



POTENTIAL RELOCATION OF SALMON FARMS IN MARLBOROUGH SOUNDS

SUBMISSION IN RELATION TO 497

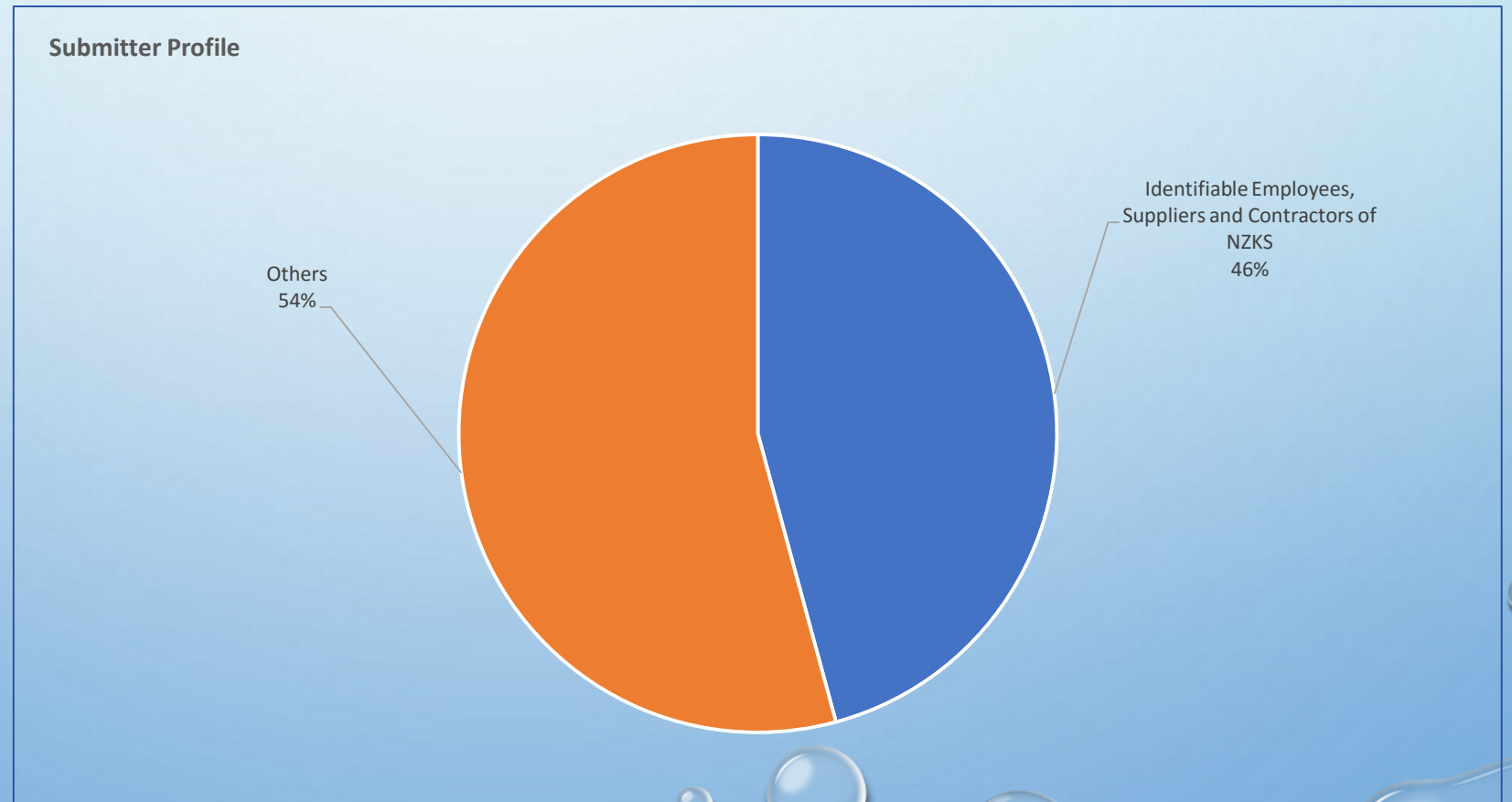
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REGULATION AND ALL THAT

