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## Written Comments No: 0143

Subject	THE POTENTIAL RELOCATION OF SALMON FARMS IN THE MARLBOROUGH SOUNDS
From	Lauraine Jacobs
To	aquaculture submissions
Sent	Wednesday, 1 March 2017 6:45 p.m.
Attachments	<<THE POTENTIAL RELOCATION OF SALMON FARMS IN THE MARLBOROUGH SOUNDS.docx>>

To whom it may concern at MPI

Please find attached my submission for the above consultation.

Regards  
Lauraine Jacobs

[REDACTED]

## THE POTENTIAL RELOCATION OF SALMON FARMS IN THE MARLBOROUGH SOUNDS

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

I am writing in support of the application from NZ King Salmon which proposes the move of their salmon farms to more suitable sites within the Sounds.

I have been writing about food in New Zealand for over thirty years and am passionate about the fine food our farmers, growers and artisan producers offer to both the local and the international market. I was a member of the NZ Government Food and Beverage Task Force in 2006 and at this time I had the opportunity to view the complete food production scene of New Zealand. It became very obvious at that time that one of the advantages our country has in food production is that given the right opportunities we can produce food that is superior in freshness and has more integrity than most other countries can possibly do. I believe that MPI does a very good job in monitoring and assisting the food industry to reach the highest standards to achieve excellence.

We need to maintain and indeed increase food production, while carefully watching that every step taken is a sustainable step and is in sympathy with the land and sea. I have long admired the aquaculture industry's efforts to grow, and in particular have been impressed with the directions the salmon aquaculture industry and New Zealand King Salmon has moved in. If we are to feed the world with food that is of the highest quality and consequently attain the premium prices for this fine food, our economy will continue to thrive.

I have visited salmon farms in the Marlborough sounds and been impressed with the care taken and the quality of the fish. By moving the farms to sites further out, where the faster flow water will be even more suitable, I am sure the fish will be even more consistent, of even higher quality and will fit with the most up-to-date best practice criteria. It is my observation that aquaculture is one of the most underestimated industries, as growing fish is done in a quiet, unobtrusive manner as the fish quietly grow without spoiling the landscape and with almost no visual impact. The well managed present farms cover a very tiny area, and the future sites will have almost no effect on the residents, tourists or visitors to the region.

New Zealand's future well-being and continued growth of the economy depends on the management, practices and promotion of our food production companies and we must support them. The NZ King Salmon Company have been very innovative in many ways and is one of the most exemplary companies within our food industry. Their Ora King Salmon brand has delivered excellent premium fish to the foodservice industry, and through promotions and work with both top end local chefs and well regarded chefs in export markets such as USA, Japan and Europe that brand has been established and is highly respected. And in local markets the NZKS Regal brand is equally well regarded. We must continue to assist the company in their fine efforts and I am sure the proposed new sites will help them to grow and to continue to deliver the finest king salmon in the world to the world.

I know from my travels and my international association with many in the culinary industry that the world presently is falling in love with New Zealand food. It is my prediction that in the very near

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future food tourism or culinary tourism will be one of the greatest growth areas of our economy. NZKS have led the way in helping to achieve this by their Ora King Salmon Ambassador programme for NZ chef and international chefs. It is vital that all steps are taken to support this, and to allow their company to grow.

It is vital we keep food production in New Zealand at the top of the list for the well-being of future generations and that we maintain our position in exporting premium value-added produce that attracts premium prices. I understand that by moving the salmon farms to more suitable water space, as outlined in the documents I have read on the MPI website, the NZKS company will continue to grow and to meet the high standards of production that they have displayed in all my contacts with them.

(I am very happy to meet with the Advisory Panel to clarify and reinforce my views,)



----- Original Message -----

From: Bev James [REDACTED]

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

Date: 26 March 2017 at 17:09

Subject: submission potential reallocation of salmon farms

Hello

attached is my submission

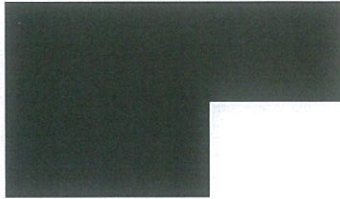
best wishes

Bev James

**Submission: Potential reallocation of salmon farms  
in the Marlborough Sounds**

From:

Bev James



Marlborough 7244

I am a Marlborough resident.

