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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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Potential relocation of salmon farms in the Marlborough Sounds.

Levi Hone Rawiri Henry.

[REDACTED]

[REDACTED]

I have been working at New Zealand king salmon for nearly 4 years. I support the moving of the salmon farms to better sites as this will improve a lot for everyone that is apart of king salmon, more fish more sales better quality of fish to help push sales up and more jobs for the nelson/ Marlborough area. I think if this all goes ahead this will improve the environment of the sounds which will keep everyone happy.

Levi Hone Rawiri Henry.

MA 16/02/17.

Written Comments No: 0292

Subject	Salmon relocation submission.
From	Adam Hicks
To	aquaculture submissions
Sent	Wednesday, 22 March 2017 4:41 PM
Attachments	<<Salmon Relocation Submission.docx>>

Good afternoon,

Please accept this as my submission on the salmon farm relocation consultation.

Kind regards.

Adam Hicks | Communications Manager | **Aquaculture New Zealand**

Phone DDI [REDACTED]



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Written Comments No: 0292

27 March 2017

Salmon Farm Relocation
Ministry for Primary Industries
Private Bag 14
Port Nelson 7042
<mailto:aquaculture.submissions@mpi.govt.nz>

Submission on Potential Relocation of Salmon Farms in the Marlborough Sounds

Submitter Details

Full Name of Submitter

MR Adam Hicks

Email

[REDACTED]

Phone Number(s)

[REDACTED]

1.0 Introduction

- 1.1 I have a particular interest in the salmon farm relocation proposal because I work for Aquaculture New Zealand.
- 1.2 I support the submission of Aquaculture New Zealand (AQNZ).
- 1.3 I would not like to speak to my written comments at a public hearing.

2.0 Expression of General Support

- 2.1 I generally support the principles of the proposed salmon farm relocation regulation and plan changes.
- 2.2 Aquaculture makes a significant contribution to the communities of the Marlborough region and salmon farming is an important part of this, offering stable employment and supporting a range of local business and community activities.
- 2.3 The New Zealand aquaculture industry respects and values the waters it farms in and is well known for producing high quality seafood with the lightest touch on the environment. Salmon farming is one of the most sustainable sources of quality protein on the planet and this has been recognized through Monterey Bay Aquarium's Seafood Watch 'Best Choice' rating.
- 2.4 New Zealand's King (Chinook) salmon is recognised both at home and worldwide as a premium species of salmon and is highly valued across a range of consumers, from kiwi backyard BBQs to Michelin starred restaurants. It is also packed full of essential nutrients and has one of the highest natural oil contents of all salmon varieties, making

it a quality source of Omega 3s.

- 2.5 Salmon farming is an industry we can be proud of and at the same time be excited about for our future.

3.0 Key Messages

- 3.1 I agree with the potential benefits that have been identified in the proposal, particularly to:

- 3.1.1. Ensure the environmental outcomes from salmon farming are improved through implementation of benthic best management practice;
- 3.1.2. Improve the social and cultural outcomes from salmon farming by creating jobs and moving salmon farms away from areas of high competing use;
- 3.1.3. Increase the economic benefits from salmon farming.

- 3.2 The particular principles I support include:

- 3.2.1 Support for the Best Management Practice guidelines for salmon farms in the Marlborough Sounds which were developed collaboratively with the community and experts to ensure well managed salmon farming in balance with the ecology of the Marlborough Sounds.
- 3.2.2 Recognition that a better operating environment, ie higher flow, cooler water, means better environmental, operational and animal husbandry outcomes for salmon farming in general and particularly for New Zealand's King (Chinook) salmon species.
- 3.2.3 Recognition that low flow, warmer sites constrain the ability for a salmon farming operation to meet the Best Management Practice guidelines while maintaining economic viability.
- 3.2.4 Recognition that the substantial suite of analysis that guides the proposal serves to strengthen knowledge and understanding of and for the salmon industry in general and that this brings broader opportunities for New Zealand as a whole.
- 3.2.5 Support for the robust and comprehensive analysis and consultation being carried out as part of the Resource Management Act (RMA) s360 process.

Yours sincerely,

Adam Hicks

Subject	MPI Potential Salmon farm relocation submission
From	[REDACTED]
To	aquaculture submissions
Sent	Monday, 6 March 2017 2:28 p.m.

New Zealand King Salmon farm relocation submission

Petra Higgins
University of Otago

[REDACTED]

[REDACTED] Dunedin

[REDACTED]

Monday, 6th March 2017
Salmon Farm Relocation
Ministry for Primary Industries
Private Bag 14
Port Nelson 7042
New Zealand.

RE: SALMON FARM RELOCATION

I am writing this submission to express my full support to the Ministry of Primary Industries regarding the proposed salmon farm relocation.

My name is Petra Higgins and I am currently in the final year of studying a commerce degree the University of Otago, majoring in economics and finance. During my most recent university break, New Zealand King Salmon (NZKS) were kind enough to offer me summer employment where I was able to assist in their corporate finance office in Nelson. This opportunity gave me the chance to develop and demonstrate the skills I have been learning here at university in a relevant and practical environment. I am truly thankful for such an invaluable and enjoyable experience.

