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

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## Written Comments No: 0447

Subject	<b>TO: Salmon Relocation Advisory Panel</b>
From	<a href="#">Ore Dagan</a>
To	aquaculture submissions
Sent	Sunday, 26 March 2017 10:59 a.m.

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.

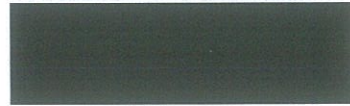
Lastly, I think it is critical that NZ continue to export the best King salmon in the entire world.

Ore Dagan

## Written Comments No: 0260

Subject	<b>Salmon Farm Relocation</b>
From	[REDACTED]
To	aquaculture submissions
Sent	Sunday, 19 March 2017 3:07 p.m.
Attachments	<<Salmon Farms.odt>>

## Written Comments No: 0260



The Marlborough Salmon Farm Relocation Advisory Panel

re; Salmon Farm Relocation.

Dear Sirs,

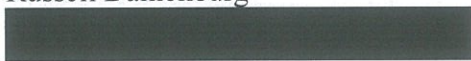
As a recreational user of the Marlborough Sounds for more than twenty years I would like to make a submission on the proposed changes to Farm location.

On studying the new locations, the benefits to both fish health and the environment are obvious and do not require further comment, other than to say that they are a practical solution to the use of the area for aquaculture and recreation. I believe this proposal is a major improvement in the future shared usage of the Sounds area as the new locations do not impede unduly the passage of recreational boating for fishing or to access the bays for overnight anchoring.

The proposals indicate that the farms will have suitable lighting for navigation after dark, but in my experience travel at night by small power boats is very rare, and generally only used by the more experienced.

I cannot see any adverse affects to either the environment or to other users of the Sounds in these changes, and I would urge the Panel to give the Proposals their most favourable consideration.

Russell Dahlenburg





## Written Comment No: 0084

Potential relocation of salmon farms in the Marlborough Sounds.

Hana Danielsen

I work at NZKS and I support the relocation of our 6 farms in the sounds. Better quality and more production will result in more jobs for the top of the south. Higher production will mean more money for the workers and for the Nelson, Marlborough area. Better for the environment, reducing the effects of the water quality and the seabed is always a plus.

Signed Hana Danielsen  
Hana Danielsen 16-2-2017.

## Written Comment No: 0229

Subject	<b>King Salmon Relocations</b>
From	[REDACTED]
To	aquaculture submissions
Sent	Thursday, 16 March 2017 9:44 a.m.

I am a strong believer that proposals to relocate the Aquaculture farms operated by this company into faster moving waters as there are benefits to the environment as well as to the produce from the farms . I believe the proposals from King Salmon should be allowed to proceed on the basis of their applications.

Gary Davis

Nelson

## Written Comment No: 0229

Subject	Re: Automatic reply: King Salmon Relocations
From	[REDACTED]
To	aquaculture submissions
Sent	Thursday, 16 March 2017 9:45 a.m.

Speaking rights not required thank you  
Gary Davis

On Thu, Mar 16, 2017 at 9:44 AM, aquaculture submissions  
<aquaculture.submissions@mpi.govt.nz> wrote:

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

>

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

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

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## Written Comments No: 0418

Subject	MPI Salmon Farm Relocation Proposal
From	<a href="#">Bev Davis</a>
To	aquaculture submissions
Sent	Monday, 27 March 2017 11:33 AM

[REDACTED]  
Marlborough  
Buckinghamshire  
[REDACTED]  
ENGLAND  
[REDACTED]

To: The Salmon Relocation Advisory Panel,

I would like to express my **support** from the UK for the potential Salmon Farm Relocation in the Marlborough Sounds, New Zealand.

I have looked at depth at the information provided and can only see that the relocation would provide better environmental, social and economic outcomes.

Relocating the farms from low flow sites to higher flow sites can only have a positive outcome particularly for the environment and the fish welfare. Moving the sites away from holiday beaches would also improve the reputation of the area for tourists. It would be fantastic for Marlborough to not only be known for wine making but to be also known for its outstanding Salmon production.

I look forward to being in New Zealand and hopefully seeing the growth that New Zealand King Salmon is able to achieve not only for themselves but also for Marlborough and the whole of New Zealand.

