Croatia	Tuna	C	8 offshore cages (1998)
Cyprus	Sea bass, sea bream	C	8 offshore cages (1998)
France	Seabass, seabream	C	13 offshore cages (1998)
Germany	Seaweed, mussels	E	Trails using wind farms.
Greece	Seabass, seabream	C	
Hawaii	Amberjack, Pacific threadfin	C	
Italy	Seabass, seabream, tuna	C	
Japan	Tuna, mussels	C	Commercial tuna ranching
Malta	Seabass, seabream, tuna	C	3 offshore cages
Mexico	Tuna	C	
Morocco	Tuna	C	
New Hapshire	Atlantic halibut, cod, haddock, flounder	E/C	Experimental
<b>New Zealand</b>	mussels		
Panama	Tuna	C	
Puerto Rico	Cobia, snapper	C	
Spain	Seabass, seabream	C	
Turkey	Seabass, seabream	C	
Washington	Sablefish	C	
Taiwan	Cobia	C	3000tonnes (2001)



It is unacceptable that NZKS can argue that there are no commercial fish farming operations in the open ocean. The core technology is now well understood, and the advantages are clear. The fish can be exposed to a high flow of clean, well-oxygenated sea water, and food waste and faeces are dispersed over a wide area. The principal obstacle, the high energy of the ocean can be overcome in several ways, for example by firmly anchoring pens to the sea floor or by enabling the pens to sink when exposed to storm conditions. Feeding can be accomplished using electronically controlled hoppers, thus reducing the servicing costs. Carefully chosen sites can be selected which would use the waste products to fertilise the surrounding area, a form of multitrophic aquaculture in which nothing is wasted, since it encourages the growth of filter feeders and macroalgae. In Europe there is considerable interest in combining fish farms with offshore wind farms using the solid bases of these structures as existing anchorage sites

It is our opinion that an even better solution is offered by land-based recirculating aquaculture. In systems of this kind salmon are grown in large tanks but the system is completely closed. Sea water driven to the optimum temperature can be oxygenated and the optimum composition controlled. After passage through the pens, the water, containing waste products and faecal matter can be passed through beds containing in turn filter feeders, such as mussels and clams, thus providing a second and lucrative crop, and then to further tanks growing macroalgae, before being returned and recirculated. Such systems, while currently existing only as conceptual designs, clearly have many advantages. To me the exciting opportunity offered by these systems is the employment opportunities it offers. Instead of low paid labourers, such systems would employ innovative and well paid engineers and biologists, in a clean industry which could generate many developmental possibilities. In a world which is increasingly interested in properly sourced food, the premium which such a method would attract could be well worth the initial expenditure. Sited on waste land, it would overcome almost all the objections to inshore farming.

4. NZKS advertises claims about the quality of their fish products which are at best duplicitous and at worst incorrect. The rising cost of fish meal and fish oil means that these predatory fish are fed a diet of chicken offal and soy (which incidentally almost certainly contains an amount of genetically modified material) as well as antibiotics and pesticides which are incorporated into the flesh of the fish. The red colour of the fish, which their advertisements says is due to their being raised 'in the pristine waters of the Sounds' is actually due to the addition of astaxanthin, extracted from cultures in Nelson. In addition, they have clearly demonstrated by the high mortality they have experienced, year after year, that they are incapable of good management practice. A land-based farmer who lost 20% or more of his stock would soon be out of business. It is really unacceptable for NZKS to acknowledge that the area under some of the recently disused pens will be anoxic for up to ten years.



## Written Comment No: 0400

5. In the course of our study of the mesoplankton in the Sounds we have been keeping records of water temperature at depths of one, five and ten metres, over the past three years. Each summer for long periods water temperatures exceed 17degrees C in the Tory Channel, and this is confirmed in published records of the Marlborough District Council. This is close to the upper lethal temperature for salmon, and undoubtedly stresses them in crowded conditions, and which, in combination with falling oxygen levels as the temperature rises, probably partly accounts for the still unexplained excessive mortality experienced in successive years. The Company is well advised in its plans to build a pet food industry!