The majority of my time at NZKS was spent assisting the performance and planning manager with an audit of the company's fixed assets, along with other finance/accounting related tasks. During this audit I was required to visit some of the company's salmon farms in the Marlborough sounds, including Otanerau and Ruakaka. I also visited the Takaka Hatchery in Golden bay. On these site visits, it was truly inspiring to meet the NZKS farm managers and employees who were so passionate about sustainable salmon farming. I do not doubt the relocation of the six farms to higher-flow sites will allow NZKS to better implement the recently developed Benthic guidelines, and contribute to further developing a sustainable, productive, and resilient industry.

One does not need to be an economics major to see the benefits of this relocation for both the local economy and New Zealand at large. A more sustainable and productive way of farming is clearly in the best interests of all stakeholders involved, and I sincerely hope to see this improvement implemented.

Provided I'm not needed in Dunedin for my university studies, I would be happy to speak to my submission at the Marlborough Salmon Farm Relocation Advisory hearings if required. If you would like further information, please do not hesitate to make contact via the details provided above.

Kind regards,

Petra Higgins

Written Comments No: 0332

Subject	Potential Relocation of Salmon Farms in the Marlborough Sounds - Feedback Form
From	Frank
To	aquaculture submissions
Sent	Monday, 27 March 2017 2:00 PM
Attachments	<<Potential-Relocation-of-Salmon-Farms-in-the-Marlborough-Sounds-Feedback-form.pdf>>

Good afternoon,

Please find attached our feedback form.

Regards,
Frank Higgott & Susan Caldwell

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
- 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.

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 checked="" 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

Title: Potential Relocation of Salmon Farms in the Marlborough Sounds

Name: Frank HIGGOTT and Susan CALDWELL

Organisation Name: -

Contact details: [REDACTED] Pelorus Sound

Ph: [REDACTED] email: [REDACTED]

Our preferred location for attending a hearing and meeting with the panel is Havelock. If there is no hearing located at Havelock, then the next preferred location is Blenheim.

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

Question 2:

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

None

Question 3:

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

None

Question 4:

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

Five of the six potential relocation sites are located in CMZ 1 of the Marlborough Sounds Resource Management Plan. Any further aquaculture/marine farming is prohibited in CMZ 1, as set out by the 2013 Board of Inquiry and 2014 Supreme Court decisions. By allowing relocation to occur you are not only breaking the law, but also destroying outstanding natural character and landscape, and impacting greatly on social, recreational and navigational values. A precedent has already been set with the creation of CMZ 3 in 2013, despite much opposition.

The relocation plan represents further erosion of CMZ 1 and Outstanding Natural Character and Outstanding Natural Features/Landscape by the incremental creep of aquaculture into these valuable areas.

The solution is to ensure all existing salmon farm sites are rehabilitated and re-stocked to a level that meets the Benthic Environmental Quality Standards.

If these actions are unachievable, then the fact is that salmon farming is both economically and environmentally unsustainable in the Marlborough Sounds.

Question 5:

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

There are no benefits at all.

The substantial cost will be to the natural and physical resources and the life-supporting capacity of the waters of the Marlborough Sounds. The MDC's State of the Environment Report 2015 noted that: "Marlborough's marine biodiversity is not in good shape, particularly in the Sounds. The significant issues are: fewer fish, not as many species, serious loss of biogenic habitats, sedimentation in estuaries smothering thousands of hectares of seabed and biosecurity incursions." Any further adverse effect on the seabed, by allowing these relocations to proceed, will undoubtedly result in a cost – the further decline of marine biodiversity in the Sounds.

Question 6:

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

The Best Management Practice guidelines for salmon farms in the Marlborough Sounds: Benthic environmental quality standards and monitoring protocol (2014) have robust processes for both environmental standards and monitoring. The enrichment stage (ES) level, however, at which a salmon farm is destocked and fallowed is too high (ES 5.6). By then the farm is well on its way to 'out gassing' and has heavily polluted the seabed and surrounding waters. Active intervention should occur much earlier in the enrichment process. This ES level should be reduced to 5.0 to ensure a better environmental outcome. ES 5.0 is also stated as the 'biophysical suitability' modelling level for production of salmon in the Summary Assessment of Environmental Effects document.

In addition, there must be compulsory active rehabilitation by the consent holder of any salmon farm sites destocked or left to fallow.

Fish food and additives used to sustain the salmon farms must be free of synthetically derived ingredients that are not fit for human consumption (eg: synthetic astaxanthin).

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?

No it should remain a prohibited activity as set out in the 2013 Board of Inquiry and 2014 Supreme Court decisions. Aquaculture at most of these potential relocation sites is currently a prohibited activity (ie: within CMZ 1 of the MSRMP) AND 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].

As all current salmon farm sites have existing resource consents, the farms should remain where they are and be required to comply with existing consent conditions (AND the Best Management Practice guidelines).

If these actions are unachievable, then the fact is that salmon farming is both economically and environmentally unsustainable in the Marlborough Sounds.

Question 8:

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

While farm surface area may remain about the same, there is a proposed five-fold increase in fish feed to 24,600T a year.