Many thanks

Bev Davis

## Written Comment No: 0541

Subject	<b>Support for the Salmon Relocation Advisory Panel</b>
From	<a href="#">Joanna Davis</a>
To	aquaculture submissions
Sent	Monday, 27 March 2017 3:58 p.m.
Attachments	<<MPISubmissionJoannaDavis.pdf>>

To Whom it May Concern,

Please find attached document in support of the proposed Salmon Farm relocation.

Many thanks

Joanna Davis



Picton 7220

Salmon Farm Relocation  
Ministry for Primary Industries  
Private Bag 14  
Port Nelson

27th March 2017

To: The Salmon Relocation Advisory Panel,

I have been working at New Zealand King Salmon for approximately a year as the Personal Assistant to the COO. I would like to express my **overwhelming support** for the potential salmon farm relocation process that is being proposed by MPI.

I moved to New Zealand from London to follow my partner who lives and works in Picton as a commercial diver. When I originally moved to New Zealand I was particularly daunted at the prospect of losing my career and lifestyle in London. In comparison to London there were very few opportunities for me in Marlborough which was of great concern when I moved for love. Being offered the job at New Zealand King Salmon has genuinely changed my life for the better. Personally, this job has meant that I can finally live with my partner after many difficult years apart and has kept me busy and fully engaged throughout a difficult move.

Over time working at New Zealand King Salmon I have been exposed to a vast amount of information which has given me a true insight into the Aquaculture world. I have become more aware of the realities of fishing and population growth and the need to provide protein for an ever growing population. I can see that New Zealand King Salmon takes real pride in its surroundings and supports its employees to an incredibly high standard.

The economic and population benefits to Marlborough alone are what keeps people in Marlborough. To list the many people that benefit from New Zealand King Salmon being in Marlborough would be a very long list but some of the companies I shall name: Picton Water Taxis take our workers to and from each of the farms every single day of the year, Gregory Engineering, Signs Now, Picton Village Bakerij, Fresh Choice, Take Note. The restaurants that we use for meetings- Gusto, Cortados, Seabreeze, Escape to Picton. All of these restaurants are proud to sell our fish and state that it is locally grown. Landlords that our employees rent from and the real estate agents - Summit, Harcourts, Bayleys. All of



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these companies and so many more indirectly benefit from New Zealand King Salmon. If we increase, so do they!

The opposition to New Zealand King Salmon seems to often come from people that don't even live in the sounds. Throughout the town of Picton, I have not witnessed a single person that has been against the Salmon Farm Relocation.

Let's allow New Zealand to become well known for Salmon not only wine.. For New Zealand to be a country that supports its companies and allows them to flourish. I cannot see a single disadvantage to the Salmon Farm relocation proposal in all areas- environmental, social and economic.

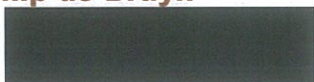
Yours faithfully

Joanna

## Written Comment No: 0373

Subject	Salmon farms in Marlborough
From	<a href="#">Phillip deB</a>
To	aquaculture.submissions@mpi.govt.nz
Sent	Monday, 27 March 2017 7:09 PM
Attachments	<<Potential_Relocation_of_Salmon_Farms_in_the_Marlborough_Sounds (1).docx>>

**Phillip de Bruyn**



## Potential Relocation of Salmon Farms in the Marlborough Sounds

### COMMENTS FORM

Comments closes 5pm, 27 March, 2017

#### Your details

NAME: Phillip de Bruyn

ORGANISATION (if applicable):

CONTACT PERSON:

POSTAL ADDRESS: [REDACTED] Renwick 7204

EMAIL: [REDACTED]

DAYTIME PHONE:

MOBILE: [REDACTED]

