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

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Written Comment No: 0392

Subject	Submission; Re potential relocation of salmon farms in the Marlborough Sounds.
From	Peter Beech
To	aquaculture submissions
Sent	Monday, 27 March 2017 1:16 PM
Attachments	<<Takutai's submission to relocation of Salmon farms 2017.docx>>

To whom it may concern,
Noho Ora Mai,
Takutai Beech.

Potential Relocation of Salmon Farms in the Marlborough Sounds

COMMENTS FORM

Comments closes 5pm, 27 March, 2017

Your details

NAME:

ORGANISATION (if applicable):

CONTACT PERSON:

POSTAL ADDRESS:

EMAIL:

DAYTIME PHONE:

MOBILE:

YES I would like to speak to my written comments at a public hearing

NO I do not want to speak to my comments at a public hearing

Comments sent to: aquaculture.submissions@mpi.govt.nz

DATE:

I OPPOSE the relocation proposal for the following reasons:

Issue	Comment
1. Process	<ul style="list-style-type: none">• The use of Section 360A of the RMA gives the Minister of Aquaculture the power to over-ride the Marlborough Sounds Resource Management Plan.• It takes decision-making and resource management away from the Marlborough District Council and local community.• It disregards the 2013 Board of Inquiry [BOI] and 2014 Supreme Court decisions about expansion of salmon farming into prohibited areas of the Marlborough Sounds.• The proposal provides commercial benefit for one company, using public water space for free, above the interests of other users of the Marlborough Sounds, including iwi.• It sets a precedent for the Minister to make similar water-grabs around New Zealand, usurping the power of local authorities and wishes of local communities.
2. Precautionary approach	<ul style="list-style-type: none">• Policy 3 of the NZ Coastal Policy Statement calls for a precautionary approach. This was reinforced by the BOI decision [par 179].• The three new high flow sites granted by the BOI are only just coming on stream. It would be precautionary to wait until monitoring shows the company can operate these sites, along with their other high-flow sites, to comply with the Benthic Guidelines at maximum feed levels for at least three years before any more space is considered. [consistent with BOI Condition of Consent 44a]• This especially applies to Tio Point, which would be the fourth salmon farm in close proximity in Tory Channel.• In the meantime reduce the feed and stocking rates at the low flow sites to meet the Benthic Guidelines.

<p>3. Nitrogen pollution</p>	<ul style="list-style-type: none"> • We dispute the accuracy of Minister’s statement: “This proposal is about making better use of existing aquaculture space. There is no proposed increase in the total surface structure area used for salmon farming in the Marlborough Sounds,” – Nathan Guy, Minister of Aquaculture. • The proposed relocation sites are not “existing aquaculture space”. They are prohibited to aquaculture. • While farm surface area may remain about the same, there is a proposed five-fold increase in fish feed to 24,600T a year. • With more feed and more fish, the amount of nitrogen pollution discharged into the Sounds through salmon faeces would also increase. The high-flow farms would be discharging the equivalent of the nitrogen in sewage from a city the size of Christchurch, straight into the sea.¹ • Residents must meet strict obligations to keep waste out of the enclosed waters of the Sounds. Yet this proposal would allow the untreated discharge of polluting nutrients from six new salmon farms. • As a land-based comparison of low flow and high flow sites, it is not OK for a dairy farmer who has been pulled up for discharging effluent into a small stream to resolve the issue by increasing his herd and discharging to a faster river.
<p>4. Offshore Alternatives</p>	<ul style="list-style-type: none"> • The NZKS Supreme Court decision ruled there was an obligation to consider alternatives under the NZ Coastal Policy Statement and Section 32 of the RMA. “Particularly where the applicant for a plan change is seeking exclusive use of a public resource for private gain.” [SC 172-173] • Having salmon farms offshore (open ocean aquaculture) rather than in the confines of the Marlborough Sounds would dilute the pollution and remove the conflict with other users. This approach is being used in countries such as

¹ BOI [par 379] Nitrogen equivalent calculations

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	<p>Norway.</p> <ul style="list-style-type: none"> Offshore alternatives are barely mentioned in this proposal. NZKS claims it would be achievable in 10 years but was too expensive and not yet proven. There is no information about what is happening in other countries and no cost-benefit analysis about off-shore alternatives. Rather than pushing this relocation proposal for areas prohibited to aquaculture, MPI and the industry should invest in research to expedite offshore farming as a future-proofed alternative.
5. King shag	<ul style="list-style-type: none"> Policy 11 of the NZ Coastal Policy Statement calls for protection of indigenous species in the coastal environment. The NZ King Shag is classified as nationally endangered and is found only in the Marlborough Sounds. It is a taonga for Ngati Kuia and Ngati Koata. King Shag are sensitive to disturbance when breeding, roosting and feeding. Duffers Reef to the Waitata Reach, where five new farms are proposed, are key areas for these activities. The threat to King Shag was a factor in the BOI restricting the number of new farms in the Waitata Reach to two in its 2013 decision [BOI 1252]. Yet this latest proposal is seeking another five farms in the King Shag foraging area.
6. Landscape and Cumulative effects	<ul style="list-style-type: none"> This proposal will degrade the Outstanding Natural Landscapes and High Natural Character values of the Waitata Reach. ² The Board of Inquiry decision identified the threshold number of salmon farms for Waitata Reach as TWO – Waitata and Richmond – and turned down three others because of the cumulative effects on Landscape, Natural Character, King shag feeding and Tangata Whenua values. [BOI 1252] NZKS and MPI have ignored this ruling, which was arrived at after a long and considered judicial

² Marlborough Landscape Study August 2015 by Boffa Miskell and Marlborough District Council, page 108; Natural Character of the Marlborough Coast, Defining and Mapping the Marlborough Coastal Environment, June 2014 by MDC, Boffa Miskell, DOC, Landcare Research and Lucas Associates, page 75.

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	process. Instead they have joined forces and put forward this relocation proposal for FIVE more farms in the Waitata Reach. None of these farms can be justified.
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Further comment:

Disappointed at the Board of Enquiry 2013 where it was said the Treaty of Waitangi was just a distraction this showed disrespect to Maori the environment and the Treaty of Waitangi (TOW) which is acknowledged as our founding document and is in statute s.6, s.7, and s.8 of the RMA. I would like the decision makers to give genuine recognition to Maori the environment and TOW in this process 2017.

