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

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Written Comment No: 0384

Subject	Fwd: MPI potential relocation of salmon farms
From	Karen Mant
To	aquaculture submissions
Sent	Friday, 24 March 2017 1:41 PM
Attachments	<<Submission_AnneMacColl_Scotland.docx>>

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

From: **Anne MacColl** <[REDACTED]>

Date: 23 March 2017 at 22:32

Subject: MPI potential relocation of salmon farms

To: [REDACTED]

Dear Karen

As per my last email, here is my support for the MPI potential relocation of salmon farms . I wish you all the best with this proposal.

With best regards

Anne

[REDACTED]

--

Karen Mant, *Environmental Project Manager*



New Zealand King Salmon



M: +[REDACTED] W: www.kingsalmon.co.nz | A: 93 Beatty Street, Tahunanui, 7011



Written Comment No: 0384

ORA KING™

Written Comment No: 0384

Salmon Farm Relocation

Ministry for Primary Industries

Private Bag 14

Port Nelson

aquaculture.submissions@mpi.govt.nz

To: The Salmon Relocation Advisory Panel

I am former Chair of the Scottish Salmon Producers Organisation (SSPO) which represents the interests of the Scottish salmon industry and the value of salmon and aquaculture to the Scottish economy.

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.

As a strong supporter of environmentally sustainable salmon farming globally, I have seen first hand during my time in New Zealand during September 2016 the value of King Salmon in New Zealand to the New Zealand economy, and the care and attention that NZKing salmon takes to balance the social, environmental and economic agendas. We worked together and exchanged ideas on Community engagement with the industry, which is a key part of the success story of the Scottish salmon industry.

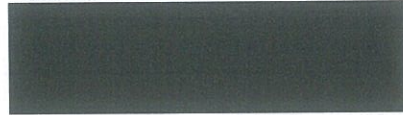
As Scotland embarks upon a strong aquaculture development strategy for 2030, as part of our wider food and drink 2030 vision, I see many parallels between the sustainable Scottish approach and philosophy of farming salmon to that of New Zealand King Salmon. In Scotland we have farmed salmon for 50 years and the industry is a cornerstone of our economy, delivering 8,000+ jobs, over £500m exports, and creating thriving economies in the most fragile rural locations of our country. With a likeminded approach and philosophy to farming that I witnessed in NZ with NZ King Salmon, I am convinced that the relocation process proposed by MPI will serve positively for the future of the industry and the overall NZ economy.

Written Comment No: 0384

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

Name: Anne MacColl

Date: 23.03.17



Written Comments No: 0209

Subject	Salmon Farm Relocation
From	[REDACTED]
To	aquaculture submissions
Sent	Wednesday, 15 March 2017 8:59 a.m.

To: The Salmon Relocation Advisory Panel

To whom it may concern,

I have spent a large amount of time in the Marlborough sounds and see growing the economic capability of the region, in an environmentally sustainable way, as important to its development. This growth is important for the community, providing jobs and amenities where required.

I feel strongly about the need to develop the region through environmentally sustainable methods and this comes from my family's close association with the area. My ancestors were early settlers in Tennyson inlet, indeed Godsiff bay is named after them. My grandmother grew up in Manaroa and my parents now live in Moetapu bay.

I believe that the people and organisations that work in the Marlborough sounds are passionate about the need to care of the environment and I see this passion in the people that work at New Zealand King Salmon.

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 reduce the effect on the seabed which will in turn will provide positive environmental benefits.

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

For the above reasons I support the salmon relocation process being proposed by MPI

Regards

Grant

Grant McKenzie | [REDACTED]
[REDACTED]
[REDACTED]



Written Comments No: 0209

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Please consider the environment before printing this email.

Written Comment No: 0183

Subject	SALMON FARM EXPANSIONS - MARLBOROUGH SOUNDS. SUBMISSION
From	[REDACTED]
To	aquaculture submissions
Sent	Sunday, 12 March 2017 1:24 p.m.
Attachments	<<NZKS proposal AM 11 March 2017 combined.doc>>

FAO: NATHAN GUY, ESQ MP MINISTER FOR PRIMARY INDUSTRY
MARLBOROUGH SALMON FARM RELOCATION ADVISORY PANEL

Please find attached a submission regarding the proposed salmon farm expansions in the Marlborough Sounds.