**YNO** I do not want to speak to my comments at a public hearing

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

DATE: 27 March 2017

**I OPPOSE the relocation proposal for the following reasons:**

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Issue	Comment
1. Process	<ul style="list-style-type: none"> <li>• The use of Section 360A of the RMA gives the Minister of Aquaculture the power to over-ride the Marlborough Sounds Resource Management Plan.</li> <li>• It takes decision-making and resource management away from the Marlborough District Council and local community.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> </ul>
2. Precautionary approach	<ul style="list-style-type: none"> <li>• Policy 3 of the NZ Coastal Policy Statement calls for a precautionary approach. This was reinforced by the BOI decision [par 179].</li> <li>• 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]</li> <li>• This especially applies to Tio Point, which would be the fourth salmon farm in close proximity in Tory Channel.</li> <li>• In the meantime reduce the feed and stocking rates at the low flow sites to meet the Benthic Guidelines.</li> </ul>
3. Nitrogen pollution	<ul style="list-style-type: none"> <li>• We dispute the accuracy of Minister's statement: "This proposal is about making better use of</li> </ul>

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	<p>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.</p> <ul style="list-style-type: none"> <li>• The proposed relocation sites are not “existing aquaculture space”. They are <b>prohibited</b> to aquaculture.</li> <li>• While farm surface area may remain about the same, there is a proposed five-fold increase in fish feed to 24,600T a year.</li> <li>• 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.<sup>1</sup></li> <li>• 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.</li> <li>• 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.</li> </ul>
4. Offshore Alternatives	<ul style="list-style-type: none"> <li>• 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. <b>“Particularly where the applicant for a plan change is seeking exclusive use of a public resource for private gain.”</b> [SC 172-173]</li> <li>• 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.</li> <li>• 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.</li> </ul>

<sup>1</sup> BOI [par 379] Nitrogen equivalent calculations



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	<p>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"> <li>• 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.</li> </ul>
5. King shag	<ul style="list-style-type: none"> <li>• Policy 11 of the NZ Coastal Policy Statement calls for protection of indigenous species in the coastal environment.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> </ul>
6. Landscape and Cumulative effects	<ul style="list-style-type: none"> <li>• This proposal will degrade the Outstanding Natural Landscapes and High Natural Character values of the Waitata Reach. <sup>2</sup></li> <li>• 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]</li> <li>• 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.</li> </ul>

<sup>2</sup> 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.



**Further comment:**

**In conclusion:**

There should be no 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.

## Written Comments No: 0323

Subject	<b>Submission form</b>
From	<a href="#">Fabienne de Gomrée</a>
To	aquaculture submissions
Sent	Monday, 27 March 2017 2:26 PM
Attachments	<<170306-SubmissionForm.pdf>>

Please find here my submission form;

Thanks;

Fabienne de Gomree

## Written Comments No: 0323

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)

# Written Comments No: 0323

## 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	Fabienne de Gomree		
Address	<div></div> 7220 Picton		
Email	<div></div>		
Telephone (day)	<div></div>	Mobile	<div></div>

<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 <div></div>
<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).

### *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.

## Written Comments No: 0323

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:

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



## Written Comment No: 0125

Subject	<b>Relocation of NZKS farms to higher flow</b>
From	Michael Delaney
To	aquaculture submissions
Sent	Monday, 27 February 2017 2:56 p.m.

To whom it may concern,

I proudly support the relocation of NZKS farms to higher flow as it would benefit the company by producing good quality and a healthy salmon for the customers and at the same time good for the environment too. As we all know that salmon gives as a natural omega 3 which is needed by each and everyone of us.



## Written Comments No: 0531

Subject	<b>Fwd: Emailing: Potential-Relocation-of-Salmon-Farms-Dave1</b>
From	<a href="#">Dave Delaney</a>
To	aquaculture submissions
Sent	Monday, 27 March 2017 4:23 p.m.
Attachments	<<Potential-Relocation-of-Salmon-Farms-Dave1.pdf>> <<ATT00001.htm>>

David Delaney



Nelson

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Potential-Relocation-of-Salmon-Farms-Dave1

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# Written Comments No: 0531

## 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**

### Consultation questions

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

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

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

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

### Written comments are official information

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

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

# Written Comments No: 0531

## Public hearings

A Marlborough Salmon Farm Relocation Advisory Panel will hold hearings in April. These hearings will allow people to speak to their written comments.

If you would like to attend a hearing and meet with the panel, please let us know as part of your written comments, including which location you would prefer.

Once we receive your written comments and your request to meet with the panel, we will notify you of the date, time and location.