Chinook Salmon is not a natural fish species to NZ and so it is not a natural resource. This application will further impact on our abilities to mahinga kai re from pollution, the escapee salmon (and they do) will impact on our native fish stocks as they are at the top of the food chain and our community rate payers/ tax payers will be left to clean up and pay for the mess made by this private company.

The marketing gurus of king salmon say they need to feed the worlds growing population they are marketing to the wealthy as a premium product but they have converted bait fish of South America food of the poor people into fish meal for salmon to feed the wealthy people. If they just market "come buy our chinook salmon" there would be no buyers but because they promote their salmon as grown from the clean waters of the Marlborough sounds they get buyers" and knowing they are not sorting out their pollution issues in our sounds and moving the farms around is not going to fix it.

In conclusion:

There should be no discussion of more salmon farms in the Marlborough Sounds until NZ King Salmon shows it can operate the ones it has within the agreed benthic guidelines.

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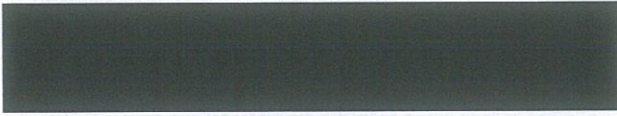
Desired outcome: Option C: The Minister does not recommend the proposed regulations.

Written Comment No: 0394

Subject	Submission; Potential relocation of salmon farms in the Marlborough Sounds.
From	Peter Beech
To	aquaculture submissions
Sent	Monday, 27 March 2017 4:33 p.m.
Attachments	<<submission to MPI against the King Salmon application. 2017.docx>>

To whom it may concern.
Noho Ora Mai,
Pete Beech.

Peter Beech (Patron of Guardians of the Sounds)



Yes I will speak to this submission.

It is with a heavy heart that I make this submission, over 20 yrs ago I formed an environmental watch dog group called "Guardians of the Sounds " to try and protect the natural resources of our Sounds and protect the rights of the Sounds Community.

After 20 yrs of advocacy work you would think that the govts role in Sustainable Management of the Sounds would of improved out of sight.

You have gone from being the ministry Of Fisheries , where you did a terrible job of managing our fisheries resource to now calling yourselves MPI, you have formed a virtual partnership with the Foreign owned multinational "King Salmon. " along with Te Atiawa Trust.

You know as well as I that what you should be doing is creating a long term Sustainable, Holistic, management plan for NZ's native fish stocks, that will guarantee healthy fish stocks into the future . Your individual quota system is fundamentally flawed in that it focuses on individual species rather than a holistic model , and it will fail.

When the native fish stocks are all gone you plan to replace them with farmed fish ! and you plan to legislate to make the Sounds into one great big aquaculture growing area.

The really sad thing is that you know full well that it will become a polluted , diseased, cess pit within 20 yrs. It doesn't worry you because you like the fishermen, bottom scallop dredgers, divers, sealers, whalers, forestry industry, farmers, freezing works before you will create a mono culture farming Salmon that will give good returns initially but will be non Sustainable long term.

The current fisheries management is failing because of competition greed and corruption, your fish farming model will fail because of pollution and disease.

My whanau have lived, worked, fished, farmed and built boats in the Sounds for 7 generations, collectively we have experienced all of the failed monocultures, for the last 30 yrs we have kept a very close eye on Salmon farming both here and around the world.

Everywhere they have farmed them in sea cages intensively they have been an environmental disaster, and here is no different. It is the same water, the same fish, same methods, same feed.

How can a government in this day and age with all your educated staff, environmental advisers, scientists, Agency staff, like DOC, MOE allow a rot like this to happen .

We like to think that our great grandfathers didn't know what the effects of deforestation of the Sounds would cause or the hunting of the southern Right Whales would lead to their virtual extinction. But you do , you know exactly what is going to happen as a result of this application.

We are so tired of reading the lies from King Salmon , they argued for years that their farms where sustainable, no pollution, no disease, our farms don't cause algy blooms. They wont prevent you from gathering Kaimoana, our industry wont affect your customary or recreational fishing or diving areas, your people wont get sick . diseased salmon wont infect native fish stocks.

They are still saying that their farms are fully assimilative, rubbish ,the bottom under farms that were closed 15 yrs ago are still black oozy muck, that nothing can live in, we are sick of their lies And we are ashamed that a responsible well informed government could ignore decisions made by the high court, blaze ahead by moving these farms and increasing the amount of feed 5 fold without waiting for results on the environmental impact of the latest high flow farms and conspire with a multinational company and take away our democratic rights.

companies scientists and expert witnesses are nothing but paid lairs, you are saying that the farms are unsustainable in low flow sites, contrary to all the King salmon dogma that the Ministry Of Fisheries and MDC has accepted as gospel all these years.

Your belief that moving farms into high flow sights will make the industry sustainable is mislead and potentially disastrous for the Sounds Eco system.

These farms shouldn't be allowed in the Sounds full stop, but in some ways the low flow sites are the better of the two evils, in a low flow site the waste falls to the bottom , this forms an anaerobic build up underneath the farms that in time give off methane gas, phosphorous and other toxins that eventually become anoxic, the lack of oxygen kills their own fish.

If you move those farms into high flow sites, only 10% of the waste falls to the bottom the other 90% gets distributed all around the sounds by the flood tide. In 6 hrs a toxic algy bloom will travel the length of the Sound. This has been proven. The nitrogen enrichment will result in the only creatures living in the Sounds will be Algy blooms and jelly fish, you will be creating a Dead Zone, this has happened in the Adriatic, The Gulf of Mexico, The Sea Of Japan, why would it not happen here.

The other risk is that shown in other countries is the increase in acidification that could have a serious impact on the shells of our Kaimoana and threaten the whole paua industry.

It is wrong for a government that has a duty of care to provide for the health and safety of its people to allow an industry to operate and develop that has knowingly caused paralytic algy blooms capable of causing peoples diaphragms to seize and their lungs to stop, these people could die from eating contaminated kaimoana.

If this happens and the Ministry of Health have prior knowledge are they not responsible.