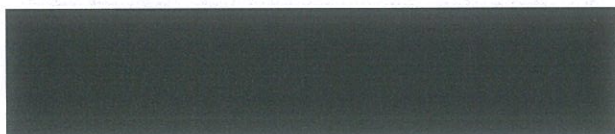
There is already good evidence for a steady increase in temperature of the ocean waters. Thus a situation will arise where the salmon, near their upper lethal limits already, are likely to be exposed to even greater stress, with higher mortality, in the future. That will leave no recourse other than to move the pens again, to cooler places.

6. Finally, we object on philosophical grounds to the fact that we are encouraging the plundering of Peruvian anchovies, thus depriving peasants there of their livelihood by overfishing, in order to market costly product to rich Americans. This is not the way to address an impending world food crisis caused by a burgeoning population.

John Leader, BA, PhD.

Des Boyce.

Email:



We wish to appear in person before the Board.

Subject	<b>Aquaculture Submission</b>
From	<a href="#">Gail Learmonth</a>
To	aquaculture submissions
Sent	Thursday, 23 March 2017 1:57 PM
Attachments	<<GailLearmonth.docx>>

To whom it concerns,  
Regards  
Gail

*Gail Learmonth, Net Loft Supervisor - Aquaculture*



M: [REDACTED] | W: [www.kingsalmon.co.nz](http://www.kingsalmon.co.nz) | A: 43 Dublin Street Picton, 7250



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# Written Comments No: 0310

Salmon Farm Relocation

Ministry for Primary Industries

Private Bag 14

Port Nelson

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

To: The Salmon Relocation Advisory Panel

Gail Learmonth, Net Loft Supervisor, New Zealand King Salmon

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. I feel that the environmental considerations are the most important aspect of this relocation. NZ King Salmon needs to continue to robustly monitor the effect on the environment of its farms. There needs to be a balance between the good for the environment and the benefits of the Company growing more fish.

If this balance is achieved, then I can see that there will be benefits for the communities of the top of the south. This would include more direct jobs (NZKS employing more people) and indirect jobs (NZ King Salmon needing to use more local support services).

I feel that adopting Best Management Practice guidelines that have been agreed to by the Council and the community is the future for aquaculture locally and globally.

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



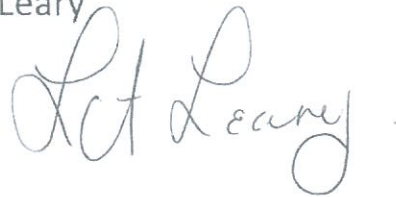
## Written Comment No: 0010

Leonee Leary – Trainer at New Zealand King Salmon

Cell – [REDACTED]

Email – [REDACTED]

Signed Lee Leary

A handwritten signature in cursive script that reads "Lee Leary". The signature is written in dark ink and is positioned below the printed name "Signed Lee Leary".

Subject	<b>Submissions RE: salmon farm relocation</b>
From	Kristin Spaetzel
To	aquaculture submissions
Sent	Tuesday, 28 February 2017 4:20 p.m.
Attachments	<<C.Wells.pdf>> <<D.Ray.pdf>> <<K.Boaz.pdf>> <<K.Duff.pdf>> <<K.Spaetzel.pdf>> <<M.Leary.pdf>> <<M.Wells.pdf>> <<N.Wells.pdf>> <<S.Guy.pdf>> <<S.Wells.pdf>>

Hi,

I am writing as I have collated a number of submissions from people I know and their friends and family. Each letter is the same, however each individual has signed and dated their own copy to show their support for the idea. I felt this was the easiest way to register the support of a large number of people who are in favor of the idea of moving the sea farms but who would be unlikely to take the time to compose their own personal letter. Hopefully this will even things out as I realize people in favor are less likely to put in a submission than those who are against. Each individual has read and stated that they agree fully with the written statement. If you wish to contact any individual or obtain contact information please don't hesitate to ask.

Thank you for your time.

Regards,

Kristin Spaetzel

BScH. Marine and Freshwater Biology

## Written Comment No: 0135

To Whom It May Concern:

I wish to add my support to the proposal made to relocate certain sea farms. I believe it will be beneficial to the fish being raised, the surrounding environment, the local community, and the economy.

Regards, *Mike Leary*  
*m* *h*  
*23/2/17*



Re: Relocation of Salmon <sup>for the high</sup> ~~Farms~~ <sup>Farms</sup> Written Comment No: 0055

I support the proposal of NZKS to relocate their low flow farms to high flow locations.