With more feed and more fish, the amount of nitrogen pollution discharged into the Sounds through salmon faeces would also increase. The high-flow farms would be discharging the equivalent of the nitrogen in sewage from a city the size of Christchurch, straight into the sea.¹

¹ BOI [par 379] Nitrogen equivalent calculations

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?

We don't think the sites should be vacated. NZ King Salmon should meet the consent conditions (including Best Management Practice guidelines) at these sites, which have current resource consent. If this is unachievable then salmon farming in the Marlborough Sounds is obviously unsustainable, both environmentally and economically.

If they are vacated, they must first be actively rehabilitated by NZ King Salmon. They should be left empty and any future marine farming prohibited.

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?

No! If the site is vacated and the salmon farming operation relocated elsewhere, then allowing use of the Crail Bay site for aquaculture would amount to an increase in surface area of marine farming. No additional marine farming should be allowed at the Crail Bay site.

Question 11:

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

In principle we agree with adaptive management, but only to allow the improvement of environmental outcomes. In practice this means the environment will first be degraded in order to have a level to improve to.

Staged development is a separate issue, which translates to: a right to ramp up production at an environmental cost. The standards and guidelines (ie: Best Management Practice Guidelines) should already be in place, and be adhered to.

King Salmon boasts that they have been farming salmon in the Sounds for 30 years, yet they still have a 'wait and see' approach to their farming practices. There is no Environmental Monitoring and Adaptive Management Plan in place for these relocation sites. Compliance with best management practice has not been achieved at any of their existing sites.

Question 12:

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

As we don't agree with this relocation proposal in its entirety, we don't wish to comment on proposed regulations for a process which should be halted immediately.

Question 13:

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

Yes. NZ King Salmon have degraded these low-flow sites to the point that their own product can't survive, with no consequences. Compliance with Best Management Practice has not been achieved at any of the existing sites. This proves that stocking salmon farms to a level that achieves financial satisfaction is unachievable.

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?

We don't agree with the relocation of any of them. These existing farms should be rehabilitated, restocked, and required to meet existing consent conditions (including Best Management Practice guidelines). NZKS should not be allowed to just walk away from these sites, leaving them in a polluted state.

If these actions are unachievable, then the fact is that salmon farming is both economically and environmentally unsustainable in the Marlborough Sounds.

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?

Five of the six potential relocation sites are in CMZ 1 of the Marlborough Sounds Resource Management Plan, a zone which is recognised for significant natural character and landscape, recreational and navigational values. Prohibition of further aquaculture in this area (CMZ 1) has already been agreed upon previously through the 2013 Board of Inquiry and 2014 Supreme Court decisions.

The relocation plan represents further erosion of CMZ 1 and Significant Natural Areas by the incremental creep of aquaculture into these valuable areas.

Relocating these farms to 'high-flow' sites will not decrease the amount of waste produced, it will just spread five times more waste over a larger area, covering a larger area of seabed. The effects of this waste will be far-reaching.

Long term, this will have worse environmental outcomes than the low flow sites.

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?

Four of the five sites in Pelorus Sound are in CMZ 1, a zone recognised for outstanding natural character and outstanding natural features/landscapes, both terrestrial and marine. The particular landscape and natural character values have already been recognised. Prohibition of further aquaculture in this area (CMZ 1) has already been agreed upon previously through the 2013 Board of Inquiry and 2014 Supreme Court decisions. Any sites relocated into this area would be illegal .

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?

The Supreme Court made it clear that treating the requirements of the NZ

Coastal Policy Statement as other than paramount when considering landscape values was legally incorrect.

The Board of Inquiry decision identified the threshold number of salmon farms for Waitata Reach as TWO – Waitata and Richmond – and turned down three others because of the cumulative effects on Landscape, Natural Character, King shag feeding and Tangata Whenua values. [BOI 1252]

NZKS and MPI have ignored this ruling, which was arrived at after a long and considered judicial 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.

This proposal will degrade the Outstanding Natural Landscapes and High Natural Character values of the Waitata Reach.

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?

Do not allow the relocation of any salmon farms. NZ King Salmon must rehabilitate and use its existing farm sites that they already have consent for, and ensure they all meet the existing Best Management Practice Guidelines immediately.

If these actions are unachievable, then the fact is that salmon farming is both economically and environmentally unsustainable in the Marlborough Sounds.

Question 19:

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

There is no doubt that the water quality will decline in an area of up to and significantly more than 2km around each site. The proposed sites are situated near the entrance of the Pelorus and Queen Charlotte Sounds, fish faeces and waste feed will be carried in and out of the Sound through the water column, and build up on the seabed. Over time, through nitrification/eutrophication, extreme degradation of our waterway will occur. The effects on water quality in relation to this proposal will be much more than minor.

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?

Yes, withdraw all relocation proposals. If best practice guidelines cannot be met at the sites already allocated then Salmon farming in the Marlborough sounds is unsustainable, both environmentally and economically.

Question 21:

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

Aside from the pollution created from faecal matter and waste, the excess feed which contains synthetic ingredients, (astaxanthin) will be digested by the wild fish causing unnatural changes to the food chain.