- NO DOUBT THE MINISTER HAS THE POWER TO ISSUE REGULATION
- THE **USE** OF REGULATION IN THIS INSTANCE IS QUESTIONABLE
- THE **NATURE** OF THIS PROPOSAL TO BE IMPLEMENTED BY REGULATION IS PECULIAR, ANTITHETICAL TO BEST PRACTICE, AND ANTITHETICAL TO FUNDAMENTAL ECONOMIC AND POLICY PRINCIPLES
 - NO INDICATION OF MARKET FAILURE
 - NEITHER PROTECTIVE NOR PRECAUTIONARY
 - ANTI-COMPETITIVE, INEFFICIENT AND ALMOST INEVITABLY DISTORTIONARY – THERE ARE OTHER COMMERCIAL INTERESTS
- THE **ENVIRONMENTAL RATIONALE** FOR THIS PROPOSAL SUGGESTS:
 - NON-COMPLIANCE IN EXISTING SITES; AND/OR
 - A LACK OF KNOWLEDGE AROUND COMPLEX BIO-PHYSICAL DYNAMICS; AND/OR
 - ORIGINAL DECISIONS WERE GENERATED OUT OF MISLEADING ARGUMENT.

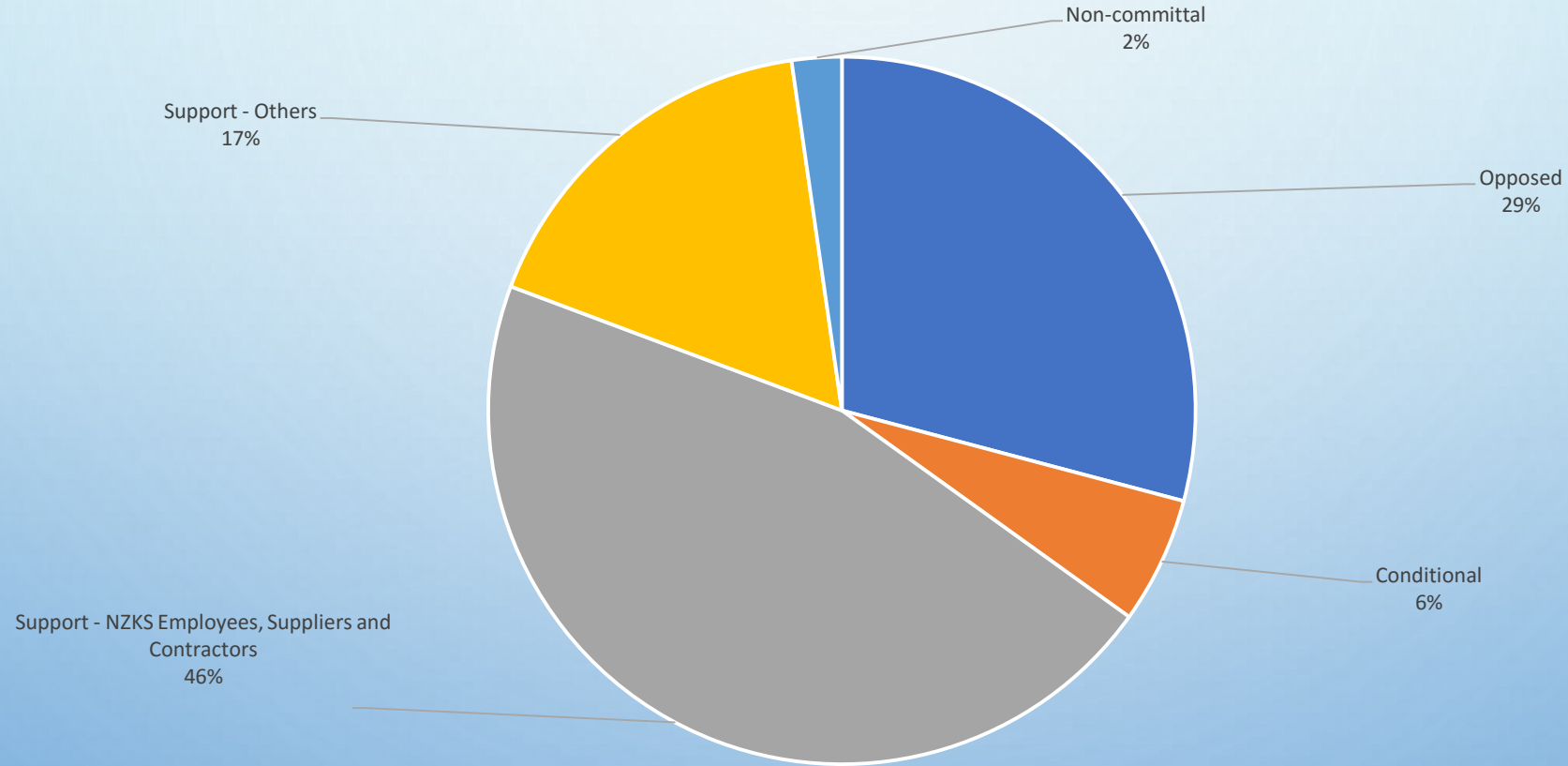
CHALLENGING FOR THE MARLBOROUGH SALMON FARM RELOCATION ADVISORY PANEL

MADE MORE DIFFICULT BECAUSE OF THE VERY HIGH PROPORTION OF SUBMISSIONS BY PEOPLE WITH DIRECT FINANCIAL INTERESTS IN NZKS



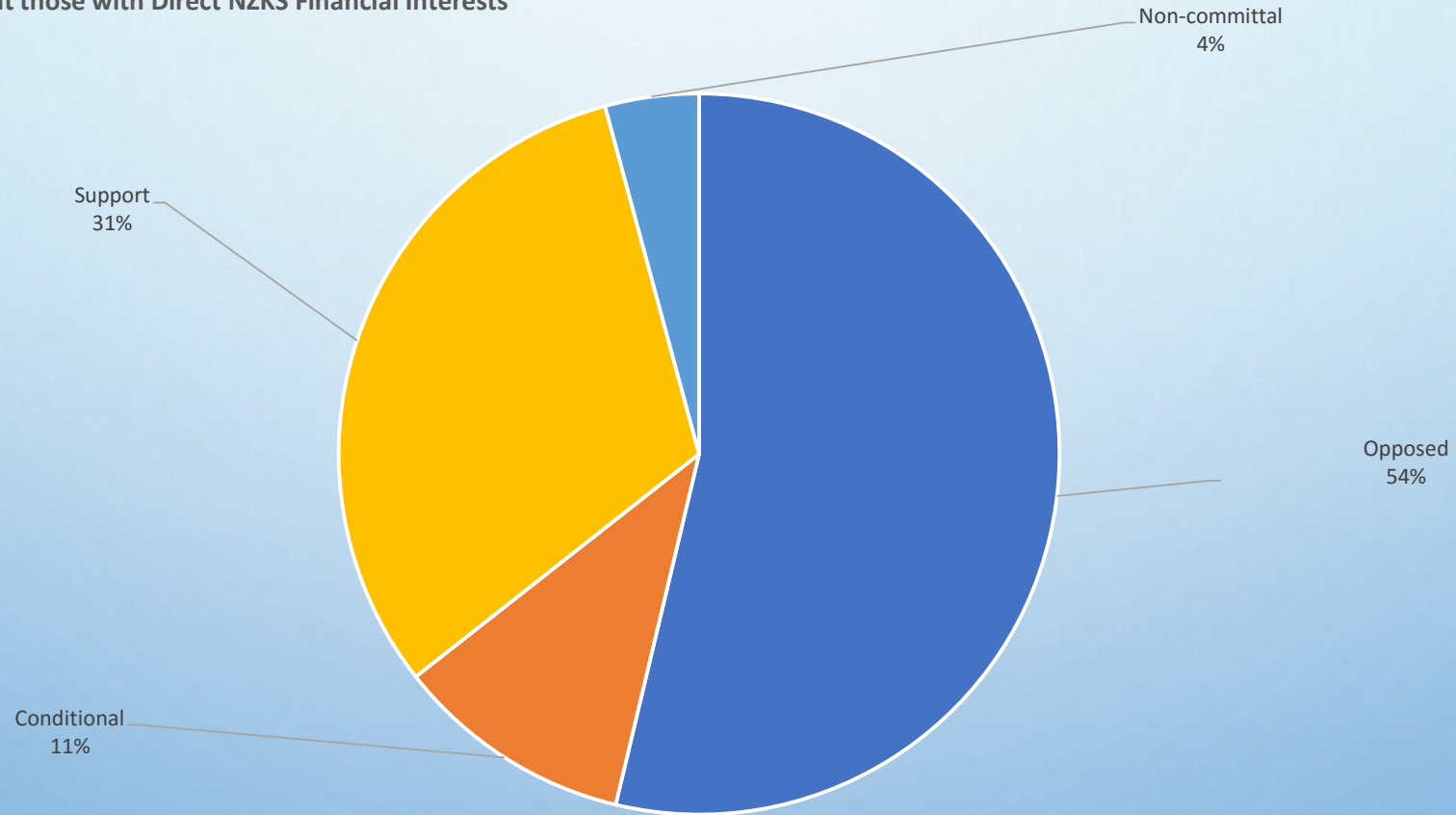
DIRECT FINANCIAL INTERESTS IN NZKS IMPACTS ON THE SUPPORT PROFILE OF THE SUBMISSIONS