I support this because I think it is good for the economy of the region. It will provide more jobs and with that more security and wellbeing for our families.

Besides that it will be better for the environment, because the impact on it of the new farms will be smaller.

Monika Lehnhardt



## Written Comment No: 0512

Subject	Salmon Farm Relocation Submission
From	<a href="#">Brad Lewis</a>
To	aquaculture submissions
Sent	Sunday, 26 March 2017 7:16 p.m.

To: The Salmon Relocation Advisory Panel

**Brad Lewis, Engineering Team Leader NZ King Salmon, Picton**

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.

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

Obviously as I work for King Salmon I wish for the company to be able to operate our business in a safe, economic and long term sustainable way so that it secures my future for myself and my family. If this relocation process is able to be implemented it would be the best thing for the future of all parties involved.

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

Regards

Brad Lewis

[Redacted Signature]

## Written Comments No: 0529

Subject	<b>Submission on salmon farm relocation plan.</b>
From	<a href="#">Rod Littlefield</a>
To	aquaculture submissions
Sent	Sunday, 26 March 2017 7:44 p.m.

I strongly object to and oppose the proposed relocation of salmon farms in the Marlborough Sounds, overriding the Marlborough District Councils resource management plan.

I consider salmon farms a source of high pollution and a high risk with respect to disease.

The high pollution level under and around salmon farms must be very damaging to the fragile blue cod habitat.

The recreational fishing public and tourism should be more important than risky private enterprise.

Rod Littlefield

Blenheim'.



## Written Comment No: 0314

Subject	<b>Salmon Farm Expansion</b>
From	<a href="#">path finder</a>
To	aquaculture submissions
Sent	Thursday, 23 March 2017 3:56 PM
Attachments	<<salmon farming23032017.pdf>> <<salmon farming 123032017.pdf>>

To the Right Honorable Nathan Guy:

Please find my submission to the Marlborough Salmon Farm Relocation Advisory Panel.

Regards

Jean E Loomis.

## Written Comment No: 0314

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

Email before 5pm, Monday 27 March 2017  
to:  
[aquaculture.submissions@mpi.govt.nz](mailto: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		Jean E Loomis	
Address		[REDACTED] Blenheim Marlborough	
Email		[REDACTED]	
Telephone (day)		[REDACTED] Mobile	
✓	I am against the whole Ministry for Primary Industries (MPI) proposal for "Potential Relocation of Salmon Farms in the Marlborough Sounds"		
*	I would like to speak to my written submission at a public hearing in Marlborough		
	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).



## ***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 calling this 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 Comments:**

My husband and I are new residents to Marlborough, we moved here last year from Gisborne. At first we were really pleased to be able to buy fresh salmon locally but then I discovered the current methods used for farming these fish. Their food has added red dye in order to give the flesh a salmon colour and the conditions under which they live is the equivalent of caged chickens on land. As a result I no longer buy King salmon. So, I was disturbed to hear about the potential increased development of salmon farms in the Sounds from the existing 3 to the building of 6 more.

This area is historically significant as an early landing site of Cooks Endeavour + the location of very early Polynesian/Maori settlement. Today there is increasing tourism interest with cruise ships discovering the breathtaking natural environment of these bays with its aqua sea. The existing farming methods used by King Salmon are damaging the eco system of the Sounds and added developments will create a further degraded environment destroying a place of natural beauty.



# Written Comment No: 0190

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

Email to:  
[aquaculture.submissions@mpi.govt.nz](mailto: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  
Address

ERIKA ELISABETH LOTTERMÜSER

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 checked="" 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).

## ***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:

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

6.3.17

*E. Loffemans*



# Written Comment No: 0191

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

Email to:  
[aquaculture.submissions@mpi.govt.nz](mailto: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  
Address

EUGEN ADOLF LOTERMOSER

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 checked="" 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.

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Other objections:



06/03/2017

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

## Written Comments No: 0264

Subject	Submisson
From	[REDACTED]
To	aquaculture submissions
Sent	Monday, 20 March 2017 11:55 a.m.
Attachments	<<Salmon Farm relocation Submission - Grant Lovell.docx>>

Please find attached a submission on the salmon farm relocation.