Thank you for the opportunity for us to make this submission.

Yours sincerely

Dr. Alastair MacKenzie PhD
Ms Nannette Brown

Sent from [Mail](#) for Windows 10

FAO:

Nathan Guy, Minister for Primary Industry (MPI)
Marlborough Salmon Farm Relocation Advisory Panel

SALMON FARM EXPANSIONS – MARLBOROUGH SOUNDS

We wish to make a submission against the whole Ministry for Primary Industries (MPI) proposal for “Potential Relocation of Salmon Farms in the Marlborough Sounds”

We do not want to speak to our written submission at a public hearing

We 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 notes the following:

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 need proposals for protection and restoration of its natural environment and marine ecosystem, NOT proposals for further commercial 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 seven (7) farms in Waitata Reach. It will mean two to three 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 the industrial scale as is now proposed by MPI and New Zealand King Salmon (NZKS).

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 only.

The Board of Inquiry, and then the Supreme Court, made a number of very important findings which this ‘new’ proposal is attempting to ignore.

It is submitted that this is a blatant attempt to try and achieve for NZKS what it failed to achieve previously. 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: 0183

Again, NZKS with the collusion of MPI 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 upon our iconic landscape.

This proposal, we submit, ignores the Board of Inquiry finding a threshold limit of two new farms in the Waitata Reach to which the Environment Court subsequently agreed.

In the last five years the existing NZKS operations have suffered from four unusual mortality events and pathogens new to NZ have been discovered in the dead salmon. As a result there is a Controlled Area Notice under the Biosecurity Act in place.

Accepted 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. Adverse environmental factors combined with poor management practices result in these regular and significant salmon mortality events.

Instead of allocating clean unspoiled water space for new farms and closing old poorly managed farms, real pressure should be put on NZKS to operate their existing farms in accordance with Best Management Practice Guidelines – something NZKS frequently refer to in their advertising material.

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, show these beneficial claims are greatly inflated.

Moreover, this narrow-minded approach 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.

For the sake of a few shekels – or in this case Malaysian Ringitt – NZKS, sadly with the collaboration of MPI, are being driven by the great God Mammon to the detriment of our beautiful environment, which is not a factory floor.

When Nathan Guy moves on and NZKS find some other country to pollute we, and our grandchildren, will be left with a toxic and damaged environment. We live here – they do not!

This proposal is fundamentally flawed, environmentally unsustainable and should NOT proceed!

Dr. Alastair MacKenzie PhD

[REDACTED] Picton 7282

E-mail: [REDACTED]

Tel: [REDACTED]

Nannette Brown

[REDACTED] Picton, 7282

E-mail: [REDACTED]

Tel: [REDACTED]

Written Comments No: 0441

Subject	AndreaMacklinSubmission.pdf
From	Andrea Macklin
To	aquaculture submissions
Sent	Sunday, 26 March 2017 10:17 a.m.
Attachments	<<AndreaMacklinSubmission.pdf>>

Thanks,
Andrea

Written Comments No: 0441

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 Comments No: 0441

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	ANDREA TRACEY MACKLIN		
Address	[REDACTED] RD 2 PICTON 7282		
Email	[REDACTED]		
Telephone (day)	[REDACTED]	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 [REDACTED]
<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.

Written Comments No: 0441

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!

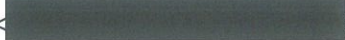
Written Comments No: 0453

Subject	Re: ThomasMacklinSubmission.pdf
From	Tom Macklin
To	aquaculture submissions
Sent	Sunday, 26 March 2017 11:12 a.m.
Attachments	<<ThomasMacklinSubmission.pdf>>

With attachment.

Thanks,

Tom

On 26/03/2017 11:09, "Tom Macklin" < > wrote:

Thank you,

Tom

Written Comments No: 0453

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 Comments No: 0453

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	THOMAS EDWARD MACKLIN		
Address	[REDACTED] PICTON		
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]
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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).