The effects on water quality are already well known. Intensive farming will cause nitrification/eutrophication resulting in the irreversible damage to the natural ecosystem.

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/Te Pangu is recognised as an Ecologically Significant Marine Site:

"A stretch of coastline towards the eastern end of Te Pangu Bay is swept by strong tidal currents. This rocky coast supports a variety of filter feeding species including hydroids, sponges and ascidians." (source: MDC)

We have serious concerns about degraded water quality resulting from a relocated salmon farm affecting this Ecologically Significant Marine Site. There is no doubt that these significant marine species will be adversely affected should the relocation proceed.

Any drop in water quality at this site (or any proposed site for that matter) is completely unacceptable.

Question 23:

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

There is no doubt that the seabed will be adversely affected at the potential sites. Relocating salmon farms to high flow sites will not decrease the amount of faecal matter and waste feed. It will in fact disperse the waste over a much larger area. Over time, through nitrification/eutrophication this will see irreversible damage done to the seabed and the ecosystems that rely on it.

King Salmon has no idea of the impacts of their proposed sites on marine ecosystems because they will adopt a 'wait and see' staged adaptive approach to their farming operation.

There should be no new salmon farms approved or relocations undertaken until NZ King Salmon proves it can operate the ones it has within the agreed benthic guidelines.

Question 24:

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

Relocation should not go ahead.

The MDC's State of the Environment Report 2015 noted that: "Marlborough's marine biodiversity is not in good shape, particularly in the Sounds. The significant issues are: fewer fish, not as many species, serious loss of biogenic habitats, sedimentation in estuaries smothering thousands of hectares of seabed and biosecurity incursions." Any further adverse effect on the seabed, by allowing these relocations to proceed, will undoubtedly result in further decline of marine biodiversity in the Sounds.

Question 25:

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

There are many Ecologically Significant Marine Sites in the Marlborough Sounds that are located near the proposed relocation sites, and will be adversely impacted by the relocation proposal.

These sites include (but are not limited to):

In Pelorus Sound: 2.18 Paparoa Point, 3.1 Harris Bay, 3.2 Oke Rock, 3.11 Tapapa, Kauauroa and Tawero Current Communities, 3.3 Duffers Reef, 3.5 Maud Island.

In Queen Charlotte Sound: 5.3 Takatea Point, 5.4 & 5.8 Tory Channel, 5.6 Tio Point/Te Pangu, and 7.15 Whales in the entire QCS area.

King Salmon has no idea of the impacts of their proposed relocation sites on Ecologically Significant Marine Sites because they are planning to adopt a 'wait and see' staged adaptive approach to their farming operation.

There should be no new salmon farms approved or relocations undertaken until NZ King Salmon proves it can operate the ones it has within the agreed benthic guidelines.

Question 26:

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

The MDC's State of the Environment Report 2015 noted that: "Marlborough's marine biodiversity is not in good shape, particularly in the Sounds. The significant issues are: fewer fish, not as many species, serious loss of biogenic habitats, sedimentation in estuaries smothering thousands of hectares of seabed and biosecurity incursions."

There will be huge effects on all fish species (pelagic, demersal and reef). Narrowing the focus to just pelagic fish that inhabit the water column does not give the true effect on natural and physical resources or the life-supporting capacity of the waters of the Marlborough Sounds. The consumption of excess feed which includes synthetic ingredients will be consumed by wild fish.

Question 27:

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

The technical report falls woefully short on any detail regarding any other seabirds aside from king shags, and indeed many seabirds and terrestrial birds that have potential flight paths over these proposed farms to their habitat and breeding sites on pest-free islands and mainland reserves/covenants in the area (eg: Chetwode Islands, Tui Nature Reserve, Maud Island).

In addition no consideration has been given to the effects of light pollution (artificial lighting, building/structure lighting and floodlighting of moored vessels) on these birds. Seabirds are active at night and become disoriented (often fatally) in their usual flight paths due to sources of artificial light. 80% of New Zealand's seabirds are threatened species.

In the Sounds, nationally threatened or at risk seabird species include: little (blue) penguin, sooty shearwater, king shag, pied shag, black shag, little black shag, black fronted tern, white-fronted tern, Caspian tern, fairy prion, fluttering shearwater, black-billed gull, red-billed gull and reef heron.

To state that the proposed salmon farms will have a negligible or 'unmeasurable' effect on these species is incorrect. Many of these species have similar feeding sites and foraging patterns as king shag, and the threat to king shag was a key 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.

Question 28:

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

All of the sites pose a risk to seabirds.

Question 29:

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

A wide variety of marine mammals including dolphins, orca and seals inhabit and visit the Marlborough Sounds. Whales also frequent the Marlborough Sounds, particularly around Tory Channel and Outer Pelorus Sound. All of these species will be impacted by the gradual degradation of their environment and ecosystem from direct discharge and build up of faecal matter and feed waste.

Seals are naturally curious and will cause damage to salmon farm structures in an attempt to obtain food. We have concerns about the welfare and treatment of seals around salmon farms.