This is a personal submission from myself and I do not need to be heard at the public hearing.

Many Thanks

Grant

**Grant Lovell**, *Seawater & Aquaculture Production Manager*



M: [REDACTED] | W: [www.kingsalmon.co.nz](http://www.kingsalmon.co.nz) | A: 43 Dublin St, Picton 7220



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

Submission response

Grant Lovell



This is a personal submission and is not on behalf of any organisation or company.

I do not need to be heard 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 is a logical approach that will provide a positive outcome for all parties including environmental outcomes as well as social and economic outcomes.

#### Question 2:

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

All are suitable due to the water flows and depths of the sites, the process has been extensive to ensure that this is well covered

#### Question 3:



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

Initially the key sites to relocate should be the ones with the poorest environmental record or are so poor that they are unable to be used in an economical fashion. Additionally the ability to meet bmp guidelines should be taken into account, This would mean the priority sites to move should be Crail Bay first and then Forsyth, followed by Otanerau. Ruakaka and Waihinau.

**Question 4:**

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

I have no concerns around the new sites. The mid channel site will require very good navigational lights in place but the boat traffic out there and over the location id very low.

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**Question 5:**

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

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The cost of relocation will be very large to the industry as the infrastructure required for the new farms would need to be all new however the long term benefits should outweigh the costs. The removal of Ruakaka will create a very clean sound without marine farms which can benefit the tourism industry.

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**Question 6:**

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

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No, the conditions are very robust and represent a highly regulated industry

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**Question 7:**

Provided that detailed standards and requirements are met, do you agree that salmon farming on the potential relocation sites should be a restricted discretionary activity?

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YES

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**Question 8:**

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

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No – I have seen good evidence to suggest that the total surface structure area could not be increased, and there may be a case for future expansion especially if some of the sites are able to take an increased feed discharge and maintain bmp guidelines. If the industry can sustainably grow then it should be supported and enabled to do so, and added a pen or 2 to sites would be the simplest and least intrusive way for this to occur.

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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?

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This could be decided on a site by site basis, Crail bay, Forsyth, Waihinau, Otanerau are in areas of significant mussel farms and could be converted to mussel farms or gifted to iwi for marine farming but they cannot remain salmon or finfish farm.

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**Question 10:**

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

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As above – no problem with shellfish farming being allowed on this site. It is surrounded by mussel farms now.

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**Question 11:**

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

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Yes, however the current stages seem to be too small (feed increase are very small and very long apart) and do not fit with what is practical in terms of farming fish. They also do not link with what I would call adaptive mgmt but rather set out a precautionary principle approach in which volume is very slowly increased. Additionally the feed volumes do not allow for the natural variations of fish farming and annual / biological variation. also do not link completely with best practice. If a farm was set up as an all in / all out farm it would to reach the requirement to grow the discharge as every second year would be too small. It may be better to link some of this to the grow out cycles of fish or 2 yearly averages,

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**Question 12:**

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

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Mainly around the staged feed approach as discussed above.

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**Question 13:**

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

No

**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?

Clearly the sites that will not be able to farm economically at the proposed bmp guidelines should be the priority to be relocated as this process is about ensuring best environmental and economic outcomes for the region. Therefore the order of priority should be

1. Crail Bay X 2
2. Forsyth
3. Otanerau
4. Ruakaka
5. Waihinau

This differs from the MPI order which is of concern as it would seem a wasted opportunity if the industry has the better low flow sites removed and were left with potentially uneconomic sites.

**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?

This is really a one off opportunity to provide appropriate space for the finfish industry in Marlborough and improve the environmental and economic outcomes for Marlborough. Failure for this to occur will could result in a reduction in size of the industry.

Salmon farming in the Marlborough sounds is a great success story as we sell the world best fish around the globe to discerning customers. It epitomises what we are trying to achieve in the export sector and this process will give the industry the opportunity to grow over the coming years and provide more jobs and diversification within the Marlborough economy.

**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?

No – the sounds are actually quite a modified landscape and the impact of the farms on the visual aspect of the sounds is incredibly minor.



