

Contents Page: Watson - Wilkinson

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

Written Comments Number	Last Name	First Name
185	Watson	Tony
218	Watson	Virginia
279	Watson	Peter
318	Waves Electrical	
130	Wells	Casey
136	Wells	Mike
137	Wells	Natasha
138	Wells	Sharleen
87	Welsh	Jarnnah
542	Whillans	Barbara and Ian
590	Whillans and Patterson	Jan and Duncan
245	Whitford	Simon
168	Whyte	Betty
180	Wilkinson	Stephen
427	Wilkinson	Selina

Written Comment No: 0185

Subject	Salmon Farm Expansion
From	[REDACTED]
To	aquaculture submissions
Sent	Monday, 13 March 2017 7:22 a.m.
Attachments	<<170306-SubmissionForm.pdf>>

Kenepuru Sound has already been damaged enough. No more please.

Tony Watson

[REDACTED]
[REDACTED]

Written Comment No: 0185

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

Email before 5pm, Monday 27 March 2017
to:
aquaculture.submissions@mpi.govt.nz

Written Comment No: 0185

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	Anthony Brett Watson		
Address	[REDACTED] ASHBURTON 7774		
Email	[REDACTED]		
Telephone (day)	[REDACTED]	Mobile	[REDACTED]

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

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

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

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

- The Marlborough Sounds biodiversity is NOT in good shape.
- The issues include: fewer fish, not as many species, serious loss of biogenic habitats, sedimentation in estuaries and biosecurity incursions.

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

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

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

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

The Board of Inquiry drew the limits

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

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

Written Comment No: 0185

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

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

The best Place for Salmon Farming?

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

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

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

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

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

Other Comments:

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

Written Comments No: 0218

Subject	Salmon Farm relocation
From	[REDACTED]
To	aquaculture submissions
Sent	Wednesday, 15 March 2017 2:59 p.m.

Dear Sir/Madam,

I am submitting in favour of the proposed Salmon farm relocation.

I see this as a sensible and practical solution which will reduce environmental impacts and allow continued development of this high value industry, creating jobs and social good for the region.

Regards

Virginia Watson

[REDACTED]

Nelson

[REDACTED]

Written Comments No: 0279

Subject	Salmon relocation.
From	[REDACTED]
To	aquaculture submissions
Sent	Tuesday, 21 March 2017 12:56 p.m.

To the people of Marlborough and the greater NZ who it should concern.
The proposal to relocate the salmon farms that have damaged the environment they currently sit in to new sites and fast tracked by Minister Nathan Guy is absurd to say the least.

As president of the Marlborough Recreational Fishing Assoc I have available a fair amount of research condemning the actions wanted by NZKS and being pushed by central Govt. The information I have available would be dwindled by science papers and reports flowing across the desks of officials at MPI so i will not digress into these facts rather I will state the obvious and appeal to common sense.

The Marlborough sounds and in Particular the Pelorus sound has too many marine farms that are damaging the environment. I have 40 years experience in the sounds and have seen the slow but sure decline of the ecosystems.

Marine farmers themselves have photographed and documented their own evidence and have in conversation conveyed these observations to me re the destruction. However as they are financially bound they would never disclose the facts they know to higher sources. King Salmon farms were sited at the best possible sites 10 years ago and have proved damaging to the environment as well as producing poor quality fish the said past ten years. Now they wish to move, at one location in particular become a navigation hazard, pollute a different area of the sounds compounding what damage the mussels are doing and produce poor quality fish bound for the new petfood factory NZKS are going to open for what gain? Nothing at all to Marlborough. The new jobs will be mythical and in fact job losses will occur. The new farms inside ten years will be near unmanned and robotic.

If the farms wish to move, move them into offshore locations. The water is cooler and nearer the temp the fish need. The damage to environment would be less and quality of fish would be far greater. The statement that no offshore farming is done by Rosewarne is absurd as offshore farming is all over the globe already. Obviously he believes the people are too stupid to know this and we can yet again pull the wool over the eyes of NZers for a few dollars of profit going offshore.

Regards

Pete Watson

The Gunshack- Inside

Vortex Marine & Outdoors

[REDACTED]

Blenheim

[REDACTED]

[REDACTED]

Marine Repair, Hunting & Outdoor Supply Specialists..

Written Comment No: 0318

Subject	Salmon Farm Relocation
From	Neil Barlow
To	aquaculture submissions
Sent	Thursday, 23 March 2017 5:00 PM
Attachments	<<Letter to Salmon Farm Relocation Panel.docx>>

Good Afternoon,

Please find letter for Salmon Farm Relocation Submission Letter attached. If there is any queries please let me know.

Kind Regards,

Neil Barlow | Waves Electrical (2010) Limited

Picton





23 March 2017

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

aquaculture.submissions@mpi.govt.nz

To: The Salmon Relocation Advisory Panel

Neil Barlow Manager of Waves Electrical

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 flow 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 point of view.

The relocation of these salmon farms will have a positive effect on our business growth and ensure economic improvements and stability, as a result of this we will be able to take on more employees and strengthen the core of our business.