I told the Ministry of Health who had erected a sign in Waikawa that said If you eat shell fish you could get sick . I told them that they should change the sign to say that "If you consume kaimoana contaminated with Paralytic Algie bloom you could DIE ! "

Every year for the last five years we have been unable to collect Kaimoana over the summer months because of Paralytic algy blooms. If Te Atiawa Trust wasn't partnered up to this company they should be enraged about losing the fundamental traditional right to gather Kaimoana and the lost of yet another popular fishing and diving spot to another massive fish farm which will destroy all the native ecology for hundreds of metres all around it.

What you don't appreciate is that Totaranui is like a washing machine bowl, the tide will spread the nitrogens and toxins to every part of it, Cancer although concentrated in one area of the body will eventually kill the host.

Does the 2nd article of the Treaty of Waitangi not say, "Full Exclusive and UNDISTURBED possession of lands forests and fisheries ! A company that is knowingly poisoning our kaimoana and our community is in contravention of Article 2 of the Treaty of Waitangi.

At the EPA Hearing in 2013 the Judge told us that our references to the Treaty of Waitangi were

" Nothing but a distraction, " This was a terrible insult to Maori, did he say this because of a lack of understanding about Te Ao Maori / (Maori world view of the natural world,) or was it because he felt that The Treaty Of Waitangi has no basis in the law and he wasn't obligated to give regard to it.

The treaty is mentioned in over 30 acts, The main one being the Conservation Act 1987 section 4.

"This act shall be so interpreted and administered as to give effect to the principals of the Treaty of Waitangi." Local Maori strongly support the concept of Kaitiakitanga as defined by section 2 of the RMA 1991- " The exercise of guardianship, and in relation to a resource, includes the ethic of stewardship based on the nature of the resource itself."

Chinook Salmon is not a native species , but the adverse effects of Salmon farming have a very real potential to threaten our Mahinga kai , native fish stocks and threaten the health and safety of our community.

Section 8 of the RMA says " shall take into account the principals of the treaty of Waitangi. "

Section 6 e requires decision makers to " recognise and provide for the relationship of Maori and their culture and traditions with their ancestral lands water, site wahitapu and other taonga.

Section 7, sets out persons exercising functions and powers under the act are to have particular regard to including Kaitiakitanga

Under the Treaty of Waitangi (fisheries claims,) settlement act 1992 " it states, May be seen as an affirmation of customary rights that would other wise be recognised by the common law. ""

I have included this because, if as a court you feel that you are not required to acknowledge the Treaty of Waitangi or just see it as a "Distraction, " please pay recognition to our customary rights to be able to gather kaimaona and fish(without getting sick) and to help feed our kids and be able to swim in clean unpolluted water that is recognised by international and customary law, if not in LAW but in LORE.

We have shared our LORE, (Oral histories,) before with the EPA, who took no notice.

The old people had a holistic view of the Sounds ecosystem, they believed that all of the elements the air, the bush, the sea, the river deltas and lagoons , the tide the fish , kaimoana all had a life force and that they where all dependant on each other for mutual survival.

They called the Sounds Totaranui, the emphasis is on the word Tara which is a womens private parts, the name meant that the Sounds was their mother, and Tory channel was the Mothers womb, the high peak directly behind the channel Entrance was called Raiatea, the penis that fertilised the womb.

The Bay called Onapua , the Pua is the receptacle for life where the seed is germinated , isn't it interesting to learn that it is from this bay where they believe the Algy blooms originate.

This middle section of the channel was the most densely populated by Maori over the Summer months, where they were actively involved in gathering and storing enough kaimoana to carry them through the winters.

They lived in bays on both sides of the middle sections of the channel their pa sites were called Kaihinu, and Moioio Island, because these bays and headlands are much more sheltered than the exposed bays at either end like Okukuri and Maraetai/ Dieffenbach where the Southerly storms become extremely violent.

Of course the same applies today, and that central section of the channel was the most favourite fishing spots for customary and recreational fishermen.

The MPI have taken it upon themselves to make The channel into a salmon farming / aquaculture growing area, to the detriment of our Sounds communities rights to customary and recreational fishing and diving.

Remember that there are thousands of people today who are descended from Maori who lived in Tory channel and Arapawa Island, also hundreds who descend from whalers and fishermen from Tar White.

There are also very significant Urupa like Moioio Island where over 300 souls were slaughtered during the musket wars and the grave site of Huriwhenua, one of Te Atiawas paramount chiefs.

Don't take it for granted that because Te Atiawa Trust has thrown their hand in with King Salmon that local whanau Hapu agree with it, at the last EPA hearing, Whanau Hapu called iwi hui where they were given a clear mandate to tell the Te Atiawa Trust to oppose their own partners.

They were told by the Trust that when the people voted them onto the Trust they had given them a mandate to make independent decisions.

King salmon were very clever in being able to convince Te Atiawa to join them as partners, this court needs to acknowledge that Te Atiawa are just one of 8 Iwi in the Top of the South.

I guarantee that in the future local Maori who have been disenfranchised by their own Iwi trust will turn on them. Nothing is more important to Maori than their rights to be able to harvest fish and kaimoana, especially for weddings, 21'sts, tangi at the Marae, this marriage with King Salmon will end badly for Te Atiawa Trust, already the chairperson has been forced to step down.

It wont be long before local Maori will need to go to the supermarket to buy their Kina and mussels.

The new Salmon farm at Ngamaho will pollute and destroy the best cockle bed in NZ in the bay directly to the South of the farm, the EPA refused to listen to our warnings about this.

I am a 5th generation Soundie, I have lived in the Sounds my entire life, I've never been anywhere, I'm 60 yrs old and have spent my life plying these waters, for the last 25 yrs I have been a commercial skipper first working as a commercial fisherman then skippering commercial tourist boats and water taxis. For the last 20 yrs my wife Takutai and myself have been running an ecotour operation in the Sounds and Tory channel.

After spending a lifetime studying the ecology of the Sounds I whole heartedly agree with the Maori analogy of the Sounds being the Mother and the Channel being the mothers womb.