<input type="checkbox"/>	I would like to speak to my written comments at a public hearing
<input type="checkbox"/>	I do not want to speak to my written comments at a public hearing



## Questions

### Question 1:

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

No I do not think they should be relocated.

### Question 2:

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

My observations are that none of the sites are suitable for salmon farming . It seems you are proposing to move one problem from a lower flow area to a higher flow area – in essence moving the **issue** (you still have the same issue you are just spreading it over a larger area ) from one spot to another, wouldn't you agree? .

### Question 3:

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

None.

These existing farms in the Marlborough Sounds cause pollution, this is a fact.

Is it not true the pollution these farms make would be better confined to a smaller area rather than spreading the pollution around with higher flowing tides?

This brings me to my next point – It seems by your own admission these farms cannot meet a standard now in this low flow area because of the pollution that is produced surely this is an example of an unethical fishing resource ?

### Question 4:

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

The reality is my concerns lay with all of the sites; existing and proposed.

Serious concerns with the Mid Channel Waitata it will cause problems with navigation, tidal flow and swell height.

To resolve these concerns its simple, please do not relocate there.



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**Question 5:**

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

No. [Read this q again](#)

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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?

Yes, there should be strict water testing and sea bed observation. There should be exacting assessments of the eco system in the Marlborough Sounds before during and after any relocation, the conditions of healthy maintenance should be pressed on this private company.

It seems that the solution of pollutions is not the obvious here: PREVENTION it is simply DILUTION and in a fruitful country that actively support sustainability this is nothing short of disappointing.

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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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If they go ahead yes .

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**Question 8:**

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

It is clear we have issues presently.

The existing farms have an detrimental impact on the sea bed and eco system.

The cause visual pollution.

Additional sites and relocation will only add to the and some of the site have the potential to cause shipping hazards, therefore I would agree that the overall surface structure should not be increased nor should relocation happen. If it is your proposal to maintain the same surface structure collectively and spread the farms I do not condone this either.

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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?

If these sites were vacated, I do not believe that they should remain open to other type of aquaculture settlements.

These sites are largely damaged and polluted already; there is video footage to prove this. The images from beneath these sites highlight an alarming state of poison and poor oxygen levels. I am no marine biologist but surely these sites need time to recover? That is of course if recovery is actually possible.

**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?

Aquaculture should be fully prohibited to let the area recover .

**Question 11:**

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

Only if they can produce evidence that the farms are not effecting the water quality of the Marlborough Sounds , which I think is obvious – you cannot produce such evidence. Therefor I do not agree with any development of this nature: whether you do it stage by stage all you are doing is prolonging the inevitable destruction and pollution of the marine life and eco system in general.

**Question 12:**

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

Yes: the predicted feed level quantity.  
This wording is hugely ambiguous.



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**Question 13:**

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

Yes.

They have polluted the areas beneath the farms and I believe this pollution has caused unique permanent damage. Images from these show a dead sea bed: nothing can grow in the mud the the exception of some forms of tube worms.

The oxygen level is also an issue.

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**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?

I would say that the reason for moving the farms is purely down to the salmon growth rates.

The rate is low because the water quality underneath and around these farms is so bad that it effecting the growth in the salmon which is effecting the business which in turn is limiting profits.

I believe leaving the farms in a low flow area is better for the entire eco system in the Marlborough Sounds. It seems this is the best option out of a very bad bunch of options.

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**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?

Get the good man to have a look at this link .

Most of the time the human mind reacts to visual information rather than written theory.

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<https://www.youtube.com/watch?v=Ds7TPeWGVA4>

Alternatively why not view the information available to everyone on "You tube" titled "King salmon suffocating the sounds"

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**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?

The visual pollution does not concern me you could have a dump truck parked out there as long as it wasn't making a negative impact on the eco system, that is what is important here.

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**Question 17:**

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

No

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**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?

Yes, do not relocate.

This question asks how to minimise effects on landscape and natural character – these farms are not natural. Increasing the farms can only have a negative impact on a already declining eco system.

Why discuss methods to reduce the inevitable negative effect they will have on the landscape and natural character? There is a simpler measure – do not have them at all.

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**Question 19:**

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

You have had experts go over this with their diagrams and there dilution facts obviously using the good old quote “the best solution for pollution is dilution”.