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

Yours Sincerely,

Neil Barlow

Subject	Submissions RE: salmon farm relocation
From	Kristin Spaetzel
To	aquaculture submissions
Sent	Tuesday, 28 February 2017 4:20 p.m.
Attachments	<<C.Wells.pdf>> <<D.Ray.pdf>> <<K.Boaz.pdf>> <<K.Duff.pdf>> <<K.Spaetzel.pdf>> <<M.Leary.pdf>> <<M.Wells.pdf>> <<N.Wells.pdf>> <<S.Guy.pdf>> <<S.Wells.pdf>>

Hi,

I am writing as I have collated a number of submissions from people I know and their friends and family. Each letter is the same, however each individual has signed and dated their own copy to show their support for the idea. I felt this was the easiest way to register the support of a large number of people who are in favor of the idea of moving the sea farms but who would be unlikely to take the time to compose their own personal letter. Hopefully this will even things out as I realize people in favor are less likely to put in a submission than those who are against. Each individual has read and stated that they agree fully with the written statement. If you wish to contact any individual or obtain contact information please don't hesitate to ask.

Thank you for your time.

Regards,

Kristin Spaetzel

BScH. Marine and Freshwater Biology

To Whom It May Concern:

I wish to add my support to the proposal made to relocate certain sea farms. I believe it will be beneficial to the fish being raised, the surrounding environment, the local community, and the economy.

Regards,

Casey Wells


Subject	Submissions RE: salmon farm relocation
From	Kristin Spaetzel
To	aquaculture submissions
Sent	Tuesday, 28 February 2017 4:20 p.m.
Attachments	<<C.Wells.pdf>> <<D.Ray.pdf>> <<K.Boaz.pdf>> <<K.Duff.pdf>> <<K.Spaetzel.pdf>> <<M.Leary.pdf>> <<M.Wells.pdf>> <<N.Wells.pdf>> <<S.Guy.pdf>> <<S.Wells.pdf>>

Hi,

I am writing as I have collated a number of submissions from people I know and their friends and family. Each letter is the same, however each individual has signed and dated their own copy to show their support for the idea. I felt this was the easiest way to register the support of a large number of people who are in favor of the idea of moving the sea farms but who would be unlikely to take the time to compose their own personal letter. Hopefully this will even things out as I realize people in favor are less likely to put in a submission than those who are against. Each individual has read and stated that they agree fully with the written statement. If you wish to contact any individual or obtain contact information please don't hesitate to ask.

Thank you for your time.

Regards,

Kristin Spaetzel

BScH. Marine and Freshwater Biology

Written Comment No: 0136-2017

To Whom It May Concern:

I wish to add my support to the proposal made to relocate certain sea farms. I believe it will be beneficial to the fish being raised, the surrounding environment, the local community, and the economy.

Regards, MIKE WELLS
mwells

Subject	Submissions RE: salmon farm relocation
From	Kristin Spaetzel
To	aquaculture submissions
Sent	Tuesday, 28 February 2017 4:20 p.m.
Attachments	<<C.Wells.pdf>> <<D.Ray.pdf>> <<K.Boaz.pdf>> <<K.Duff.pdf>> <<K.Spaetzel.pdf>> <<M.Leary.pdf>> <<M.Wells.pdf>> <<N.Wells.pdf>> <<S.Guy.pdf>> <<S.Wells.pdf>>

Hi,

I am writing as I have collated a number of submissions from people I know and their friends and family. Each letter is the same, however each individual has signed and dated their own copy to show their support for the idea. I felt this was the easiest way to register the support of a large number of people who are in favor of the idea of moving the sea farms but who would be unlikely to take the time to compose their own personal letter. Hopefully this will even things out as I realize people in favor are less likely to put in a submission than those who are against. Each individual has read and stated that they agree fully with the written statement. If you wish to contact any individual or obtain contact information please don't hesitate to ask.

Thank you for your time.

Regards,

Kristin Spaetzel

BScH. Marine and Freshwater Biology

Written Comment No: 0137 28-2-2017

To Whom It May Concern:

I wish to add my support to the proposal made to relocate certain sea farms. I believe it will be beneficial to the fish being raised, the surrounding environment, the local community, and the economy.

Regards,

Natasha Wells



Subject	Submissions RE: salmon farm relocation
From	Kristin Spaetzel
To	aquaculture submissions
Sent	Tuesday, 28 February 2017 4:20 p.m.
Attachments	<<C.Wells.pdf>> <<D.Ray.pdf>> <<K.Boaz.pdf>> <<K.Duff.pdf>> <<K.Spaetzel.pdf>> <<M.Leary.pdf>> <<M.Wells.pdf>> <<N.Wells.pdf>> <<S.Guy.pdf>> <<S.Wells.pdf>>

Hi,

I am writing as I have collated a number of submissions from people I know and their friends and family. Each letter is the same, however each individual has signed and dated their own copy to show their support for the idea. I felt this was the easiest way to register the support of a large number of people who are in favor of the idea of moving the sea farms but who would be unlikely to take the time to compose their own personal letter. Hopefully this will even things out as I realize people in favor are less likely to put in a submission than those who are against. Each individual has read and stated that they agree fully with the written statement. If you wish to contact any individual or obtain contact information please don't hesitate to ask.

Thank you for your time.

Regards,

Kristin Spaetzel

BSch. Marine and Freshwater Biology

Written Comment No. 0138

To Whom It May Concern:

I wish to add my support to the proposal made to relocate certain sea farms. I believe it will be beneficial to the fish being raised, the surrounding environment, the local community, and the economy.