You need to look at the big picture, ocean water being swept all the way by southerly storms all the way from Antarctica, rich in Zoo plankton and phytoplankton, when it reaches Cook Strait it is forced

into a funnel, Tory Channel leads directly off Cook Strait. Phytoplankton nets that we have dragged around in Tory Channel entrance called Kura Te Au show that the strong tidal flow is rich in Zoo and Phytoplankton.

This is spat or fish eggs that sweep up the Kaikoura Coast , they have a high oil content which evaporates over 3 days and when they reach the Channel they sink to the bottom. When the fish and Kaimoana spat in Tory channel it is carried by the flood tide and distributed all around Tootaranui.

Before the Fast Ferries trashed it, Tory channel was regarded as the most productive area of fish and Kaimoana in NZ.. What I want to make sure is that you understand that , If there is one area of Tootaranui that you should protect over all others its Tory channel, The Mothers Womb, if The ecology of the Channel dies , which it will with intense aquaculture the the egology of Tootaranui will die with it. Be clear on that point it is very true !

The Sounds ecology has reached a tipping point, there are only 20 Hector Dolphins left who dwell permanently in the Sounds, and for the last 4 yrs the bottle nose Dolphins have disappeared all summer long.

When the flood tide leaves tory channel and enters Tootaranui it sweeps straight across to the other side where the Ruakaka Salmon farm is sited, on Bull head there is one of only 3 King Shag roosting sites in Tootaranui, we know that the algy blooms caused by salmon Farming are disastrous for the King Shags. The shags are bottom feeders and feed in the tidal flow that sweeps across between Dieffenback and Bull head.

We take out a lot of bird watching parties , our tourism industry would suffer greatly from the loss of these wonderful birds, we have known people to travel all the way from Europe just so they can tick that box.

There are already too many salmon farms in Tory channel for the ecosystem to be able to assimilate.

There are lots of issues over shipping, sedimentation caused by Forestry, bottom dredging for scallops and collapse of the fish stocks. You people are making management decisions about things you and your scientists know nothing about, be very careful, the Sounds ecology is in a state of collapse. Don't tip it over the edge with misguided belief in short term gain.

I see the ecology going thru its paces every day , the Maori people in whanganui are asking people to think of their Awa, the whanganui river as a living entity. That is a wonderful concept , think about the analogy with the Sounds and ask yourself if you are making the right decisions. (would you disrespect your mother.

As a tourism operator who over 20 yrs has taken thousands of foreign tourists and thousands of kiwi school children around the Sounds, let me tell you that the foreign tourists are all well aware of the pollution and disease issues with Salmon farming and they don't want a bar of them, they don't want to be taken to look at them and they don't like talking about them, they have travelled to the bottom of the world to look at our pristine nature show.

In the last 2 months We have taken out 12 school classes who are wanting to learn more about the sustainability of salmon farming in the Sounds, there is a big public backlash from the people of Marlborough, to this proposal, interesting that now its coming from the schools

You have allowed our fresh water rivers and streams to become terribly polluted, don't do the same to our beautiful Sounds. We have stripped her of all the whales and seals, we have filled in all the lagoons and dredged out the deltas where the baitfish bred, With no breeding grounds left there is no Bait fish to entice the enormous pods of pilot whales that used to come into the Sounds in my grandfathers time.

We have deforested the hills, for their 2000 yr old podocarps, pastoral farmed for 150 yrs, now covered the hills with exotic pines, the sedimentation from which has smothered all our kaimoana beds and kelp beds.

The wilding pines eradication has cost NZ and the local community millions of dollars to remove with no help from the forestry industry.

Don't make the same mistake with yet another mono culture , we know that salmon farming will fail, and we know that when it does it will be left up to the Sounds community to clean up the mess.

Finally, the thing that I am extremely concerned about is MPI taking the management rights off our local government in regards aquaculture.

Many of us stakeholders have spent yrs now consulting on our Sounds plan, then you come along and tell our council that you are taking Aquaculture out of the district plan . How dare you !

You have defiled our democratic process, this is the Dilution of Democracy, whats next, when you decide that you want to fast track forestry, will you pull that also.

You are on a slippery slope !!! where does this stop.

Democracy is a frustrating system, but it's the best system we have got, if a law is unjust as a community we can change it , if there is no law we can create one.

We elect people as councillors to represent us, people who know our history , our culture and environment, if they don't know we can educate them , but we rely on them to manage our Sounds.

This is local government by the people for the people.

This is Democracy, you have no right to interfere in this process, and to call the application by one company a matter of National importance is an insult to everyone's intelligence.

If you must grow this industry that takes fish stocks off poor people to convert into feed to sell to rich people , look for a Truly Sustainable method, I think that storms and raising water temperature will prevent open sea farming . Ideal for mussel farming !!

I think that land based fish farming is the future, where they dig their ponds out of the land, pump in the cool clear waters of Cook Strait, circulate around the ponds, feed the fish on Sea weed which the industry can farm themselves to what in time will all be herbivore fish, control the water temperature and filter the waste out (to be dumped in an environmentally acceptable manner) before being returned to the sea.

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The farm will be near the town like Blenheim, Riverlands, or lake Grassmere where there are huge laggons right along side the road and rail network. close to the coast, easy access for the large quantities of feed and be close to the town for workers access. Yes it would be more expensive and would reduce their profit margins, but the only reason their profits are so good is because they don't pay rates for their sites and they just dump their waste in the sea. Your Ministry of environment should insist on this industry having to dispose of their waste effectively without pollution.

The company will have to pay rates for the land and will have to pay to dispose of their rubbish, like every other industry, As a govt agency MPI need to make this industry clean up their act

Your turning a blind eye to the terrible pollution of our rivers is bad enough, man up and clean up this industry, why should the Sounds environment have to subsidize their waste.

King Salmon say this technology isn't available , Rubbish, they have had them in Canada for years.

The last EPA hearing process cost them between 11 and 15 million dollars , that would of built a magnificent land based closed containment farm that the whole community and country would be proud of.

Remember that King Salmon is just one stake holder, a small player compared to our tourism industry, yet it has the potential to destroy our industry, the Sounds ecology is dying, please don't make it any worse by adding 5 times the nitrogen and remember the precautionary principal.

Every action has a reaction and every creature in the marine ecosystem is symbiotic.