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

Date: 26 March, 2017.

Signed:

A handwritten signature in blue ink, appearing to read 'B. James'.

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

This is a decision-making matter for the Marlborough District Council and the Marlborough community. These are the most affected parties and it must be their decision. It sets a dangerous precedent, if the Minister is able to take away this decision-making power from the community and its elected council representatives.

This proposal would give a competitive advantage to one company over others. It also privileges the interests in and use of the water by this one company, over and above the uses and interests of other parties in the Sounds, which is after all, public space. This public space must be protected and managed for all, not for a privileged few. The Sounds are used for recreational and commercial fishing, boating, and other water activities and are an important tourism destination, renowned for their beauty and tranquillity.

The proposal does not consider the adverse impacts on the King Shag, a nationally endangered species, which relies on the waters of the Sounds for its food and breeding areas.

The environmental impacts are potentially significant. These 6 new salmon farms will discharge untreated salmon faeces into the water. This company would be doing what no other commercial activity or residents are allowed to do, i.e. discharge pollutants into the Sounds. The MPI website states that currently, "There are 6 consented salmon farms in lower-flow areas, and these will have difficulty complying with the guidelines without significantly reducing production". This statement implies that currently the company is struggling to comply with the benthic best practice guidelines. What evidence is there that the company will comply with these guidelines in the new sites?

## **Conclusion**

Why have these proposed regulations been developed? They are wrong, because they:

- Disregard the 2013 Board of Inquiry and 2014 Supreme Court decisions about the expansion of salmon farming into prohibited areas of the Marlborough Sounds.
- Ignore the rights, powers and responsibilities of the Marlborough District Council, its policies and plans.
- Privilege one commercial user when other parties, including previous marine farm applicants have had to abide by restrictions. This is inherently unfair.
- Introduce salmon farming to an area where aquaculture is currently prohibited.
- Do not take a precautionary approach to consideration of marine farm development.
- Would result in a significant increase in salmon being farmed in the Sounds, with associated environmental degradation caused by increased fish densities and wastes.

The Sounds have an incredibly beautiful, diverse and highly complex marine ecological environment, which is fragile and vulnerable to damage. Unfortunately, these proposed regulations appear to be detrimental, rather than protective.

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

## Written Comment No: 0346

Subject	<b>Submission on salmon farming expansion</b>
From	
To	aquaculture submissions
Sent	Monday, 27 March 2017 12:46 p.m.
Attachments	<<Submission Joop Jansen.doc>>

See attached document.



## Written Comment No: 0346

### Submission on proposed use of Section 360A of the RMA to allow massive expansion of salmon farming in the Marlborough Sounds.

Name	Joop Jansen		
Address	[REDACTED]		
	Marlborough Sounds		
Email	[REDACTED]		
Telephone (day)	[REDACTED]	Mobile	
✓	I am against the whole Ministry for Primary Industries (MPI) proposal for "Potential Relocation of Salmon Farms in the Marlborough Sounds"		
✓	I would like to speak to my written submission at a public hearing preferably in the Sounds		

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 reasons why I oppose the proposal can be summarized as:

1. The process to decide what to do about salmon farming (of which this submission and the subsequent hearing is a part) is fundamentally flawed and undemocratic.
2. Salmon farming has had a detrimental effect on the marine environment of the Sounds. More salmon farming will cause more harm.
3. All new farms in the Waitata Reach will be in or near a CMZ1 zone where marine farming is prohibited and will be surrounded by Outstanding Natural Landscapes. Having marine farms there will throw all environmental protection out of the window.
4. Mid channel farms are a hazard to navigation and should therefore be prohibited.
5. Salmon are fed ground up fish protein sourced from overseas and mostly from third world countries. Catching this feed is part of the world wide over-fishing problem and dwindling wild fish stocks in our oceans.
6. The water in the Pelorus Sound is too warm for successful salmon farming.

The following is a short expansion of this summary.