Regards,

Shorleen Wells

Shel Wells

The Potential Relocation of Salmon Farms in the Marlborough
Sounds

Jarnnah Welsh

[REDACTED]

[REDACTED]

I am a solo parent and I rely on my job to provide my daughter with the necessities of life. Without my job at New Zealand King Salmon I would find it very hard to provide her with these things. It is not that easy to find a job with hours that allow me to earn and be home for my daughter after school.

Of course the environment factors are important also. I want to leave my daughter and grandchildren with a healthy environment in which to enjoy.

We need these 6 new farms to grow healthy good quality salmon and keep me employed.

Signed Jarnnah Welsh

J Welsh

14.2.17

Written Comment No:0542

Subject	The Potential Relocation of Salmon Farms in the Marlborough Sounds: Submission by B J Whillans
From	Errol & Jan Kelly
To	aquaculture submissions
Sent	Monday, 27 March 2017 3:56 p.m.
Attachments	<<The Potential Relocation of Salmon Farms in the Marlborough Sounds B JW.doc>>

Dear Sirs,

Attached is a submission on the **The Potential Relocation of Salmon Farms in the Marlborough Sounds.**

Yours sincerely

B J and I R Whillans

return email: 

The Potential Relocation of Salmon Farms in the Marlborough Sounds

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

Submission on the Potential relocation of Salmon Farms in the Marlborough Sounds

by

Barbara Joan and Ian Robert Whillans

R D 2 Kaiapoi 7692

I am opposed to the proposed placing of a salmon farm at Tio Point in Tory Channel, at the mouth of Oyster Bay by New Zealand King Salmon Ltd.

My comments are in relation to a family property in Oyster Bay, and in relation to the RMA. We are recreational users of this property.

1. We regularly stay at the property in Oyster Bay that belongs to J. Whillans, D. Munro, and D. and V. Griffiths.
2. We particularly love this bay because it is isolated, quiet, and has clean, clear water in the bay. It is safe to swim in, and particularly suited to use by children.
3. At night it is dark, with spectacular views of the stars on clear nights: somewhat spoilt by the glow of the lights of the Clay Point Salmon Farm, and the twinkling lights that mark the navigational markers on that salmon farm. The propposed salmon farm will only add to this light pollution.
4. There are many fish to be found in the bay, and significantly, it is a spawning ground for marine species. In particular we have seen young Piper fish, Kawawai, wrasse, seahorses, tarakihi, sharks, stingrays, gurnard and blue cod.
5. Other marine species that breed in the bay include paua, crayfish, cockles, oysters, pipi and mussels.
6. Many native birds also live in this area, including numerous seabirds, and native forest birds such as woodpigeons, weka, tuis, bellbirds, yellow fronted tomtits to name a few.

Written Comment No:0542

7. While previous owners of this bay have planted many *Pinus radiata* trees, the current owners, with our help, are actively poisoning these trees, with help and advice from DOC. Under the canopy of pinus, there is a carpet of native seedlings, waiting to grow. We are all very excited at the prospect of returning the land to its natural state. We have found Matai seedlings, for example.

RMA

In terms of the RMA section 6, I believe the following will be impacted.

8. The natural character of the coastal environment will be irrevocably changed by having a salmon farm at the mouth of the bay. This is a beautiful, quiet bay, with clean water, extensive fish life and is perfect for swimming and water sports.

Putting an industrial enterprise, a salmon farm, right in the centre of the mouth of the bay will inevitably change not only the appearance of the bay, but will limit access to it. It will undoubtedly affect water quality, and will alter the established and much valued biodiversity. With so much emphasis in our society at present on saving what we have in terms of natural diversity, it seems to be criminal to negatively affect an existing and balanced marine environment.

In terms of RMA section 7,

- 9 The amenity values of this bay will be irrevocably changed, in particular for our family and friends, but also for the many others who live in or use this bay for recreational purposes.

As mentioned in 8, the existing ecosystems will be altered by the presence of a salmon farm at the mouth of the bay. We object to the side effect on the marine environment of an industrial enterprise in the mouth of this bay. For example, we are specifically concerned with the effects of noise, lights at night, pollution from fish feed, fish excrement, service vehicle movements on the water, and general pollution – plastics, cigarette butts and other detritus, that will inevitably result from an enterprise such as this.

- 10 The sea currents in this area are such that considerable material both natural and manmade wash up onto the beach fronting this family property, and this will only become worse if the salmon farm is allowed to go ahead in its current proposed location.
- 11 The negative effect on the quality of the environment is as described in the paragraphs 2 - 10 .
- 12 The finite characteristics of natural and physical resources in Oyster Bay will be negatively affected by this proposal, and I object to this potential and seemingly inevitable change.

This is a very special area to us with a balanced and diverse ecosystem. We value it highly, and oppose the situating of a salmon farm at the mouth of the bay.

I do not wish to present this submission in person.