I have limited my submission to only cover Totaranui, That doesn't mean that I am not concerned about Hoiere, but there are residence from there that have a far better knowledge than me of their own rohe, only thing I will say is that the pollution from the high flow sites there will be distributed by the tide right thru the Sound. One good thing is that in time it will probably destroy the mussel industry, which should be moved out into the open sea.

You people shouldn't be looking at high flow sites you need to be looking at ways of getting Salmon farming out of our Sounds altogether. And making the sounds into a marine reserve which long term will be of far greater ecological and economic value to NZ.

Written Comment No: 0394

Subject	Potential relocation of salmon Farms in the Marlborough Sounds.
From	Peter Beech
To	aquaculture.submissions@mpi.govt.nz
Sent	Monday, 27 March 2017 5:06 p.m.

To whom it may concern,

Could you please add this page to the my submission .

We were told that K\Salmon if they relocate their farms will sell the farms to mussel farmers, this is fundamentally wrong.

Before these licences were granted, the water space belonged to the NZ public, yes K/S had to pay for licenses but the space was free.

If vacated it should return to the NZ public, there is a precedence here in so far as when Maori land was confiscated under the military of works act

When it was no longer required it was sold instead of returning to the original owners. Two wrongs don't make a right.

The other issue is that the sea bed under these low flow sites are covered in heavy metals, like copper lead zinc phosphorous etc... these heavy metals never break down.

It is wrong to allow mussel farmers to grow kai on top of these heavy metals.

K/S need to vacuum dredge these sites then the court needs to give the MDC, DOC, Guardians of the Sounds the opportunity to restore these sites by dropping shell, seeding seaweed, kaimoana, placing Reef balls.

Sites like Rua Kaka would be ideal for this.

Finally, if new sites were to be granted, they should be for no longer than 10 yrs like Norway, should only be allowed a small allocation of feed to be increased incrementally based on ecological monitoring.

If sites fail to comply they should be dredged clean by K\ S and restored.

Any land based sites that are polluted with heavy metals have to have all the polluted soils removed and dumped in an environmentally safe manner in council designated sites.

Why should it be any different for aquaculture, if a harbour board want to create a marina or deep water for a port they will soon dredge the mud up.

Noho Ora Mai,

Pete Beech.

Written Comment No: 0538

Subject	My thoughts for the Minister on potential relocation of Salmon Farms
From	Ron Melton
To	aquaculture submissions
Cc	Aaal Ron Ron
Sent	Monday, 27 March 2017 4:12 p.m.
Attachments	<<Submission on salmon relocation. .docx>>

Thank you for receiving my submission on the relocation of Salmon Farms.

Regards

Christine Beech

Potential Relocation of Salmon Farms in the Marlborough Sounds

COMMENTS FORM

Comments closes 5pm, 27 March, 2017

Your details

Christine M Beech

[REDACTED]

Beachlands RD1

AUCKLAND

EMAIL [REDACTED]

Mobile [REDACTED]

YES I would like to speak to my written comments at a public hearing

Comments sent to: aquaculture.submissions@mpi.govt.nz

DATE: 27 March 2017

I OPPOSE the relocation proposal for the following reasons:

Issue	Comment
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Written Comment No: 0538

1. Process	<ul style="list-style-type: none">• The use of Section 360A of the RMA gives the Minister of Aquaculture the power to over-ride the Marlborough Sounds Resource Management Plan.• It takes decision-making and resource management away from the Marlborough District Council and local
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	<p>community.</p> <ul style="list-style-type: none"> • It disregards the 2013 Board of Inquiry [BOI] and 2014 Supreme Court decisions about expansion of salmon farming into prohibited areas of the Marlborough Sounds. • The proposal provides commercial benefit for one company, using public water space for free, above the interests of other users of the Marlborough Sounds, including iwi. • It sets a precedent for the Minister to make similar water-grabs around New Zealand, usurping the power of local authorities and wishes of local communities.
2. Precautionary approach	<ul style="list-style-type: none"> • Policy 3 of the NZ Coastal Policy Statement calls for a precautionary approach. This was reinforced by the BOI decision [par 179]. • The three new high flow sites granted by the BOI are only just coming on stream. It would be precautionary to wait until monitoring shows the company can operate these sites, along with their other high-flow sites, to comply with the Benthic Guidelines at maximum feed levels for at least three years before any more space is considered. [consistent with BOI Condition of Consent 44a] • This especially applies to Tio Point, which would be the fourth salmon farm in close proximity in Tory Channel. • In the meantime reduce the feed and stocking rates at the low flow sites to meet the Benthic Guidelines.
3. Nitrogen pollution	<ul style="list-style-type: none"> • We dispute the accuracy of Minister's statement: "This proposal is about making better use of existing aquaculture space. There is no proposed increase in the total surface structure area used for salmon farming in the Marlborough Sounds," – Nathan Guy, Minister of Aquaculture.

	<ul style="list-style-type: none"> • The proposed relocation sites are not “existing aquaculture space”. They are prohibited to aquaculture. • While farm surface area may remain about the same, there is a proposed five-fold increase in fish feed to 24,600T a year. • With more feed and more fish, the amount of nitrogen pollution discharged into the Sounds through salmon faeces would also increase. The high-flow farms would be discharging the equivalent of the nitrogen in sewage from a city the size of Christchurch, straight into the sea.¹ • Residents must meet strict obligations to keep waste out of the enclosed waters of the Sounds. Yet this proposal would allow the untreated discharge of polluting nutrients from six new salmon farms. • As a land-based comparison of low flow and high flow sites, it is not OK for a dairy farmer who has been pulled up for discharging effluent into a small stream to resolve the issue by increasing his herd and discharging to a faster river.
4. Offshore Alternatives	<ul style="list-style-type: none"> • The NZKS Supreme Court decision ruled there was an obligation to consider alternatives under the NZ Coastal Policy Statement and Section 32 of the RMA. “Particularly where the applicant for a plan change is seeking exclusive use of a public resource for private gain.” [SC 172-173] • Having salmon farms offshore (open ocean aquaculture) rather than in the confines of the Marlborough Sounds would dilute the pollution and remove the conflict with other users. This approach is being used in countries such as Norway. • Offshore alternatives are barely mentioned in this proposal. NZKS claims