**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?

No – this report is very comprehensive and the mitigation levels appropriate

**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?

No further measures required

**Question 19:**

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

The water quality impacts are likely to be very minor to non existent, current farms do not have a significant impact on water quality and with the tidal flow in the relocated sites the impacts will be even smaller

**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?

The sites should be developed faster, the current feed stages are so small that the differences will be very hard to detect, larger changes in inputs will allow a greater certainty around any changes, this could be offset by ensuring the total change in the region is managed.

**Question 21:**

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

No – currently the proposal requests significant information on many areas and in some cases this may be to much, for example total nitrogen is generally renowned as the best measure for nitrogen yet the proposal also includes Ammonium, nitrous oxide and nitric oxide which are of course components of total nitrogen and it therefore makes no sense to measure these separately due to the complexity and cost of this.

**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?

No further information required – see above regarding comments on Nitrogen

**Question 23:**

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

This process is designed to improve the environmental impacts and both moving sites to area of improved flow and depth the seabed impacts will be greatly reduced which is a positive for all parties.

**Question 24:**

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

A staged approach is already in place and this needs to be reduced as it takes 15 years in some instances to reach full proposed production – there will be impacts but the site locations are designed to minimise these due to flow and depth. BMP guidelines can take care of any remediation issues.

**Question 25:**

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

NO

**Question 26:**

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

NO

**Question 27:**

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

NO



**Question 28:**

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

All locations have the potential to interact with seabirds, and I am not aware of one site have a greater impact than others

**Question 29:**

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

No as the farms are managed to avoid interactions with marine mammals, seals are by far in away the mammal that has the largest interaction with farms and predator nets are designed to keep these out of the farm.

**Question 30:**

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

Not that I am ware of

**Question 31:**

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

Only if this is standard practice for all other farming industries, including land and sea based farming activities.

**Question 32:**

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

It is well known that low flow, warm water sites can have an adverse impact of salmon, the movement into high flow sites improves the conditions by ensuring a higher water exchange rate and improved oxygen conditions , this in turn improves overall fish health.

**Question 33:**

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



NO

**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?

This site has more than 1km of space on each side, will have good radar reflectors in place as well as navigational lighting. This could in fact add value to these vessels by allowing discussion and even demonstrations, linking back to the chefs, restaurants on board.

**Question 35:**

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

There is no reason why the salmon industry can not be a positive contributor to the tourism industry linking in with boats for site visits, providing samples for salmon and wine tastings etc. There is still a very very large area of the sounds with any marine farms if this is what is required, the proposed new salmon farms will be in areas where many marine farms already exist so will not have any negative impact.

**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?

As above – impact is not overly negative, in terms of recreation ( e.g fishing) a salmon farm does not have a negative impact on stocks so this amenity is not reduced.

**Question 37:**

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

No

**Question 38:**

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

All industry will make some noise and the proposed consent conditions include noise limits



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**Question 39:**

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

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No – lights have in use at NZKS sites as well as Sanford in Stewart Island for many years without any significant impact, these lights allow year round production and without these there would be a significant impact to the industry.

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**Question 40:**

Social and community effects of the potential relocation proposal are wider than just residential amenity. What effects do you think there will be as a result of the potential relocation proposal?

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This is clearly a positive as it will create more employment in the top of the south, provide more certainty for the industry allowing more investment and potentially more sponsorship of local groups and organisations.

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

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Overall I fully support the proposal to relocate the farms, it is not perfect but overall I feel it strikes the best balance and will improve the environmental and economic outcomes of farming salmon in sounds.

As someone who has been employed in the industry for nearly 20 years I am very passionate about the industry and also very proud of what I do. Salmon farming in NZ is a great example of a sustainable industry producing very high quality products and exporting them to the world “the finest seafood money can buy”. The industry needs support to grow in a sensible and sustainable way and this process allows it to happen.

As an active member of the Marlborough community I want see all industries flourish but in a sensible and managed fashion that protects the environment.

I want my Children to be able to have choices when they grow up and options to remain in the region in their chosen profession, the ability to have multiple successful industries in the region is key to this and the support services that these industries support.

This opportunity really appears the last chance to get it right and set up the industry for a prosperous future, I have quite a few fears of the long term outcomes if this does not go ahead, it will be another missed opportunity for Marlborough.

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