Question 30:

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

Apart from the Waitata Mid Channel and Tio Point sites posing a direct navigational risk to marine mammals such as whales, dolphins, orca and seals, all of the proposed sites pose a combined detrimental effect on the seabed and water quality, compromising the sustainability of natural food sources available to marine mammals - therefore the risk to marine mammals is huge.

Question 31:

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

Yes. We have concerns that pathogens and marine pest organisms from farmed fish will be transmitted to wild fish populations and spread through the water column throughout the Sounds. Nutrient overload from salmon farms causes seabed enrichment, which then can lead to algal blooms and can also create a novel habitat for pathogens, infectious disease, and marine pest organisms to establish.

There are existing Controlled Area Notices for salmon farms in both Pelorus and Queen Charlotte Sounds, due to salmon mortality events at existing farms. This means no equipment or fish can be moved outside of these areas – NZ King Salmon must not be allowed to move anything from these Controlled Area sites to any other site.

A biosecurity breach or incursion of any kind would have devastating effects on marine life in the Marlborough Sounds.

Question 32:

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

We are not convinced that salmon health will be improved by the relocation proposal.

Intensively farmed salmon harbour infectious diseases that create a hazard to wild fish populations and aquatic life.

Farming salmon intensively causes stress to the farmed fish, a build up of cortisol in the fish, which can lead to bacterial outbreak, parasites and disease, and eventually, mortality events. Farmed salmon live in a crowded, stressful environment, where they endure the presence of aggressive fish, a battle for food, and sporadic changes in lighting, water temperature, and currents. Many fish simply lose the will to live and 'drop out', eventually dying.

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 all potential relocation sites effect navigation by limiting the space for vessels to manoeuvre, especially the Waitata mid-channel site. When the wind is from the northerly quarter and a sailing vessel is tacking out of Pelorus Sound, every inch of this narrow reach is needed to take the opportunity to make ground against the wind. The same applies tacking into Pelorus Sound when the wind is in the southerly quarter. If King Salmon are given the opportunity to dominate this area they have basically been given the right to block the entrance to Pelorus Sound. You are taking an intrinsic recreational right away from the public as well as creating a dangerous navigational hazard.

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?

The proposed Waitata mid channel site is a hazardous and dangerous blockage to a vessels' safe passage in or out of the Pelorus Sound. See the reply to question 33 above in relation to sailing vessels in particular. Never mind cruise ships or super yachts, what about the intrinsic recreational right of the public to have an unencumbered passage in and out of Pelorus Sound.

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?

Tourism is a growing industry in New Zealand, and in Marlborough. The total visitor spend in Marlborough in 2015/16 was \$365 million, an increase of 7.9% on the previous year (source: MBIE). By far the largest proportion of this was spent on transport, tours and 'experiences' (\$117m). People come to Marlborough to experience the Marlborough Sounds... "home to secluded bays, historic sites, marine reserves and precious island sanctuaries, which foster kiwi and other native species. Cruise or kayak your way through the Marlborough Sounds, home to dolphins, whales, seals and seabirds." (source: Destination Marlborough Trust). Tourism relies heavily on 'natural capital', provides jobs and income to local people, and showcases our region. Relocating the salmon farms to these proposed sites will increase visual, physical and noise pollution, impact on the sense of open space, and impact on intrinsic values. It will turn areas of public space and recreation into noisy industrial sites which discharge waste into the waters of the Sounds. Degradation of water quality will occur, displacing marine life, including fish, marine mammals and seabirds. None of these impacts will have a positive effect on tourism or recreation in the Marlborough Sounds and New Zealand - which relies on natural landscape, wildlife, a sense of remoteness, uninterrupted open spaces and character to attract visitors and provide recreational opportunities. The gradual degradation and industrialisation of New Zealand's greatest asset: "the environment" is a poor decision which will not only damage the reputation of our image worldwide, but will irreversibly damage the natural spaces that make this country special.

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?

Stop the relocation process. Reduce the number of sites dramatically and destock dramatically. Regular independent monitoring of best practice (ie: monthly).

Instant fines/penalties and immediate halt on all farming operations not meeting best practice guidelines.

Question 37:

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

The proposed relocations pose a threat to the mauri and health of the coastal marine ecosystems of the Marlborough Sounds, in particular the Waitata Reach area of Pelorus Sound (Te Hoiere). We fundamentally oppose relocation of these farms due to their impact on wāhi tapu areas and areas of cultural significance such as māhinga kai, māhinga mātaītai and traditional waka routes. The loss of māhinga kai and māhinga mātaītai is a huge issue for the ability of iwi, hapu and whanau to provide kai for manuhiri and an inability to undertake the role of kaitiaki, which means a loss of mana to those iwi, hapu and whanau.

Less salmon farms, not more, would minimise further loss of cultural integrity.

Question 38:

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

Industrial noise from the proposed sites will turn Coastal Marine Zone 1 and areas of outstanding natural character and landscape into an industrial zone. People come to these places to *get away* from the constant whine of industrial noise and the sound of machinery operating.

All the proposed sites will have a generator operating 24/7, and on top of that, intermittent use of machinery and equipment. This means there will be a constant hum of noise pollution from all of the proposed sites (plus the existing salmon farms), all day and all night, every single day of the year.