¹ BOI [par 379] Nitrogen equivalent calculations

	<p>it would be achievable in 10 years but was too expensive and not yet proven. There is no information about what is happening in other countries and no cost-benefit analysis about off-shore alternatives.</p> <ul style="list-style-type: none"> • Rather than pushing this relocation proposal for areas prohibited to aquaculture, MPI and the industry should invest in research to expedite offshore farming as a future-proofed alternative.
5. King shag	<ul style="list-style-type: none"> • Policy 11 of the NZ Coastal Policy Statement calls for protection of indigenous species in the coastal environment. • The NZ King Shag is classified as nationally endangered and is found only in the Marlborough Sounds. It is a taonga for Ngati Kuia and Ngati Koata. • King Shag are sensitive to disturbance when breeding, roosting and feeding. Duffers Reef to the Waitata Reach, where five new farms are proposed, are key areas for these activities. • The threat to King Shag was a factor in the BOI restricting the number of new farms in the Waitata Reach to two in its 2013 decision [BOI 1252]. Yet this latest proposal is seeking another five farms in the King Shag foraging area.
6. Landscape and Cumulative effects	<ul style="list-style-type: none"> • This proposal will degrade the Outstanding Natural Landscapes and High Natural Character values of the Waitata Reach. ² • The Board of Inquiry decision identified the threshold number of salmon farms for Waitata Reach as TWO – Waitata and Richmond – and turned down three others because of the cumulative effects on Landscape, Natural Character, King shag feeding and Tangata Whenua

² Marlborough Landscape Study August 2015 by Boffa Miskell and Marlborough District Council, page 108; Natural Character of the Marlborough Coast, Defining and Mapping the Marlborough Coastal Environment, June 2014 by MDC, Boffa Miskell, DOC, Landcare Research and Lucas Associates, page 75.

	<p>values. [BOI 1252]</p> <ul style="list-style-type: none">• NZKS and MPI have ignored this ruling, which was arrived at after a long and considered judicial process. Instead they have joined forces and put forward this relocation proposal for FIVE more farms in the Waitata Reach. None of these farms can be justified.
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Further comment:

Minister I find it astounding that you would consider allowing this company to move its disgusting practice to a new area after it has soiled the area granted to it.

If you allow them to relocate to Tory Chanel and other sites your care-taking of these precious area is highly questionable. I believe the Tory Channel area is extremely important in the life cycle of a number of native species.

How about looking to enhance our wonderful native species. An abundance of which will bring true improvement in quality of life and improvement in economic benefit for many New Zealanders and an improvement in the environment rather than this proposed degradation of the environment.

As New Zealanders we prize our pristine environments and environments in recovery. It is an insult to many of us that you allow this 50% foreign owned company (with questionable practices) to pollute our waterways and exact economic benefit by making the environment deal with their waste at no cost to them. It beggars belief that if you would allow them to relocate, they wouldn't clean up their old site and are given a fresh site to foul.

I would ask you not to circumvent the normal process that has been put in place to protect our environment. As Rob Schuckard reports that it will be the equivalent to the uncontrolled release of nitrogen waste of about 266,000 people. This number of Salmon feed lots in the small area of Tory Channel must have a detrimental effect.

There is a good reason that we don't allow floating pig, beef or poultry feed lots with effluent going into to sea. Salmon shit is still shit.

We know people who are involved in monitoring land based salmon farming in Norway. I understand that this can be done at a slightly increase in costs but all the waste and by product can be used with a financial return. I can put you in touch with these people if it is of help to you.

Christine Beech

Mobile. [REDACTED]

In conclusion:

There should be no discussion of more salmon farms in the Marlborough Sounds until NZ King Salmon shows it can operate the ones it has within the agreed benthic guidelines.

Desired outcome: Option C: The Minister does not recommend the proposed regulations.

Potential relocation of salmon farms in the Marlborough Sounds.

Robert Orca Atayde Beer (Bobby)



I have worked at NZKS for over 7 years. I have 4 children, a wife and a mortgage. I need this company to continue to produce high quality and quantity salmon to keep me in a job so I can support my family. I support moving the farms in the sounds to high water flow sites. It will be better for our environment and more sustainable for years to come and create many jobs in the Nelson/Marlborough area.

Signed

Robert Beer

16.2.17

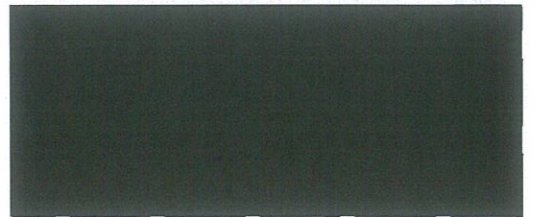
RELOCATION OF SALMON FARM IN
MALBOROUGH SOUNDS

I LOIDA BELESINA ^{HELP} SUPPORT IN MOVING
KING SALMON FARM
NZKS BECAUSE IT GIVE JOB

SECURITY , WAS ABLE TO HELP
MY FAMILY FINANCIALLY AND ALSO
I THINK IT IS ALSO GOOD FOR THE
ENVIRONMENT. IT WILL ALSO HELP
A LOT OF PEOPLE TO HAVE A JOB.

Thank You,

Loida
LOIDA BELESINA



Subject	Potential relocation of salmon farms in the Marlborough Sounds
From	[REDACTED]
To	aquaculture submissions
Cc	[REDACTED]
Sent	Wednesday, 15 February 2017 11:52 a.m.

Salmon Farm Relocation
Ministry for Primary Industries
Private Bag 14
Port Nelson 7042
New Zealand.

Submission

Umukuri Bay Limited supports the removal of the Salmon Farm in Otanerau Bay, Queen Charlotte Sound and its relocation to Tory Channel.

When we first moved to Umukuri Bay over 10 years ago there were plenty of green shell mussels growing and self-seeding on the rocks around our Bay. Today there are none. We put this down to the increase in nutrients in the water derived from the salmon farm. Moving the salmon farm to Tory Channel where there is a much greater flow of water compared to the low water exchange in East Bay will significantly improve water quality in East Bay while having a much lower influence in Tory Channel. This is supported by NIWA 2013, see below.