Allow me to offer a simple example:

If the Fukushima melt down is leaking into the ocean ,why not just lift it up and put it in Antarctica where the oceans tidal current will disperse it at a greater rate?...

Preposterous idea wouldn't you say?

So why would you do it with a salmon farm?

So to sum it up this proposal condones the theory that it is acceptable to spread a toxic substance into an eco system that is already struggling .

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**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?

No.

I do not believe it is possible to have a mass fish feeding industry present, feeding a large amount of fish, for maximum growth in a short time frame and not have a negative effect on water quality.

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**Question 21:**

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

You are the experts. I am sure you are perfectly aware of all the effects on water quality. I is my observation that you are choosing not to accept the severity of the pollution and he fragility of our eco system.

**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?

Tio point site seems to be a issue so on a incoming tide all the polluted water from a feed and excrement from the fish go into oyster bay and settle on the ocean floor?  
Is it not your intention to relocate to higher tidal areas and “dilute and disperse the pollution? your  
Yet you propose to relocate a farm at the mouth of a dead end street ?

**Question 23:**

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

Quite simple: there will be a hugely negative impact on the sea bed.

Reefs has already been destroyed as a by product of these farms.

If reef is destroyed or even muddy sea bed areas are this corrupts the potential for scallops to grow or gurnard live and graze on food, these are just a couple of examples that the impact is going to be negative.

Again you are the experts and are aware of this so why add more pollutants to an already declining eco system?

**Question 24:**

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

Yes don't have the FARMS there .



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**Question 25:**

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

I am no expert but isn't it obvious a large commercial amount of fish feed and excrement is not good for the seabed.

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**Question 26:**

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

I have seen with my own eyes the sharks that are enticed in and around these fish farms . One of my favourite hobbies is scuba diving a tradition my father and his father enjoyed. It would be hugely disappointing that this tradition end as a result of a company who wish to capitalise on the natural environment.

I would like to avoid a traffic jam with a large shark on the way to check out a supermarket of fish that you have just plonked in the middle of a main highway of our sounds .

So is another example of a very negative effect from my point of view of pelagic fish in the sounds

History talks of the great white sharks coming into feed on the whales at the whaling station in Tory channel.

The fact is pelagic fish will come where the food is .

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**Question 27:**

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

There is of course potential for these seabirds to get caught in the nets while trying to get a free feed, however as I have said I am not an expert I am sure DOC can provide a list of reasons for this not to go ahead.

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**Question 28:**

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

No, the sea birds will go where the food is .Lucky they have wings with great eyesight .

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**Question 29:**

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

Yes, surely there will be a negative impact on dolphins swimming around nets with fish in it, however the orca may feed on the pelagic fish that are around the nets.

**Question 30:**

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

I have seen dolphins in every part of the sounds and have seen the orcas also in most of the areas so perhaps not .

**Question 31:**

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

Yes.

There is a problem with this suggestion.

The people who do the independent bio security plans have a real potential to be biased

Is it not the case they have a secondary money input into the farms? Unless you can source an independent auditor outside of New Zealand surely within the country there are only a selected amount of companies that could do this who may already be working with king salmon in other aspects of their sites .

**Question 32:**

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

Going back to an earlier observation – these sites are being relocated to produce more, therefore the salmon health will likely remain the same. I would like to say that my real concerns lay in the eco system.

If the salmon were taken from the wild I would perhaps have more of an opinion here but they are massed produced for human consumption, for profit and largely to be exported from New Zealand.



**Question 33:**

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

Yes !

I would ask if the experts have been on the water of the proposed relocation sites on a busy weekend and observed the traffic coming out from Havelock and rest of the sounds to the fishing sites which are now out the front of sounds – another by product of the declining eco system within the sounds, everyone has to travel further.

High tidal flow normally is a by-product of being stuck in the middle of a water way . example( A ) Mid Channel Waitata

**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?

It is quite simply a hazard. There is no other way to describe it, but I will attempt to with the example below.

It would be like putting a blow up pool in the middle of a main highway in Auckland everyone would see it everyone should know it is there but at some point someone is going to hit it .

Another analogy would be : DONT leave hazards in a main walkway

**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?

The old ww2 gun torrents  
Post office point  
Maud island  
Queen charlotte sound

All appealing parts of our history that have potential to attract tourists far more appealing than a great eye sore salmon farm.