Yours sincerely

Joan and Ian Whillans

27 March 2017

Written Comment No:0590

Subject	Submission re the potential relocation of Salmon Farms, in the Marlborough Sounds
From	Jan Whillans
To	aquaculture submissions
Cc	
Sent	Monday, 27 March 2017 2:50 p.m.
Attachments	<<SUBMISSION RE Marlborough Salmon Relocation - 27March2017.pdf>> <<SUBMISSION RE Marlborough Salmon Relocation -27March2017.docx>>

To whom it may concern,

Please find attached our comments on the proposal.

Regards
Jan Whillans
Sent from [Outlook](#)

Written Comment No:0590

Submission on application concerning 360A and 360B of the Resource Management Act that is subject to public notification by the Minister of Aquaculture

To: Marlborough Salmon Farm Relocation Advisory Panel

Name: Jan Whillans and Duncan Patterson

This is a submission on the whether the Minister for Primary Industries (exercising aquaculture responsibilities), should recommend regulations to amend the Marlborough Sounds Resource Management Plan to provide for the relocation of up to six existing lower flow salmon farm sites to areas of higher flow.

The specific part of the application that our submission relates to is the **relocation site at Tio Point in Tory Channel**.

We are equal share-holders with two friends, in a 23Ha property in the eastern most corner of Oyster Bay, Tory Channel. We purchased the property almost three years ago (April 2014), as a way to be able to spend more time in the Marlborough Sounds. The Sounds have been a favourite playground for each of us, for both holidays and weekends away since high school and particularly once we both permanently moved to Marlborough 17 years ago. We both enjoy fishing, diving, free-diving and spearfishing, plus walking/tramping and hunting which was one of the key reasons behind being able to purchase a property in the Sounds.

The property was in a poor state when we bought it, so we have put in a huge number of hours to improve it; clearing fallen trees, cleaning the beach, repairing buildings, removing rubbish, fixing slips etc. A key part of our project work has been to look after the land and return the site to native bush; to this end we have trapped possums, controlled goats, sprayed gorse and poisoned over 800 wilding pines to date.

In between the work, we have enjoyed the property as a base for continuing our recreational enjoyment of the Marlborough Sounds, and sharing it with our families and friends, and their families. The property enjoys a beautiful wide and sandy beach which was one of the key attractions when we bought it, so when we are there we spend the majority of our time on the beach. We use the beach for a range of activities; swimming, waterskiing/ sea-biscuiting, paddle-boarding, snorkelling and generally playing on the water. Small children can paddle and swim safely due to the shallow nature of the bay, and clean clear water.

The dwelling on our property is not visible from the water, only the moorings and wharf give any indication of there being a residential property. The prevailing North West wind blows directly onto our place, so the buildings are protected by trees to shelter the property. We have plans to build a residence on the property in years to come, and have always envisaged this building would take advantage of the water views and north west aspect towards the sun.

We have a number of concerns about the establishment of a new Salmon Farm within Oyster Bay, and how this will impact on the wider community of Oyster Bay, the water quality and our enjoyment of this area.

1. Effect on Visual Amenity

- i. We believe the location of the proposed Salmon farm will heavily affect the visual aspect from our site. The amenity value of our property is strongly influenced by the wider bay we look out to, and intrinsically linked to the identity of the site. We spend the majority of our recreational time down at the beach, and the proposed site of the Salmon farm will become a significant feature in our current view. We believe it will detract from this view shaft and become a focal point, especially due the location between two headlands.

Written Comment No:0590

- ii. We believe our property is likely to be the most negatively affected by the visual impact of the proposed farm, as it will sit in the middle of our predominant view. The location and orientation of our beach means it is not possible to screen the proposed farm out of this view shaft.
- iii. The proposed site of the Tio Point farm, is to be located in the centre of the Oyster Bay entrance, and therefore does not have any surrounding land mass for the farm to recede against. The landform behind the existing Clay Point farm allows it to be better absorbed into the landscape than the current proposal for Tio Point. We can see the existing Clay Point site from our beach, but the way this farm sits nestled within the bay against the landform, means the farm is visually anchored by the land features that sit behind it and the visual impact is reduced.
- iv. The Hudson Associates Landscape report does not appear to consider the visual effect from our property, and especially that our predominant view will include both the proposed Tio Point Farm, and the existing Clay Point farm. Both sites will be visible in the same view shaft.
- v. The landscape photos supplied as part of the consultation, illustrating simulations for particular viewpoints for each of the sites, were noticeable for being taken from the vantage point where the proposed farm site was backed against the nearest landform, which gives the appearance of the farm receding into the view more.
- vi. These landscape photo simulations provided as part of the consultation process, also do not show the most common view for recreational users coming from Picton going northeast down Tory Channel, or for property owners approaching Oyster bay. The proposed site will significantly change the view for anyone entering Oyster Bay. The clear water view through to our beach as we round Tio Point to enter our holds an intrinsic value which we are concerned will be lost if the proposal goes ahead as recommended. The entry to the Bay is currently uncluttered by structures and/or obvious human influence. The proposed farm location would diminish this 'naturalness' and change the perception of the bay as being commercial in nature.
- vii. There is currently an approved resource consent for a marine farm, located adjacent to the proposed Tio Point farm site (Marlborough District Council Marine Farm # 8409, as per application MPE469). It is not currently operating as a Marine Farm, but is marked out with marker buoys, and has consent to operate as a Marine farm until the current consent lapses in March 2020. Should the owner of this site choose to rightfully place a marine farm in this area it will have a further detracting effect on the visual amenity of this area. This cumulative effect of both the Salmon and mussel farm does not appear to have been considered by the Hudson Associates landscape report.