NIWA 2013. Review of historical water-quality data from Pelorus Sound and Queen Charlotte Sound: long-term NIWA

time-series and Marlborough District Council time-series, Prepared for New Zealand King Salmon, July 2013.

<http://www.marlborough.govt.nz/Environment/Coastal/~media/Files/MDC/Home/Environment/Coastal/NIWAReviewHistoricalWQDataInPS2013.pdf>

“The most notable feature in MDC’s Queen Charlotte data is that water-quality at the (sole) Tory Channel station is consistently different from that of the four stations in the main Queen Charlotte Channel. The Tory Channel station shows little/no evidence of vertical stratification whereas the other stations are stratified during spring, summer and autumn. Perhaps as a consequence, concentrations of chlorophyll and particulate organic matter are usually lower in Tory Channel than elsewhere. As in NIWA’s Pelorus Sound data, DRP nitrate and DRSi tend to be most abundant in the winter months. Chlorophyll cycles less regularly than the nutrients (particularly in the inner Queen Charlotte Sound) and there is some evidence that the annual maximum reliably occurs in spring/summer at the seaward stations, but is less predictable at the inner/central stations.”

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

Dr Brian Bell
Director
Umukuri Bay Limited

[REDACTED] Plimmerton, 5026

Written Comment No: 0011

Email: [REDACTED]

Ph Mobile: [REDACTED]



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Subject	Salmon Farm Relocation
From	[REDACTED]
To	aquaculture submissions
Sent	Tuesday, 14 March 2017 11:37 a.m.

Dear Advisory Panel,

My name is Katrina Beneke and I have worked at NZ King Salmon for 1 & 1/2 years now. I support the potential salmon farm relocation process being proposed by MPI because I believe the salmon farm relocation will provide for better environmental, social and economic outcomes.

My husband and I moved to Nelson from Auckland 2 years ago for a few reasons, the biggest reason being that despite our high joint income, we couldn't afford a house. Moving to a region was extremely appealing, it meant getting away from the traffic, the pressures of big city living and starting a home. My husband was lucky enough to secure a great job with Port Nelson and we figured I'd be able to find something in the Sales and Marketing space that I'd always worked in. That wasn't as easy as I thought it would be and after 6 months of trying I finally took a job as a part-time PA at NZ King Salmon just to get out of the house. I quickly realised what a brilliant move that was as I'd found a company that was visionary, exciting, welcoming, supportive and fun. 8 months later I was moved in to a Brand Manager role with the newly created division, Omega Innovations where our entire goal is to utilise all of the Remaining Raw Materials, further promoting NZKS as a company with true focus on sustainability. If it wasn't for NZ King Salmon, I would have moved us back to Auckland and joined the other 30-somethings that are struggling to get ahead. Now we have a house and a great life in a great part of the country.

By allowing the relocation to go ahead, NZ King Salmon can afford to grow as a company and therefore hire a large number of additional people from both Nelson and Marlborough. These are people that if they can't find a job in this area then will be forced to move to a major city to find work, putting further pressure on housing and increasing traffic issues. The Government is constantly looking at ways to combat the housing shortage in Auckland, Wellington and Christchurch so it makes absolute sense to me to support any company in the regions that wants to grow, especially when that growth has a better environmental impact.

I urge you to truly consider this relocation proposal as for me, the benefits are so clear.

I'm also more than happy to be heard by the hearings panel.

Thank you for taking the time to read my submission.

Kind Regards,

Katrina Beneke

Katrina Beneke

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED], Tahunanui, [REDACTED]



New Zealand King Salmon



OMEGA PLUS

Internet e-Mail Disclaimer:

Written Comments No: 0202

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Subject	Re: FW: template for feedback on NZKS proposal
From	Evangeline Benger
To	aquaculture submissions
Sent	Monday, 27 March 2017 7:45 a.m.
Attachments	<<3. MEC salmon farm relocation proposal. main points for circulation. mar 23 (Evangeline Benger).docx>> <<3. MEC salmon farm relocation proposal. main points for circulation. mar 23.docx>>

From: Parks Barroso [REDACTED]
Sent: Sunday, 26 March 2017 10:31 p.m.
To: Evangeline Benger
Subject: Fwd: FW: template for feedback on NZKS proposal

----- Forwarded message -----

From: Penny Wardle [REDACTED]
Date: Sat, Mar 25, 2017 at 12:05 PM
Subject: FW: template for feedback on NZKS proposal
To: Parks Barroso [REDACTED]

This is for Evie - must be in this coming Monday, March 27.

Hello friends

Here is a template for "comments" to MPI about the NZ King Salmon new farms proposal. It's been prepared by the busy elves at the Marlborough Environment Centre. Feel free to use whatever bits of it you like. Please add a comment of your own in the space at the end, that way they have to count each one as a unique submission. Deadline is 5pm on Monday March 27. And you're welcome to circulate to friends, Facebook etc.

More info: <https://www.mpi.govt.nz/news-and-resources/consultations/marlborough-salmon-relocation/>

--

Parks Barroso
College of Charleston Honors College '16
[REDACTED]

Potential Relocation of Salmon Farms in the Marlborough Sounds

COMMENTS FORM

Comments closes 5pm, 27 March, 2017

Your details

NAME: Evangeline Bengier

ORGANISATION (if applicable):

CONTACT PERSON:

POSTAL ADDRESS: [REDACTED] Witherlea, Blenheim

EMAIL: [REDACTED]

DAYTIME PHONE: [REDACTED]

MOBILE: [REDACTED]

YES I would like to speak to my written comments at a public hearing

NO I do not want to speak to my comments at a public hearing

Comments sent to: aquaculture.submissions@mpi.govt.nz

DATE: 27/03/2017

Written Comment No:0486

I OPPOSE the relocation proposal for the following reasons:

Issue	Comment
1. Process	<ul style="list-style-type: none">• The use of Section 360A of the RMA gives the Minister of Aquaculture the power to over-ride the Marlborough Sounds Resource Management Plan.• It takes decision-making and resource management away from the Marlborough District Council and local community.• It disregards the 2013 Board of Inquiry [BOI] and 2014 Supreme Court decisions about expansion of salmon farming into prohibited areas of the Marlborough Sounds.• The proposal provides commercial benefit for one company, using public water space for free, above the interests of other users of the Marlborough Sounds, including iwi.• It sets a precedent for the Minister to make similar water-grabs around New Zealand, usurping the power of local authorities and wishes of local communities.
2. Precautionary approach	<ul style="list-style-type: none">• Policy 3 of the NZ Coastal Policy Statement calls for a precautionary approach. This was reinforced by the BOI decision [par 179].• The three new high flow sites granted by the BOI are only just coming on stream. It would be precautionary to wait until monitoring shows the company can operate these sites, along with their other high-flow sites, to comply with the Benthic Guidelines at maximum feed levels for at least three years before any more space is considered. [consistent with BOI Condition of Consent 44a]• This especially applies to Tio Point, which would be the fourth salmon farm in close proximity in Tory Channel.• In the meantime reduce the feed and stocking rates at the low flow sites to meet the Benthic Guidelines.

<p>3. Nitrogen pollution</p>	<ul style="list-style-type: none"> • We dispute the accuracy of Minister's statement: "This proposal is about making better use of existing aquaculture space. There is no proposed increase in the total surface structure area used for salmon farming in the Marlborough Sounds," – Nathan Guy, Minister of Aquaculture. • The proposed relocation sites are not "existing aquaculture space". They are prohibited to aquaculture. • While farm surface area may remain about the same, there is a proposed five-fold increase in fish feed to 24,600T a year. • With more feed and more fish, the amount of nitrogen pollution discharged into the Sounds through salmon faeces would also increase. The high-flow farms would be discharging the equivalent of the nitrogen in sewage from a city the size of Christchurch, straight into the sea.¹ • Residents must meet strict obligations to keep waste out of the enclosed waters of the Sounds. Yet this proposal would allow the untreated discharge of polluting nutrients from six new salmon farms. • As a land-based comparison of low flow and high flow sites, it is not OK for a dairy farmer who has been pulled up for discharging effluent into a small stream to resolve the issue by increasing his herd and discharging to a faster river.
<p>4. Offshore Alternatives</p>	<ul style="list-style-type: none"> • The NZKS Supreme Court decision ruled there was an obligation to consider alternatives under the NZ Coastal Policy Statement and Section 32 of the RMA. "Particularly where the applicant for a plan change is seeking exclusive use of a public resource for private gain." [SC 172-173] • Having salmon farms offshore (open ocean aquaculture) rather than in the confines of the Marlborough Sounds would dilute the pollution and remove the conflict with other users. This approach is being used in countries such as

¹ BOI [par 379] Nitrogen equivalent calculations

Written Comment No:0486

	<p>Norway.</p> <ul style="list-style-type: none"> • Offshore alternatives are barely mentioned in this proposal. NZKS claims it would be achievable in 10 years but was too expensive and not yet proven. There is no information about what is happening in other countries and no cost-benefit analysis about off-shore alternatives. • Rather than pushing this relocation proposal for areas prohibited to aquaculture, MPI and the industry should invest in research to expedite offshore farming as a future-proofed alternative.
5. King shag	<ul style="list-style-type: none"> • Policy 11 of the NZ Coastal Policy Statement calls for protection of indigenous species in the coastal environment. • The NZ King Shag is classified as nationally endangered and is found only in the Marlborough Sounds. It is a taonga for Ngati Kuia and Ngati Koata. • King Shag are sensitive to disturbance when breeding, roosting and feeding. Duffers Reef to the Waitata Reach, where five new farms are proposed, are key areas for these activities. • The threat to King Shag was a factor in the BOI restricting the number of new farms in the Waitata Reach to two in its 2013 decision [BOI 1252]. Yet this latest proposal is seeking another five farms in the King Shag foraging area.
6. Landscape and Cumulative effects	<ul style="list-style-type: none"> • This proposal will degrade the Outstanding Natural Landscapes and High Natural Character values of the Waitata Reach. ² • The Board of Inquiry decision identified the threshold number of salmon farms for Waitata Reach as TWO – Waitata and Richmond – and turned down three others because of the cumulative effects on Landscape, Natural Character, King shag feeding and Tangata Whenua values. [BOI 1252] • NZKS and MPI have ignored this ruling, which was arrived at after a long and considered judicial

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Written Comment No:0486

	process. Instead they have joined forces and put forward this relocation proposal for FIVE more farms in the Waitata Reach. None of these farms can be justified.
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Further comment: the fact that they are suggesting that these farms offer public interest and a tourist attraction shows just how much they are out of touch with the community that this impacts upon the most. The Marlborough Sounds are unparalleled in their beauty and these farms will continue to pollute their beauty and do irreparable damage to the ecosystem.

In conclusion:

There should be no discussion of more salmon farms in the Marlborough Sounds until NZ King Salmon shows it can operate the ones it has within the agreed benthic guidelines.

Desired outcome: Option C: The Minister does not recommend the proposed regulations.

Subject	NZKS Salmon Farm Relocation
From	Sam Best
To	aquaculture submissions
Sent	Thursday, 23 March 2017 10:24 AM

Written Comments No: 0303

My name is Sam Best, and I am writing in support of the proposed salmon farm relocation.

Not only do I believe that the Salmon farm relocation process is in the best interests of the Nelson / Marlborough region economically but also environmentally.

With global wild catch fish populations dwindling and in many instances collapsing I believe that there is little option but to move to more sustainable methods of providing protein to what is a growing population.

However Salmon farming needs to be conducted in line with best management practices (BMP) which will prove had for NZKS to implement at the Crail Bay, Waihinau, Ruakaka and Otanerau sites. It is in New Zealand's best interest to allow NZKS to switch these sites for more suitable sites that allow compliance with BMP and a more positive economic and environmental outcome.

I also believe that the impact of salmon farming is far less detrimental to the environment and has a smaller visual impact than that of intensive dairying or forestry, yet the consenting process for salmon farming is far more rigorous. As a country we need to ensure that we get the balance right between the what's best for the country, the environment and the economy and do not allow processes such as this to be diverted by a small vocal minority.

Regards

Sam Best

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

--

Sam Best, *Performance and Planning Manager*



New Zealand King Salmon



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



ŌRA KING™

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