- 1.1 The whole consultation process, starting with the workgroup, has from the beginning been a marketing exercise led by MPI and NZKS to sell and promote salmon farming expansion. The preparations for this started probably soon after the Board of Inquiry finished and MPI's claim to be an independent facilitator was laughable at best. All 'expert' reports are favourable towards salmon farming and salmon farming expansion and the opinion of the community representatives in the workgroup was largely ignored.
- 1.2 The Marlborough Sounds Resource Management Plan is and will be developed for the Marlborough Sounds and its residents and thus by the MDC. A central government minister can ask, but not demand changes to that plan. As it is now proposed, we (MDC and residents) are going to be dictated, in a Trump style, what to do by the minister and by executive order. The 'consultation' process is a farce, right from the beginning and is only there because the law demands it. The decision what to do was taken years ago and that will be done, no matter what the outcome of this 'consultation' process will be.



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- 2.1 The seabed under and adjacent to the salmon farms (bentic) will be polluted by salmon faeces and the fish feed that falls through the pen netting. Over time this will cause all organisms in and on the bentic to die, creating a dead-zone (AS levels 6 and 7). How long it will take NZKS to reach that point is unclear, but considering their track record so far, they will over-stock their farms and reach these levels in a few years time. What that means for the surrounding marine environments is at the moment demonstrated in Tasmania where the dead-zones from salmon farming have penetrated into adjacent marine parks.
- 2.2 The water of the Sounds (water column) will be polluted in the same way as the bentic: by the waste products from the farms. From the experience in Tory Channel we have learned that salmon farming increases the occurrence of toxic algal blooms, because the nitrate levels in the water column are increased. The proposed massive expansion of salmon farming in the entrance to the Pelorus will elevate the chance of an algal bloom throughout this Sound. When that happens it will have a devastating effect on both recreational fishing and the mussel farming industry.
- 2.3 As the farmed salmon are stressed, because of stocking densities, high water temperatures, etc, they are vulnerable to diseases like Rickettsia. A disease that already has decimated several farms over the last couple of years. This disease (and others) might spread to the local wild fish-species (red snapper, blue cod, etc) and even to some shell fish species (scallops). More research has to be done into this, before salmon farm expansion can be considered.
- 2.4 Large congregations of farmed fish, like salmon, attract predators like seals and sharks. When that happens on a large scale in the entrance of the Pelorus this will have a very negative effect on the local and migratory fish. Simply put: when these predators can not get their teeth into the salmon they will eat anything that is in the area. The red snapper (migratory fish) won't be able to get in or out of the Pelorus, thus disrupting their breeding cycle.
- 3.1 The entrance of the Pelorus Sound is the living and feeding habitat of the King Shags, an endangered and therefore protected bird species. Locating salmon farming in that area will disrupt their habitat. This shag is a shy bird that will be spooked by the noise and the farm structures (lights at night). Furthermore, water pollution and the presence of extra predators (seals and sharks) might deplete their food source, while, worse, a toxic algal bloom will wipe them out all together.
- 3.2 The majority of the Pelorus farms are situated in a CMZ1 zone. A CMZ1 zone is an area where aquaculture is prohibited in order to protect unique marine habitats or to give wild fish stocks a place to breed. To ignore this is irresponsible, to put it mildly and flies in the face of conservation and is another nail in the coffin of New Zealand's 'green and clean' image.
- 3.3 The coast surrounding the Waitata Reach is recognised as an Outstanding Natural Landscape by the New Zealand Coastal Policy Statement. The visual and noise pollution, produced by operating salmon farming, will degrade this. Especially the noise, generated by generators, waterblasters, radio's etc, will be considerable and, as everybody knows, sound travels far and wide over water.
- 4 Mid channel farms (when one is accepted, there will be more in the future and not necessarily salmon farms) will be a hazard to navigation, comparable to large wrecks. To safeguard against accidents they will need the same sort of navigation / hazard lights as such wrecks (at least 4 large black and yellow buys with proper lights). This will have a heavy impact on the landscape value of the surrounding coast (wasn't that a Outstanding Natural Landscape?). Furthermore larger ships (cruise boats) and large and heavy barges (with logs) will have trouble navigating the Pelorus entrance in heavy weather. The type of weather that occurs regularly in Cook Strait and surroundings.
- 5 Part of the feed for salmon is sourced from overseas and is protein from ground up small fish. Catching these small fish contributes to the world wide over-fishing problem and the dwindling fish stocks in our oceans. The irony is: in the third world they end up with an empty sea and we end up with a polluted marine environment, thanks to the salmon feed containing their fish. A great example of a loose-loose situation.