**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?

This is a catch 22.

Maybe get some blue camouflage tarpaulins to cover the sites with so they become invisible. But then it defiantly would become a work hazard issue.



**Question 37:**

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

Just the fact that the sounds heritage wasn't growing salmon.

**Question 38:**

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

Are you talking about the guys drinking habits on the live aboard sites? I have known a few that have worked on the sites and some of them can get loud. Otherwise i don't think there feeders are loud or them scaring off the seals or screaming at the sharks should be a issue.

**Question 39:**

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

I believe you are perfectly aware that these lights are designed to trick the fish into growing faster and larger therefore requiring more food resulting in more excrement more pollution. Dare I say it – MONEY TALKS ECO SYSTEM WALKS!

**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?

Aside from an extremely detrimental effect on the health of our Eco System.  
Of course we will have noise and light pollution from the staff housing the farms.

I am also concerned for the roads and general tranquillity at the sounds.

These little bays that the sounds are known for and loved for are going to be a highway for salmon trucks and servicing the live aboard sites.

In essence the beauty in local peaceful and quite places will become a moving highway for a fish that doesn't know darkness.



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

I would like to offer you a little history of my experience at the Marlborough Sounds.

My family have had the privilege to own a Bach in Tennyson inlet for the last 45 years, this makes me and my two sisters the third generation to spend good quality family time in the region.

In my 37 years naturally I have witnessed a lot of changes. Of course the population has increased and the landscape has changed but the most notable change sadly is the decline in sea life.

25 years ago the coast was riddled with large amounts of weed that went from the low tide mark to the 15 to 17 meter mark all the way up into the inner sounds. This is no longer the case, it is more likely you will wound yourself with ROCK OYSTERS. There is small amounts of weed splattered along the coast line where once there were large amounts .

I remember as a kid being blown away by the large amounts of bull kelp out in the outer sounds floating on the surface, this is something as an adult I have not seen in years.

We know the area has dramatically changed in the past 50 years and its inhabitants that have created that change. I am completely against actively and knowingly introducing any more negative environmental factors.

I would love nothing more that to offer my children the same experiences I had; to grow up being able to snorkel around weed lines at low tide and getting freaked out just as I did at looking in weed and seeing fish and other crustations on the sea floor.

I know you have a tough job in working with business in making jobs for people and helping the economy and I don't envy your position, however something must be done introducing more farms into a declining eco system is unacceptable .

The information you have provided is plentiful, however the message and science behind that message is weak that the best solution for pollution is dilution .

Let us be honest and perhaps simple. The best SOLUTION TO POLUTION IS PREVENTION!! NOT MAKING IT IN THE FIRST PLACE .

I believe that moving the salmon farms into a high flow areas is wrong and negative for the Marlborough Sounds.

## Written Comments No: 0259

Subject	Marlborough salmon relocation submission
From	[REDACTED]
To	aquaculture submissions
Sent	Saturday, 18 March 2017 7:21 p.m.
Attachments	<<Submission Letter SDOL.pdf>>

Hello,

Please consider my submission letter for the Marlborough salmon relocation here attach.

Thank you,

Nāku noa, nā

**Salvador Delgado Oro Laprida**, *Queen Charlotte Sound Regional Manager*



[REDACTED] | W: [www.kingsalmon.co.nz](http://www.kingsalmon.co.nz) | A: Picton Aquaculture Office, 43  
Dublin Street, P.O. Box 3, Picton 7220, New Zealand

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To whom it may concern

I support the salmon farm relocation process because, in an effort to move towards a sustainable future, it will take not only innovative thinking but also global knowledge to make effective decisions. Salmon aquaculture is a growing, and highly demanded industry. As the demand continues to grow, sustainability must remain a top priority and important aspect of future production. While improved technology is a big step in the right direction, it also requires the demand of the consumer. We are a part of the solution, and we can demand for a sustainable future attending the relocation request.

Declining fish stocks and a growing world population are not a good combination, which is why sustainable aquaculture has such a promising future.