>> We oppose the application as we do not think that the visual effects can be adequately mitigated. However should the advisory panel be minded to approve the application we would like the feed barge to be in recessive colours, be single story, and be located in a position to minimise visual effect from our property.

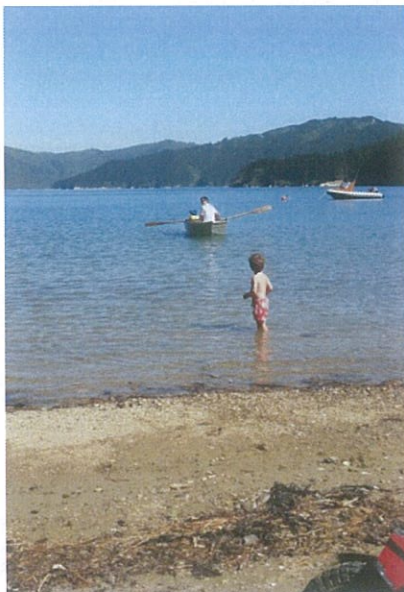


Fig. 1 example of a typical family photo showing the primary view shaft from the beach of our property. The new proposed Salmon farm site would be in the centre of the water-horizon point.

Written Comment No:0590

2. Effect on recreational enjoyment of the area

- i. We enjoy paddle-boarding, water-skiing and biscuiting around Oyster Bay throughout the summer, and will often go out, over and around the proposed farm site. The proposed location will affect the available space for us and the other families in the Bay, who also regularly share the same activities in this space.
- ii. We enjoy a wide range of marine life within the Bay, this is a great source of our enjoyment of the area and also education for the children and visitors. We have a number of Paua sites, (which we do not collect from in order to protect and let them proliferate) crayfish, and beds of cockles and pipis. It is also very common to see stingrays, schools of kawhai, garfish, and krill, and from time to time a pod of dolphins. We have also seen blue cod, gurnard, kawhai, spotties, and terakihi within the Bay. On the beach we have two resident oyster catchers and the children enjoy finding crabs and native eels where the creek meets the beach. The rocky shorelines around the edge of the Bay are particularly rich marine communities and are a pleasure to snorkel through. We are concerned that any effects from a commercial activity may upset this ecological diversity and eco-system and therefore our enjoyment of it.
- iii. The reef at Tio Point is a popular dive site for us and a number of others. There is a high number of boats that anchor at this site for recreational diving. We are afraid that the close proximity of the salmon farm would affect this reef and the marine life we enjoy on this site.
- iv. Oyster Bay, particularly around the entrance is very popular with recreational boaties. During the summer in particular, there is always at least one boat, and often two, positioned somewhere along Tio Point, Motukina Point, and the shoreline back into Oyster Bay.
- v. We are concerned that the addition of a new Salmon farm into Oyster Bay will change the nature of the bay to that of a commercial site. While there are a number of marine farms in the bay already, these are all mussel and oyster farms and have a low profile in the water and do not have a high frequency of human activity.
- vi. Two previous Marine Farm applications for Oyster Bay have been turned down (Application U990846 and U990714) . The key reasons these applications were refused were;
 1. *The Committee considered that the location of the proposed farm immediately to the north of an existing residential property at the head of the bay, with associated jetty and mooring, would have an undue adverse effect on that property.*
 2. *The Committee noted that the marine farm structures would be visible to a degree from the property, and would constitute a visual intrusion in terms of the introduction of structures into what is currently an unoccupied water space.*
 3. *The Committee accepted the evidence presented by a variety of submitters that Oyster Bay is receiving an increasing level of recreational use, particularly in terms of fishing and diving and the beaches and cockle beds at the head of the bay are a logical focus for that activity.*
 4. *The Committee considered that the establishment of a marine farm in this area would adversely affect those activities.*
- vii. We are also concerned that the cumulative effects of additional farms in a small area, will mean that the farms dominate the character of the area and give it a new utilitarian focus. Tory Channel is the gateway for thousands of tourists to the Marlborough Sounds, and the greater Marlborough region, and the intensity of marine farms is not in line with perceptions of this region.

3. Navigation

- i. Another of our principle concerns is navigation safety, given that farm is proposed to be sited in the centre of the entrance to Oyster Bay, between Tio Point and Motukina Point. This will leave a much reduced access space on either side for safe travel past the Salmon farm. It will also increase our travel time as in accordance with the Harbourmaster, all boats need to reduce speed to 5kn with 200m of shore or a structure.
- ii. A second concern is that should the owner of the consented marine farm (Marlborough District Council Marine Farm # 8409, as per application MPE469), adjacent to the proposed Salmon farm,

Written Comment No:0590

rightfully decide to put their farm in place, it will significantly reduce the access to Oyster Bay from Tory Channel. We estimate it would leave an entrance of approximately 200m on the northern Motukina Point side, and only a very narrow entrance on the Tio Point side of perhaps 50m. This site is not currently operating as a Marine Farm, but is marked out with marker buoys, and has consent to operate as a Marine farm until the current consent lapses in March 2020.