This is unacceptable. Despite the best acoustic 'modelling', the technical report is based on scenarios and assumptions. The reality is that sound travels a long way in calm conditions – day or night. We live in this area, and the noise from a single barge travelling past, well over one nautical mile away, is significant. The constant noise pollution from not just one, but potentially seven of these farms in the Waitata Reach alone – an area of Outstanding Natural Landscapes and High Natural Character values - will be completely untenable.

The only measure that should be taken is to halt the relocation of all sites.

Question 39:

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

The effects of light pollution – particularly from underwater lighting, but also building/structure lighting and floodlighting of moored vessels, will have an adverse impact on seabirds. Many seabird species are active at night and become disoriented (often fatally) in their usual flight paths due to sources of artificial light.

80% of New Zealand's seabirds are threatened species.

In the Sounds, nationally threatened or at risk bird species include: little (blue) penguin, sooty shearwater, king shag, pied shag, black shag, little black shag, White-fronted tern, Caspian tern, fairy prion, fluttering shearwater, red-billed gull and reef heron.

It is acknowledged that navigational markers/lights on a marine farm are a necessity to assist navigation. However, the use of bright lighting (floodlighting/underwater lighting etc.) at night creates a hazard to navigation by obscuring and diminishing a watch-keepers night vision when they are manning a vessel underway. The glare from lighting on salmon farms operating at night creates a hazard to maritime navigation, particularly at the proposed Waitata mid-channel site.

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?

Natural capital will be irreversibly destroyed, resulting in a drop in tourism numbers and spending, leading to job losses and business failure. Cultural integrity, mauri and health of the waterways will be damaged, resulting in an inability of whanau, hapu and iwi to provide māhinga kai and kai for manuhiri, and leaving these whanau, hapu and iwi unable to achieve their role of kaitiaki. The mana of iwi, hapu and whanau will be adversely affected and this in turn affects the social fabric and sense of community.

In addition, these proposals, coupled with NZ King Salmon's current farming practices will teach the next generation of young people that riding roughshod over legal rulings, and polluting the environment for monetary gain is acceptable.

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

We believe that all parties with a financial interest in any salmon farming business, including New Zealand King Salmon, should not be allowed to be part of any forum set up to report on the effects salmon farming in NZ. This includes all iwi groups with a vested interest. Allowing these parties to have input or influence decision-making would be a complete conflict of interest.

Approving the relocation proposal will:

- take decision-making and resource management away from the Marlborough District Council and local community.
- disregard the 2013 Board of Inquiry [BOI] and 2014 Supreme Court decisions about expansion of salmon farming into prohibited areas of the Marlborough Sounds.
- Increase the amount of nitrogen pollution discharged into the Sounds through salmon faeces. 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.²
- Increase the threat to seabirds, particularly king shag. 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.

NZ King Salmon's 'Grand Vision' for Marlborough includes a floating restaurant and fertiliser plant (Source: 'The Sun', 10 March 2017). Why don't NZ King Salmon focus on improving their environmental outcomes rather than pitching these grandiose ideas to the public? They could start immediately by ensuring all of their existing salmon farms meet agreed best practice.

In conclusion, we oppose the proposed relocation. We would like the Minister and the Advisory Panel to decline Options One and Two of the proposal, and to approve Outcome Three: Not make regulations under section 360A and all existing lower-flow farms remain at their present location.

¹ BOI [par 379] Nitrogen equivalent calculations

Relocation of Salmon Farms in Marlborough Sounds

My name is Pauline Hiki and I have been working for NZKS for nearly 5 years and I support moving the farms from low flow sites to high flow sites. I believe the faster flowing water will improve the quality of our fish because they will be healthier and we will be able to have more fish in the farms because we will have healthier sea beds with less build up of waste. In the long term it will create more employment for the wider community.

Pauline Hiki



A handwritten signature in blue ink, appearing to read 'P. Hiki'.

22.2.2017

Written Comments No: 0267

Subject	relocating salmon farms in the marlborough sounds
From	[REDACTED]
To	aquaculture submissions
Sent	Monday, 20 March 2017 3:35 p.m.

It appears to me that this proposal would be a win win for all. I support the changes

Wayne Hill

[REDACTED]
Invercargill

Written Comments No: 0033

Subject	The Potential Relocation of Salmon Farms in the Marlborough Sounds: Feedback form
From	[REDACTED]
To	aquaculture submissions
Sent	Wednesday, 22 February 2017 9:36 a.m.
Attachments	<<Potential-Relocation-of-Salmon-Farms-in-the-Marlborough-Sounds-Feedback-....pdf>>

Hi there

Please find attached my feedback form on the potential relocation of salmon farms in the Marlborough Sounds.

Kind regards,
Sharon

Sharon Hill | Digital Marketing + Communications
[REDACTED]

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
- 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: 0033

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"/> No	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?

Yes, it makes sense to relocate the farms from an environmental, social/cultural & economic standpoint.

Question 2:

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

They all look good - reasonably near land for shelter and still accessible from Picton and Havelock. Mid channel Waitata looks the least protected & Tio Point looks closest to baches, so may be less suitable. However, I have faith that the selected sites are appropriate and suitable.