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Furthermore the use of fish in the salmon feed makes a mockery of the claims by fish farmers that what they do is healthy for our marine environment, because they claim to take the pressure of wild fish stocks. Nonsense, that claim would only be valid if they would be farming vegetarian fish.

- 6 In the summer the water in the Pelorus Sound (including the entrance) is over 17°C for a minimum of 3 months. It's well known that the Chinook salmon starts to become stressed when the water temperature rises above 17°C weakening the fish and making it vulnerable to disease. For the juvenile fish (smolt) this situation is even worse: they not only get stressed, they will start dieing after a couple of weeks. A higher waterflow does not alleviate this problem, because it does not lower the temperature! That higher water flow only widens the pollution footprint (bentic) and causes the solid waste particles to be spread (much) further. NZKS is only interested in higher flow farms so they can up the stocking density and thus produce more profit for their investors (still mostly overseas). The higher flow will do nothing to reduce the appalling mortality rate in the NZKS farms (13% or more in the last couple of years).

So, relocating any farm to the Waitata Reach will do nothing to prevent diseases like Rickettsia decimating the farms year after year. Add to this Global Warming and it must become clear to everybody that the Sounds are unsuitable for salmon farming. It is unsuitable now and even more so in the (near) future.

My overall conclusion is: Why expand a doomed industry (salmon farming) in a relative pristine environment (the Marlborough Sounds) and have it wreck this environment while the company (NZKS) takes its time to die (propped up by the Central Government = taxpayer money).

In New Zealand salmon farming can, realistically, only be done on land in a completely controlled environment (both temperature and pollution) and that is the solution NZKS should be aiming for if it wants to survive. NZKS should start to grow up as a company and move away from their habitual slash and burn stile of farming to a more scientific sound and sustainable way of farming. They should have started on this track 5 years ago, after the BOI, but if they start right now they might avoid going under.

***The proposal, as it stands, is fundamentally flawed, environmentally unsustainable and should not proceed!***

## Written Comments No: 0360

Subject	<b>EDS submission</b>
From	<a href="#">H. Janssen</a>
To	aquaculture.submissions@mpi.govt.nz
Sent	Monday, 27 March 2017 11:15 PM
Attachments	<<Submission EDS.docx>>

Dear Madam, Sir

Please accept my submission, attached.

--

H. Janssen  
Ecosystem Scientist

Adaptive Resource Management Ltd.  
Resource Information & Integrated Management

[www.bushvitality.org.nz](http://www.bushvitality.org.nz)

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## Potential Relocation of Salmon Farms in the Marlborough Sounds

### My details

NAME: H Janssen

ORGANISATION (if applicable):

CONTACT PERSON:

POSTAL ADDRESS: [REDACTED]

EMAIL: [REDACTED]

DAYTIME PHONE: [REDACTED]

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

DATE: 27 March 2007

### 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</li></ul>

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	<p>years before any more space is considered. [consistent with BOI Condition of Consent 44a]</p> <ul style="list-style-type: none"> <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 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 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. 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>

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



## Written Comments No: 0360

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>

### 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.

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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.

Subject	MPI SALMON RELOCATION PROJECT SUBMISSION
From	[REDACTED]
To	aquaculture submissions
Sent	Friday, 10 March 2017 6:05 a.m.
Attachments	<<Helena SubmissionSalmonFarmRelocation).docx>>

Good Morning

I have attached my submission Re MPI Salmon Farm Relocation.