- iii. In addition to the proposed water area of the farm, there will regularly be vessels such as feed and supply barges, harvesting boats, and other vessels moored alongside the farm, which will further restrict the available water space when navigating past the farm.
- iv. Narrow access will be a particular concern for large boats wanting to access the Bay, for example our neighbours and other recreational users of the Bay. Last summer we had a medium-large luxury vessel anchor in the bay for three days, they would be likely to re-consider this anchorage in the future.
- v. We have a number of friends and family who visit us in a range of vessels, the reduced access will also affect these regular visitors.

4. Cumulative effect of multiple aquaculture sites

- i. We are concerned about the cumulative effects of multiple aquaculture sites within a relatively small area within Tory Channel. Should the Proposal go ahead there will be four Salmon farms operating within a ~1800m radius, and three Salmon farms operating in a ~650m radius. In addition to this, there are four operating marine farms in Oyster Bay, plus approved consents for a further two which could start operating at any time.
- ii. It should be noted that not all the consented or operating mussel farms in Oyster Bay were noted on the Consultation proposal documents. Of the four operating farms in the bay, only one was indicated, additionally only one of the two consented but not operational farms were shown. Given the easy access of the Marlborough District Council's marine farming map on their website, it is very disappointing that this was missed on the documents. It is reasonable to expect that the presence and density of other farming operations in the area is an important consideration to this submission process, and given the level of detail provided in the many documents it is remarkable to think these farm sites were somehow omitted from even the MPI 'Summary Consultation Document'.



Written Comment No:0590

Fig. 2 Image provided from the MPI Summary Consultation Document. Dotted area denotes existing marine farms.

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



Fig. 3 Image sourced from the Marlborough District Council website, map of Marine Farm consents. Blue areas are approved consents. Yellow areas are declined consents. Sites marked with a red 'x' are consented, but not operational.

<https://maps.marlborough.govt.nz/smaps/?map=6af1f32120314f569f780dafba2647cf>

5. Rubbish

- i. The location of the beach within the shoreline of our property means the prevailing North West wind pushes all rubbish, seaweed, pine needles, marine farm debris etc. onto our beach. Our bay is known locally as a natural collection point for surface debris. We clean the beach every week we are there. Of the plastic rubbish we collect often the majority is from commercial aquaculture and fishery activities; e.g. blue and white strapping tape, a wide range of ropes, mussel buoys, circular filter guards and other unidentifiable, but regularly occurring material. Please see photo attached for an example.

We are concerned that the addition of another commercial venture will only increase the amount of commercial rubbish we need to deal with and remove from our property. From our experience,

Written Comment No:0590

we would expect that there is a very high probability that anything that comes off the proposed Tio Point site, will end up on our beach.

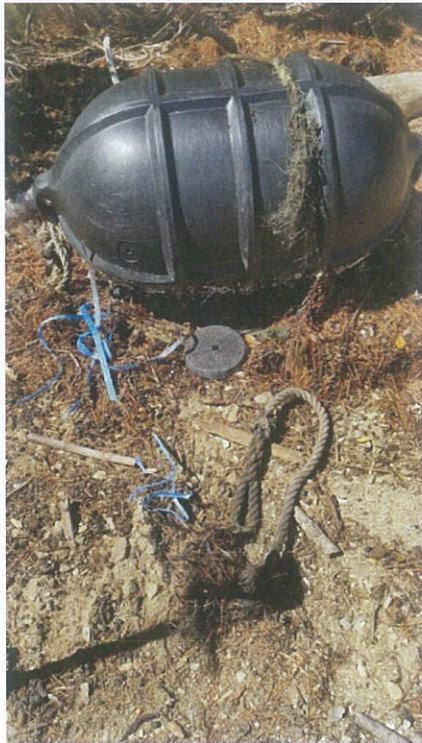


Fig. 3



Fig. 4



Fig. 5

Fig. 3 Photo illustrating some of the commercial grade rubbish collected at our beach.

Fig. 4 Image showing some of the typical rope and strapping tape regularly collected.

Fig. 5 Photo showing the collection of small bits of rubbish collected in a single clean up, all from the main beach on our property.

Written Comment No:0590

6. Water quality and sedimentation

- i. We are concerned about the effect of both waste and excess nutrients from the Salmon farm accumulating within the bay. The Hydrodynamic modelling suggests that this will be swept out of the bay and down Tory Channel, however Oyster Bay is a relatively large and shallow bay as can be seen on the Navigational maps. There is notable sediment build up at the eastern and southern end of the bay where mud can be seen in the low tide zones.
We are concerned that any waste particles in the water column which are not flushed down the Channel will follow the same path as other debris to the shallow ends of the Bay, where it will deposit and create further sedimentation, affecting the Cockle and Pipi beds and affecting the current seafloor quality.
- ii. There does not appear to have been any water testing to understand the effect of intensive Salmon farming on the inshore water quality in shallow bays such as Oyster Bay, and how any benthos or resulting particulate accumulations in the inshore water column will affect the water quality.
- iii. We have concerns that greater nutrient levels in the water arising from the salmon farming activity will lead to increased growth of sea lettuce, and other algae life, in the low tide zone and also impact on the quality of the current water quality.

>> We would like to see water quality testing on the interior of Oyster Bay (ideally more than one site), to ensure that the addition of a new Salmon farm site does not have any adverse effect on the water quality we currently enjoy in Oyster Bay.