Question 3:

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

Waihinau, Forsyth, Crail Bay 1 & 2 - as suggested.

Question 4:

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

No concerns. I have faith that the process to date is taking all relevant factors into consideration and is recommending the best outcome.

Written Comments No: 0033

Question 5:

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

I have faith that the process to date by MPI has identified benefits & costs associated with the relocation.

Question 6:

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

I have faith that any rules, policies or conditions have been considered during the process conducted to date by MPI.

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?

Yes.

Question 8:

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

I think it should be increased if valid reasons are put forward as to why. The farms take up just a tiny area of the Marlborough Sounds and contribute hugely to the economic benefit of Marlborough through jobs & use of Marlborough companies as suppliers, plus puts Marlborough on the world stage as a producer of premium salmon.

Written Comments No: 0033

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 all factors are considered and the area is still deemed suitable, then no I don't think marine farming should be prohibited from the vacated sites.

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?

Yes shellfish farming should be allowed to continue at Crail Bay if all factors are considered and the area is deemed suitable.

Question 11:

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

Yes, that is a sensible approach.

Question 12:

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

I agree with the wording.

Written Comments No: 0033

Question 13:

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

Obviously warmer water and less flow, along with a higher number of baches is a negative issue for the farms at the existing sites. The relocation to cooler, stronger flow sites with fewer baches makes excellent sense.

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?

Anywhere the fish mortalities are highest and the nearby baches are highest in number.

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?

No

Question 16:

Are there particular landscape or natural character values that you want to identify to the Minister for Primary Industries for any of the potential relocation sites?

No

Written Comments No: 0033

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?

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?

Question 19:

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

It is my understanding that NZ King Salmon goes to great lengths to ensure the water quality is kept at the optimal level at all times, across all its farms. The high flow of the potential relocation sites will help in this.

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?

Question 21:

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

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?

Question 23:

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

I have faith that MPI and NZ King Salmon will work together to ensure optimal outcomes for the seabed.

Question 24:

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

Question 25:

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

Question 26:

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

Question 27:

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

Question 28:

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

Question 29:

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

Question 30:

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

Question 31:

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

Sounds like a good idea as salmon farming is quite a specific activity.

Question 32:

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

I am an advocate for animal welfare and safe farming practices, so I am very supportive.

Question 33:

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

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?

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 salmon farms are currently a tourist attraction themselves, so they would continue to be a benefit to Marlborough tourism.

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?

Written Comments No: 0033

Question 37:

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

Question 38:

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

Question 39:

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

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?

I think moving the farms to less residential areas will free up the inner sounds to be more of a purely recreational area - this will likely have positive social and community benefits.

Written Comments No: 0033

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

New Zealand King Salmon's Marlborough salmon farms take up very little surface area of the enormous Marlborough Sounds. In return they provide huge economic benefits to the region, to the top of the South, and to New Zealand. They provide employment, they provide work for a huge range of local and national suppliers, and they produce some of the world's best salmon. New Zealand King Salmon goes to great lengths to ensure farming practices are sustainable, ecologically sound and humane. The farm relocations will ensure they can do this better, more efficiently, and with the least impact possible on the Sounds and its human and marine residents. Farming is the lifeblood of New Zealand and salmon farming is no different, except it takes up less space, produces more protein vs input than landbased farming and in many ways is more environmentally friendly. Any support that can be given to ensure the company can grow and thrive is great in my book.

This image shows a full page of white paper with horizontal blue or grey ruling lines. The lines are evenly spaced and run across the width of the page, leaving small margins at the top and bottom. There is no handwriting or other markings on the paper.

Written Comment No: 0504

From	Budyong Hill
To	aquaculture submissions
Sent	Sunday, 26 March 2017 5:55 p.m.
Attachments	<<Salmon farm submission..docx>>
Subject	King Salmon submission

Please find attached our submission to the Potential relocation of salmon farms in the Marlborough Sounds.

Thankyou, Budyong and Lesley Hill.

Potential Relocation of Salmon Farms in the Marlborough Sounds

COMMENTS FORM

Comments closes 5pm, 27 March, 2017

Your details

NAME: Lesley and Budyong Hill
ORGANISATION (if applicable):
CONTACT PERSON:
POSTAL ADDRESS: [REDACTED] Renwick
EMAIL: [REDACTED]
DAYTIME PHONE: [REDACTED]
MOBILE: [REDACTED]

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

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

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

DATE: **26/03/2017**

I OPPOSE the relocation proposal for the following reasons:

Issue	Comment
1. Process	<ul style="list-style-type: none">The use of Section 360A of the RMA gives the Minister of Aquaculture the power to over-ride the Marlborough Sounds Resource Management Plan.It takes decision-making and resource management away from the

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

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

¹

BOI [par 379] Nitrogen equivalent calculations

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

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

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

Further comment: The recently released OECD report highlights that our environment is under increasing stress due to an economy reliant on primary industries. We are concerned that this proposal may be another area where expansion for purely economic reasons has results that we regret in the future. The projected five-fold increase in fish feed and resulting increase in fish numbers and hence fish waste concerns us. Do we really know what the long term consequences of all that extra nitrogen will be in these enclosed waters? We support the idea of taking a precautionary approach and also looking more seriously at the feasibility of off-shore farming. The Marlborough Sounds are one of the scenic jewels in NZ's crown and should not be polluted for private profit.