Kind Regards

Helena Jeffrey

Helena Jeffrey, *Orders Co-ordinator.*



| M: [REDACTED] | W: [www.kingsalmon.co.nz](http://www.kingsalmon.co.nz) | A: 31 Bullen Street, Tahunanui, 7011



ŌRA KING™



# Written Comment No: 0173

Salmon Farm Relocation

Ministry for Primary Industries

Private Bag 14

Port Nelson

aquaculture.submissions@mpi.govt.nz

To: The Salmon Relocation Advisory Panel

Hi

My name is Helena Jeffrey

I have worked at New Zealand King salmon for 16 years. I was originally a nurse and came to Work at NZKS until I got a new nursing job. I loved it so much I am still here 16 years later. I started working in the factory but soon got promoted to a production activity controller roll. I then moved into the planning office and worked helping out with production planning. After this I got promoted again and moved to logistics where I am a team leader and also raise all our Export documents. NZKS is a great company to work for that offers lots of employment opportunities in the Nelson and Marlborough Areas. It offers room to grow with in the company and are always supportive of their staff.

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.

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

Name: Helena Anne Jeffrey

Email: [REDACTED]

Date: 10/03/2017

Phone: [REDACTED]

## Written Comment No: 0177

Subject	salmon farm expansion submission
From	[REDACTED]
To	aquaculture submissions; Kristina & Paul
Sent	Friday, 10 March 2017 1:02 p.m.
Attachments	<<Jensen.pdf>>

see attachment

## Written Comment No: 0177

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

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

Submission on proposed use of Section 360A of the RMA to allow massive expansion of salmon farming in the Marlborough Sounds.

Name of Submitter in full KRISTINA JENSEN

Address

Email

Telephone (day)

Mobile

<input checked="" type="checkbox"/>	I am against the whole Ministry for Primary Industries (MPI) proposal for "Potential Relocation of Salmon Farms in the Marlborough Sounds"
<input checked="" type="checkbox"/>	I would like to speak to my written submission at a public hearing in <u>Waitatia Bay</u>
<input type="checkbox"/>	I do not want to speak to my written submission at a public hearing <u>Kaipara</u>

### 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 did not limit*

## Written Comment No: 0177

In 2012 NZKS applied for nine new salmon farms in areas prohibited for salmon farming via a Board of Inquiry process. They were ultimately allowed three farms. The Board of Inquiry, and then the Supreme Court, made a number of very important findings, which, it is submitted; this proposal is attempting to ride rough shod over.

It is submitted that this is a blatant attempt to try and achieve for NZKS what it failed to get last time around. This time it is being done under the cloak of a relocation scheme. It is submitted that this is a relocation is factually wrong. Two of the salmon farms to be "relocated" do not in fact exist – there has been no salmon farming on the sites for at least five years.

Once again, MPI and NZKS are trying to put new salmon farm sites into outstanding natural landscapes and, it is submitted, ignoring the legal requirements of the New Zealand Coastal Policy Statement and the adverse cumulative impacts on the this iconic landscape.

This proposal, we submit, ignores the Board of Inquiry finding a threshold limit of two new farms in the Waitata Reach and that the Environment Court subsequently echoed this.

### ***The best Place for Salmon Farming?***

The existing NZKS operations are suffering from regular (4 in the last 5 years) unusual mortality events. There is a Controlled Area Notice under the Biosecurity Act in place as a result. Pathogens new to NZ have been discovered in the dead salmon.

We submit that the science shows that 17 degrees Celsius is the maximum sustainable temperature for salmon farming, above this trigger the fish become stressed and vulnerable to disease. MDC records show that the Waitata Reach of the Pelorus Sound has summer seawater temperatures exceeding 17 degrees for long periods. These adverse environmental factors combined with poor management practices is, we submit, demonstrated by these regular significant salmon mortality events.

Instead of allocating clean unspoiled water space for new farms and closing old farms, real pressure should be put on NZKS to operate these existing farms in accordance with Best Management Practice Guidelines. It can be done we submit.

Rather, MPI and NZKS seem to be arguing that the prospect of more jobs and profit justifies ignoring adverse cumulative environmental effects in this iconic public space. This so called MPI report is, we submit, paid for by NZKS using an expert who has a history of working for that company. A truly independent review of this report will, like last time, we submit, show these claims are greatly inflated.

This approach quite wrongly, we submit, gives no credence to the adverse impacts on; endangered species such as the King Shag, recreational users, navigation issues, tourism, and struggling nearby scallop beds.