>> Should there be any adverse change in the water quality and the marine environment, we would like to be assured that there will direct action taken to ensure a return to the quality of water and marine environment.

7. Change of the Hydro-dynamics of Oyster Bay

We have a concern that the placement of a large structure in the centre of the bay entrance will adversely affect the currents and water movements within the bay. This effect could be further heightened by the addition of a mussel farm being placed in the adjacent site.

8. Introduction of species and or disease

- i. We are also concerned about the additional introduction of species such as seals and predatory fish such as sharks and orcas. Over the time we have spent recreationally within Tory Channel, both before and since owning our property here, we have noticed an increase in the number of seals around this area. It is well known that the seals are attracted to the Salmon farms, but it is noticeable to now always see seals located on Tio Point. Baby seals have been born at this site, and it can only be expected for the numbers to continue to grow at this site as the food becomes available, and it continues to become 'home' to the next generations. Our concern is this expansion of the population will start to expand to make other sites home, including one of the beaches near where we are recreationally enjoying the water.
- ii. The increased presence of seals also effects the enjoyment of our recreational activities such as swimming and diving, and increases competition for catching fish.
- iii. We are also concerned that there will be an increase in sharks, alongside the increase in salmon farms. Again any increased presence will affect our activity and recreational enjoyment of the area.

Written Comment No:0590

9. Noise

On still nights, and when there is a light northwest breeze blowing, we currently hear the hum of generator on the Clay Point Salmon farm. (There is no other installation or equipment within Oyster Bay which could provide this noise).

Our concern is that with the placement of a second farm, the noise level will only increase. Oyster Bay is a reasonably remote and unpopulated area, so hearing industrial noise does not fit with the character of the location.

10. Lights

As with Point 9 above, we can currently see the underwater lights of the Clay Point Salmon farm from our beach. This light interference will only be heightened with the addition of a second farm in the foreground.

As with noise, the distinct light spill of the farm lights does not fit with the character of the remote and natural location of Oyster Bay.

11. In summary:

This process has been at very short notice, and with a huge amount of information to read and understand. It has been difficult to understand why there was the urgency for the consultation period to be so short. It does feel like this urgency is in King Salmon's favour as we all work full time and have had to rely on the information being accurate, rather than be able to do our own research. It is a lot of information and difficult for lay-people to understand the often technical details.

We are also concerned that this process overrides the Marlborough District Council and community's standard process and the legal plan for the Marlborough Sounds. It bypasses the normal RMA (Resource Management Act) process and appears to ignore much of the legal Supreme Court decision in EDS v King Salmon. It also appears to compromise the value of Coastal Marine Zone 1.

As outlined above we have some key concerns about the proposal, and at this stage we oppose the proposal. We would like the opportunity to discuss this at the Panel Hearing.

Name: Jan Whillans and Duncan Patterson, part owners Oyster Bay property

Contact: [REDACTED]

Panel Hearings: We would like to attend and speak

We seek the following decision from the consent authority:

At this stage we **oppose the proposal**. We would like the opportunity to discuss this at the Panel Hearing, we therefore **wish to be heard**.

Signed: Jan Whillans and Duncan Patterson

27 March 2017

Address for service of submitter: [REDACTED]

Written Comment No:0590

Telephone:

Email:

Contact person:

Jan Whillans



Fig. 6 Image showing the primary view from our beach, including both headlands to Oyster Bay.

Written Comments No: 0245

Salmon Farm Relocation

Ministry for Primary Industries

Private Bag 14

Port Nelson

16/03/2017

aquaculture.submissions@mpi.govt.nz

To: The Salmon Relocation Advisory Panel

I am in support of the relocation of various salmon farms in the inner Marlborough sounds to sites with higher flows in the outer sounds.

I support the submissions to relocate for economical, recreational and technological reason.

Moving the farms to sites with higher flows will create a better environment for the salmon to grow creating a healthier more valuable product. The infrastructure will also need improving creating jobs for local or international manufacturers.

Moving the farms to the outer sounds will give recreational users of the inner sounds a greater area to use and enjoy.

The move to sites with greater flows will bring technology and infrastructure which has previously not been needed in New Zealand waters, I believe this is a step towards open ocean sea farms, which could be a possibility in the future.

Thanks

Simon Whitford



Written Comment No: 0168

Subject	Salmon farms
From	[REDACTED]
To	aquaculture submissions
Sent	Thursday, 9 March 2017 3:32 p.m.

We would like to support King Salmon in the ability to move some farms to better sites for farming. Our understanding of Salmon farming leads us to believe it is the best thing for not only the company but also for the fish. Good water flow greatly improves the fish living conditions as is seen by better growth and survival of the fish. We have worked closely with King Salmon in setting up and maintaining our salmon reticulation lab for student studies and believe the company to be progressive and supportive of the welfare of their fish and the environment. We also look forward to the industry increasing and giving the community more opportunities for work.