It is now the case that farmed salmon finds its way onto a growing number of dinner plates every day and this is just one example of how sustainable fish farming is fulfilling several requirements, providing a valuable and sustainable resource and also helping to protect fish stocks in general.

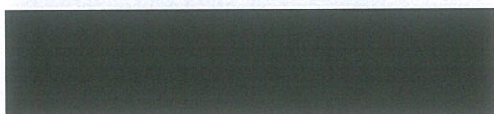
Agriculture isn't natural. Anywhere agriculture is practiced, natural systems are altered and replaced by something new that differs, quantitatively or qualitatively, from earlier wildness. Because all agriculture affects the environment, the measure of proper stewardship isn't whether agriculture affects the environment. Rather it is what the farmer chooses to do about those effects.

Moving farms to better locations will be better for the environment. Aquaculture contributes to dissolved nutrient loads (hence affecting water quality) around farms through both fish excrement and uneaten fish food. To achieve sustainable farming, release of nutrients such as nitrogen and phosphorus must be maintained at levels that do not harm marine environments. Though nutrient release per se is not harmful it is important to measure their levels, the effects they have on surrounding systems and the duration of those effects.

It's clear that farmers must expand their embrace of practices that raise fish in harmony with the environment. Relocating the farms is the tool we need to accomplish that goal.



Salvador Delgado Oro Laprida





— RELOCATION OF SALMO FARM IN NARLBOROUGH —

A CHANGE IN THE PHYSICAL LOCATION MIGHT BECAUSE OF  
RISING COSTS AT THE CURRENT FACILITY, BETTER  
TAX BREAKS, BETTER OPPORTUNITY FOR US, FOR  
OUR FAMILY. IT MIGHT ALSO CHANGE IN ITS  
TARGET MARKETS <sup>OR</sup> ~~OFF~~ FOR ANY OTHER REASONS  
THAT COMPANY OR BUSINESS THINK MUCH BETTER  
FOR THE FUTURE & SECURITY FOR ALL THE  
STAFF!



ADALIZA A. DIZA



## Written Comments No: 0268

Subject	<b>Potential relocation of salmon farms in the Marlborough Sounds</b>
From	[REDACTED]
To	aquaculture submissions
Sent	Monday, 20 March 2017 4:37 p.m.
Attachments	<<Salmon Farm Relocation Submission.pdf>>

Please find attached my submission document.

Regards  
Matthew

# Written Comments No: 0268

Salmon Farm Relocation  
Ministry for Primary Industries  
Private Bag 14  
Port Nelson

aquaculture.submissions@mpi.govt.nz

20 March 2017

To: The Salmon Relocation Advisory Panel

Dear Sir/Madam

I am a New Zealand citizen resident in Nelson and I have a family bach in the Marlborough Sounds. I support the potential salmon farm relocation process being proposed by MPI because I believe this relocation will provide for better environmental, social and economic outcomes.

New Zealand's past and future success is heavily reliant on primary industries and well run aquaculture is an excellent example of how we can sustainably produce top quality protein for world markets. NZ King Salmon has a proven history of winning international recognition for its "green" credentials whilst earning good export returns for NZ and generating local employment.

I understand that by relocating farms from lower water flow sites to higher water flows sites fish performance will improve as will the health of the salmon. The relocation proposal also offers the prospect of reduced impacts on the seabed which will have positive environmental benefits.

I have been told that adopting the Best Management Practice guidelines for salmon farms in the Marlborough Sounds that were agreed by the Council and community will align us with the future of aquaculture globally.

There will be many more direct and indirect jobs created in Marlborough and Nelson if this proposal goes ahead resulting in economic improvements for many communities in the top of the south.

Moving some farms away from baches to more remote locations will improve the amenity values of the Marlborough Sounds from both visual and navigation viewpoints.

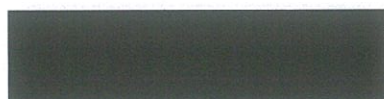
I do not wish to be heard by the hearings panel.

Yours faithfully

Matthew Dodd

Email:

Phone:



# Written Comment No: 0555

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.

## What will this mean to you, and how will this affect your community or organisation?

With natural fish stocks diminishing I believe this is the best way forward for the world in terms of protein intake. My whānau and I appreciate the ongoing development of NZKS and how important it is in supplying the world with a premium product as well as adhering to strict guidelines around Biosecurity. I have no hesitation in giving my full support for NZKS.