Fors and Againsts - Including those with Direct NZKS Financial Interests



DIRECT FINANCIAL INTERESTS IN NZKS IMPACTS ON THE SUPPORT PROFILE OF THE SUBMISSIONS

Fors and Againsts - Without those with Direct NZKS Financial Interests



THREE KEY ISSUES

- MARLBOROUGH SOUNDS IS UNIQUE WITH MULTIPLE USES:
 - POOR ANALYSIS OF THE IMPACT ON OTHER ECONOMIC ACTIVITIES IN THE SOUND INCLUDING NAVIGATION IMPACTS AND POTENTIAL FOR CHANGING THE COST STRUCTURE OF OTHER OPERATORS
- PRECAUTIONARY APPROACH DEMANDS PRECAUTION UNLESS:
 - CLEAR AND UNEQUIVOCAL SCIENCE SAYS GO AHEAD – **SCIENCE HAS BEEN HEARD AND CONSIDERED THROUGH LONG PROCESSES AND THERE IS NO EVIDENCE THAT THE SCIENCE HAS CHANGED MATERIALLY**
 - DEMONSTRATED TRACK RECORD SHOWING CAPACITY, CAPABILITY AND WILLINGNESS TO MONITOR COMPLIANCE AND USERS TO MEET COMPLIANCE – **BOTH ARE VERY DOUBTFUL**
 - DEMONSTRATED ABILITY TO IMPOSE EFFECTIVE RESPONSES TO REMEDY NON-COMPLIANCE – **VERY DOUBTFUL**
 - ABILITY TO REMEDIATE IMPACTS AND RETURN ENVIRONMENT TO CONDITIONS PRIOR TO USE – **VERY DOUBTFUL**
- THIS PROPOSAL SUGGESTS RELOCATION IS A SWAP BUT THIS IS MYTHICAL
 - NON-PRISTINE SITES ALREADY DEGRADED BY THE ACTIVITY TO BE RELOCATED FOR PRISTINE SITES

UNCOMFORTABLE SILENCE

- REMEDIATION OF CURRENT SITES
- MECHANISMS TO ADDRESS LIABILITIES AROUND NEGATIVE ENVIRONMENTAL IMPACTS
 - THROUGH NON-COMPLIANCE
 - UNFORESEEN
- MECHANISMS TO ADDRESS COSTS OF ENVIRONMENTAL MONITORING
- ECONOMIC IMPACTS OF A PROPOSAL WHICH IS FUNDAMENTALLY ANTI-COMPETITIVE
 - THOSE REPORTS PRESENTED AS ADDRESSING THE ECONOMIC IMPACTS DO NOT DO SO
 - DISCUSSION PAPER INDICATES BENEFITS IN KEY INDICATORS MAY BE 0 WITH NO SENSITIVITY ANALYSIS OR STATEMENT OF CONFIDENCE