--

Nga mihi

Betty Whyte

- Principal
- Director of Aquaculture

Queen Charlotte College

[REDACTED]

[REDACTED]

Picton

Phone [REDACTED]

Subject	QCC submission
From	betty whyte
To	aquaculture submissions
Sent	Friday, 10 March 2017 10:29 a.m.
Attachments	<<Supplier Salmon Farm Relocation template submission (1).docx>>

--

Nga mihi

Betty Whyte

- Principal
- Director of Aquaculture

Queen Charlotte College

 Road

Picton

Phone 

Salmon Farm Relocation

Ministry for Primary Industries

Private Bag 14

Port Nelson

aquaculture.submissions@mpi.govt.nz

I had previously e-mailed a submission but am not sure if it needs to be in this format if so I have completed this as well.

To: The Salmon Relocation Advisory Panel

Introduction – who you are / where you work / and your role

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

I understand that by relocating farms from lower water flow sites to higher water flows sites fish performance will improve and therefore the health of the salmon. It will also have a lower level of effect on the seabed which will have positive environmental benefits.

Environmentally, adopting the Best Management Practice guidelines that were agreed by the Council and community is the future for aquaculture globally.

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

Moving some farms away from baches to more remote locations will improve social amenities which is also a good thing especially from a navigation viewpoint.

What will this mean for you as a partner of King Salmon?

We are very grateful for the continued support King Salmon gives our Aquaculture academy. They supply fish, knowledge and other resources to the school to help educate our students about aquaculture. Their success is therefore of benefit to our students both directly and also as possible future employment. We also value the research that goes into establishing the best environmental practises for producing salmon.

How will this affect your company?

As mentioned above the success of King salmon increases the likelihood of further support they are able to offer the school. It also strengthens the community and supports roll growth to the school.

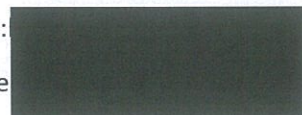
I **would not** like to be heard by the hearings panel.

Name: Betty Whyte Principal Queen Charlotte College

Email:

Date: 10 March 2017

Phone



Written Comment No: 0180

Subject	salmon farm expansion submission
From	Hanneke & Joop
To	aquaculture submissions; stephen wilkinson
Sent	Friday, 10 March 2017 1:06 p.m.
Attachments	<<Wilkinson.pdf>>

see attachment.

Written Comment No: 0180

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

Email to:
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	<i>Richard Wilkinsons</i>
Address	<i>[Redacted] Pelorus Sound</i>
Email	<i>[Redacted]</i>
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 type="checkbox"/>	I would like to speak to my written submission at a public hearing in _____
<input checked="" type="checkbox"/>	I do not want to speak to my written submission at a public hearing

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

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

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

- The Marlborough Sounds biodiversity is NOT in good shape.
- The issues include: fewer fish, not as many species, serious loss of biogenic habitats, sedimentation in estuaries and biosecurity incursions.

The Marlborough Sounds needs proposals for protection and restoration of its natural environment and marine ecosystem, **NOT** proposals for further exploitation and degradation such as this one. It is submitted that the aim of this MPI proposal, thinly disguised as salmon-farming relocation, is in fact a proposal for the massive expansion of salmon farming in the Waitata Reach area of the Pelorus Sound.

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

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

The Board of Inquiry drew the limits

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

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

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: *Monahou Sound should be a marine park NOT a salmon farm.*

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

Written Comment No: 0427

Subject	Scan Data from FX-B62434
From	DocuCentre-IV C3373 Selina Wilkinson
To	aquaculture submissions; tahuna@tahunabeach.co.nz
Sent	Saturday, 25 March 2017 12:37 p.m.
Attachments	<<25032017123706-0001.pdf>>

Number of Images: 3

Attachment File Type: PDF

Device Name: DocuCentre-IV C3373

Device Location:

Written Comment No: 0427

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		SELINA GWENDOLINE WILKINSON	
Address		OKIWI BAY,	
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 type="checkbox"/>	I would like to speak to my written submission at a public hearing in _____		
<input type="checkbox"/>	I do not want to speak to my written submission at a public hearing		

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

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

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

- The Marlborough Sounds biodiversity is NOT in good shape.
- The issues include: fewer fish, not as many species, serious loss of biogenic habitats, sedimentation in estuaries and biosecurity incursions.

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

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

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

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

The Board of Inquiry drew the limits

In 2012 NZKS applied for nine new salmon farms in areas prohibited for salmon farming via a Board of Inquiry process. They were ultimately allowed three farms. The Board of Inquiry, and then the

Written Comment No: 0427

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.

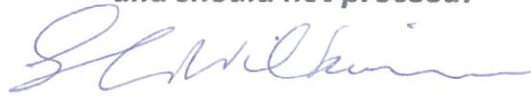
Other Comments: Since 2015 the condition of the water seabed and surrounding environment in the Marlborough Sounds has gone from bad to worse mainly from the pressure on Councils and the governing bodies from greedy commercial exploiters. After extracting the maximum profit for their owners they will move on to other unspoilt areas and repeat the exercise. This is why I am asking the Government to act in the best interests of Allh New Zealanders and decline this proposal in its entirety.

Sarah Williams

Conclusion: this proposal is fundamentally flawed, environmentally unsustainable

Written Comment No: 0427

and should not proceed!

A handwritten signature in blue ink, appearing to read 'J. L. Milne', is written over the printed text 'and should not proceed!'.

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

Email before 5pm, Monday 27 March 2017

to:

aquaculture.submissions@mpi.govt.nz