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.

Potential relocation of salmon farms in the Marlborough Sounds.

Michael Hingston



I have worked here at nz king salmon for nearly 2 years. I have now got a child on the way and need this job to support my family. I support the relocation of the farms to the new high flow sites because we can grow healthier and high quality fish. Having our farms in high flow areas we will be able to grow more fish without damaging the seabed with excess waste and have better quality water.

Higher quality fish means that I will get a better pay rise, create more jobs and provide security for my family.

Michael Hingston
M Hingston 16/02/2016

Relocating Salmon farms in the Marlborough Sounds.

Tuan Thang Hlawnceu



I think it is a good idea to move the farms to faster flowing water so the fish are healthier and if they stay where they are the fish don't like warm slow running water and won't grow as healthy. If we move the farms we will be able to grow more salmon and they will be happy and better quality. The sea floor in the sounds will be in better condition. We will be able to grow more fish and in a couple of years we will have more jobs for people.

Tuan Thang Hlawnceu 

Written Comment No: 0199

Relocation of salmon farms in the Marlborough sounds.

I support moving the farms to high flow sites because I think it's good for our salmon to be in healthy water, they will grow better and be good quality for people to buy. Make more money for NZ and for King salmon and for me and my family.

Ni lang Hlawnceu



A handwritten signature in blue ink, appearing to be 'Ng'.

27 . 2 . 17

Written Comments No: 0243

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

10 March 2017

To: The Salmon Relocation Advisory Panel

Introduction

I support the potential salmon relocation process being proposed by MPI in Marlborough. This is because I believe the salmon farm relocation will provide for better environmental, social and economic outcomes.

I know and love the Marlborough Sounds since the 1960s and have done a lot of boating there.

I understand by relocating farms from lower water flow sites to higher water flow sites this will improve fish performance and therefore the health of the Salmon. It will also have a lower level of effect on the seabed which has an environmental benefit. Using a (still relatively minuscule) bit of NZ seabed for finfish farms is something NZ should be doing a lot more of.

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 although I perceive no greater rights for bach owners to the sea than other NZers. As a boater I believe it will be straightforward to navigate around these farms.

I support this relocation/development as I believe there will be very considerable social and economic benefits from more Salmon onto local and export markets and community employment and wealth creation. Also I believe the social and economic and environmental benefits far outweigh the relatively minor environmental costs. I have no direct interest or involvement nor any personal benefit, nor do I anticipate any, from my submission and perspective on this. It is simply the right thing to do, I submit.

I do not seek to be heard by the Hearings Panel. Best wishes to all.



Name: Tom Hollings

Date: 10 March 2017



Written Comment No: 0170

Subject	Marlborough Salmon Relocation
From	[REDACTED]
To	aquaculture submissions
Sent	Thursday, 9 March 2017 3:55 p.m.
Attachments	<<Submission - Salmon Farm Relocation.pdf>>

My submission is attached

Thanks

Kim Hooper

Sent from my iPad

Written Comment No: 0170

9 March 2017

Salmon Farm Relocation
Ministry for Primary Industries
Private Bag 14
Port Nelson
aquaculture.submissions@mpi.govt.nz

[REDACTED]
[REDACTED]
Blenheim 7202
[REDACTED]

To whom it may concern

I have lived in Marlborough for the last 31 years. I am currently employed by NZ King Salmon & have been with them for 10 years. In my role I get to liaise with a number of our suppliers & this reveals to me the significance a major player like NZ King Salmon has on the wider business community.

Our prosperity contributes to the prosperity of others.

I fully support the relocation of our low flow sites. This will allow us to grow in a more sustainable manner.

My support is based on the following:

- New Zealand is a primary producer of quality food products. NZ King Salmon plays a significant role in delivering such products to the world. This should be encouraged to grow & prosper.
- Regionally it is important for provinces like Marlborough to be as diversified as possible.
- We need regional economies to be strong & to give locals the opportunity for ongoing employment. Although our main base is in the Nelson/Marlborough area we also have a presence in the two remote areas of Takaka & Southbridge.
- Good sustainable businesses have a positive impact on the local tourism industry.
- The relocations will deliver a long term environmental benefit.

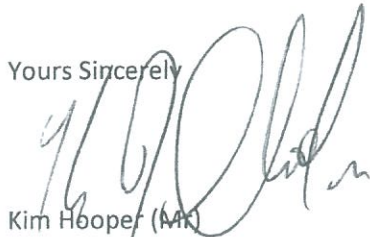
NZ King Salmon is a progressive company that has many positive impacts on the communities it works in. This encompasses sponsorship & community event promotions. They also have an active involvement in the Aquaculture Training industry.

This project is important to secure this industry & its community a positive future. A negative result would not be a sensible result for the region.

Please support these relocations & help our region grow.

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

Yours Sincerely



Kim Hooper (Mā)