I **would/would not** like to be heard by the hearings panel (please cross out the option that does not apply to you).

All written comments must be received by MPI no later than 5pm on Monday 27th March

Name: Nathan Dulan

Organisation/Company: NZKS

Role: FT Diver

Email:

Phone:

Date: 21.03.17



## Written Comment No: 0517

Subject	<b>aquaculture submissions</b>
From	<a href="#">Penny Dollimore</a>
To	aquaculture submissions
Sent	Sunday, 26 March 2017 7:43 p.m.
Attachments	<<Potential_Relocation_of_Salmon_Farms_in_the_Marlborough_Sounds.odt>>

## Potential Relocation of Salmon Farms in the Marlborough Sounds

### COMMENTS FORM

Comments closes 5pm, 27 March, 2017

#### Your details

NAME: penny dollimore

ORGANISATION (if applicable):

CONTACT PERSON: penny dollimore

POSTAL ADDRESS:

EMAIL:

DAYTIME PHONE:

MOBILE:

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

**Comments sent to:** [aquaculture.submissions@mpi.govt.nz](mailto:aquaculture.submissions@mpi.govt.nz)

DATE: **26 /3/17**

I **OPPOSE** the relocation proposal for the following reasons:

Issue	Comment
1. Process	<ul style="list-style-type: none"><li>• The use of Section 360A of the RMA gives the Minister of Aquaculture the power to over-ride the Marlborough Sounds Resource Management Plan.</li><li>• It takes decision-making and resource management away from the Marlborough District Council and local community.</li><li>• 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.</li><li>• 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.</li><li>• 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.</li></ul>
2. Precautionary approach	<ul style="list-style-type: none"><li>• Policy 3 of the NZ Coastal Policy Statement calls for a precautionary approach. This was reinforced by the BOI decision [par 179].</li><li>• 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]</li><li>• This especially applies to Tio Point, which would be the fourth salmon</li></ul>

## Written Comment No: 0517

	<p>farm in close proximity in Tory Channel.</p> <ul style="list-style-type: none"> <li>• In the meantime reduce the feed and stocking rates at the low flow sites to meet the Benthic Guidelines.</li> </ul>
3. Nitrogen pollution	<ul style="list-style-type: none"> <li>• 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.</li> <li>• The proposed relocation sites are not "existing aquaculture space". They are <b>prohibited</b> to aquaculture.</li> <li>• While farm surface area may remain about the same, there is a proposed five-fold increase in fish feed to 24,600T a year.</li> <li>• 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.<sup>1</sup></li> <li>• 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.</li> <li>• 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.</li> </ul>
4. Offshore Alternatives	<ul style="list-style-type: none"> <li>• The NZKS Supreme Court decision ruled there was an obligation to</li> </ul>

<sup>1</sup>BOI [par 379] Nitrogen equivalent calculations



## Written Comment No: 0517

	<p>consider alternatives under the NZ Coastal Policy Statement and Section 32 of the RMA. <b>"Particularly where the applicant for a plan change is seeking exclusive use of a public resource for private gain."</b> [SC 172-173]</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> </ul>
5. King shag	<ul style="list-style-type: none"> <li>• Policy 11 of the NZ Coastal Policy Statement calls for protection of indigenous species in the coastal environment.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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</li> </ul>

## Written Comment No: 0517

	five farms in the King Shag foraging area.
6. Landscape and Cumulative effects	<ul style="list-style-type: none"><li>• This proposal will degrade the Outstanding Natural Landscapes and High Natural Character values of the Waitata Reach. <sup>2</sup></li><li>• 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]</li><li>• 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.</li></ul>

**Further comment: I am very concerned about the future health of the Marlborough sounds seaways and surrounds.**

**"This whole idea is to the detriment of the Pelorus Sound,**

The salmon working group was set up last year, in response to a Cawthron Institute report which revealed King Salmon's Forsyth, Ruakaka and Otanerau farms were not running in a way that enabled them to meet best management practice guidelines

**We must not make mistakes we cannot fix**

**In conclusion:**

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<sup>2</sup>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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There should be no 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.