Other objections:

*Salmon farming unsustainable*

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



## Written Comment No: 0316

Subject	Submission
From	<a href="#">Zed Bullie</a>
To	aquaculture submissions
Sent	Thursday, 23 March 2017 4:47 PM

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: Lynne Cheryl Johansson

Address:

Picton

Email:

Telephone (day) Mobile:

I am against the whole Ministry for Primary Industries (MPI) proposal for "Potential Relocation of Salmon Farms in the Marlborough Sounds"

I do not want to speak to my written submission at a public hearing

To the Marlborough Salmon Farm Relocation Advisory Panel and Minister Nathan Guy:

I am writing to express my dismay about Minister Nathan Guy's proposal to overrule the Marlborough District Council's (MDC) plan and allow for up to six new salmon farms in areas prohibited for aquaculture in the Marlborough Sounds.

The MDC's State of the Environment Report 2015 noted that:

§ The Marlborough Sounds biodiversity is NOT in good shape.

§ The issues include: fewer fish, not as many species, serious loss of biogenic habitats, sedimentation in estuaries and biosecurity incursions.

The Marlborough Sounds needs proposals for protection and restoration of its natural environment and marine ecosystem, NOT proposals for further exploitation and degradation such as this one.

It is submitted that the aim of this MPI proposal, thinly disguised as salmon-farming relocation, is in fact a proposal for the massive expansion of salmon farming in the Waitata Reach area of the Pelorus Sound.

If successful it will mean a cluster of 7 farms in Waitata Reach. It will mean 2 to 3 times more waste discharge spread over a wider benthic footprint. It will mean greater adverse cumulative impacts on the water column.

The Marlborough Sounds needs, we submit, more extensive Marine Reserves, NOT more Salmon Farms on an industrial scale as is now proposed by MPI and New Zealand King Salmon (NZKS).

The Board of Inquiry drew the limits

In 2012 NZKS applied for nine new salmon farms in areas prohibited for salmon farming via a Board of Inquiry process. They were ultimately allowed three farms. The Board of Inquiry, and then the Supreme Court, made a number of very important findings, which, it is submitted; this proposal is attempting to ride rough shod over.

It is submitted that this is a blatant attempt to try and achieve for NZKS what it failed to get last time around. This time it is being done under the cloak of a relocation scheme. It is submitted that this is a relocation is factually wrong. Two of the salmon farms to be "relocated" do not in fact exist – there has been no salmon farming on the sites for at least five years.

Once again, MPI and NZKS are trying to put new salmon farm sites into outstanding natural landscapes and, it is submitted, ignoring the legal requirements of the New Zealand Coastal Policy Statement and the adverse cumulative impacts on the this iconic landscape.

This proposal, we submit, ignores the Board of Inquiry finding a threshold limit of two new farms in the Waitata Reach and that the Environment Court subsequently echoed this.

The best Place for Salmon Farming?

## Written Comment No: 0316

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 Comments No: 0355

Subject	<b>Aquaculture submission to MPI</b>
From	<a href="#">ian johnson</a>
To	aquaculture submissions
Sent	Friday, 24 March 2017 8:59 AM

As shareholders of NZ King Salmon, we are enthusiastic to see any moves take place that will improve the outlook of the business, the environment for the community, and the quality of the species. We are therefore hopeful the scheme relocation process can be approved.

Yours faithfully,

Ian Philip Johnson / Yvonne Elva Johnson

[REDACTED]

Tokoroa [REDACTED]



## Written Comments No: 0326

Subject	<b>Proposed Farm Relocation</b>
From	<a href="#">Sue Stevens</a>
To	aquaculture submissions
Sent	Monday, 27 March 2017 2:22 PM
Attachments	<<SC252 C253017032713010.pdf>>



# Written Comments No: 0326

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

aquaculture.submissions@mpi.govt.nz

To: The Salmon Relocation Advisory Panel

## Introduction – (please add your name / 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?

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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: Dennis Jones  
Organisation/Company: NZ KS  
Role: net cleaner

Email:

Phone:

Date: 23.3.17