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

Written Comments No: 0453

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.

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The best Place for Salmon Farming?

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

Other Comments:

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

Written Comment No: 0370

Subject	Emailing - Potential-Relocation-of-Salmon-Farms_Matthew Maher.pdf
From	Matthew Maher
To	aquaculture.submissions@mpi.govt.nz
Sent	Monday, 27 March 2017 7:15 PM
Attachments	<<Potential-Relocation-of-Salmon-Farms_Matthew Maher.pdf>>

Dear Madam or Sir,

Apologies for the late submission, but please find attached my submission form.

Kind regards,

Matthew Maher

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 Comment No: 0370

Public hearings

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

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

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

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

Questions

Question 1:

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

Yes, aquaculture is clearly an industry in which New Zealand can excel on a world stage, achieving strong premiums to create wealth and jobs for New Zealanders. In addition, I believe the change would create superior environmental outcomes in the Sounds.

Question 2:

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

All sites

Question 3:

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

All sites

Question 4:

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

I do not have any concerns about particular sites

Written Comment No: 0370

Question 5:

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

I believe the benefits and costs have been well documented. I would stress that I consider the economic and environmental outcomes would be highly value accretive for New Zealanders.

Question 6:

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

No

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?

I agree

Question 8:

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

I agree, although note that in my opinion there is scope for an **increase** in the overall surface area of sea farms in the Marlborough Sounds.

Written Comment No: 0370

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?

Whilst other types of aquaculture may be suitable, the Ruakaka site should, in my opinion, be prohibited from aquaculture activities if vacated.

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?

Shellfish farming should be allowed to continue

Question 11:

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

Yes

Question 12:

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

No

Written Comment No: 0370

Question 13:

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

No

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?

The Crail Bay sites (in priority), followed by the Forsyth and Waihinu Bay sites.

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 Comment No: 0370

Question 17:

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

No

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?

No, I believe the impacts on landscape and natural character at the potential relocation sites are negligible.

Question 19:

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

I have no further thoughts to add.

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?

I believe these matters are appropriately addressed in the associated documentation.

Written Comment No: 0370

Question 21:

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

No

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?

I believe that this matter is appropriately addressed in the associated documentation.

Question 23:

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

I believe that this matter is appropriately addressed in the associated documentation.

Question 24:

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

I believe that this matter is appropriately addressed in the associated documentation.

Written Comment No: 0370

Question 25:

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

No

Question 26:

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

No

Question 27:

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

No

Question 28:

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

I believe that this matter is appropriately addressed in the associated documentation.

Written Comment No: 0370

Question 29:

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

No

Question 30:

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

I believe that this matter is appropriately addressed in the associated documentation.

Question 31:

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

Yes

Question 32:

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

I believe that the potential relocation sites offer opportunities for improvement in salmon health, welfare and husbandry

Written Comment No: 0370

Question 33:

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

I have no further comment to add

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?

I have no further comment to add

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?

I have no further comment to add

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?

I believe that this matter is appropriately addressed in the associated documentation.

Written Comment No: 0370

Question 37:

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

I have no further comment to add

Question 38:

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

I believe that this matter is appropriately addressed in the associated documentation.

Question 39:

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

I believe that this matter is appropriately addressed in the associated documentation.

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?

New Zealand alone, amongst all global salmon producers, is the only aquaculture region to successfully grow premium value King Salmon. I believe that the relocation would add considerable economic wealth and jobs for the region, including a high proportion of higher-skilled jobs.

Written Comment No: 0370

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

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

This image shows a single sheet of white paper with horizontal blue ruling lines. The lines are evenly spaced and run across the width of the page. There is no handwriting or other markings on the paper.

Subject	NZKS Submission
From	[REDACTED]
To	aquaculture submissions
Sent	Thursday, 9 March 2017 3:39 p.m.

Dear Advisory Panel

I am the current health, safety and Wellness Manager/Advisor for New Zealand King Salmon. I have two little ones Milan and Zeb and we are all based in Nelson. Both the kids love salmon and it makes up a staple part of there diet. For me as a parent the health benefits of salmon are important for their development and the fact that they love the taste and will eat it (being fussy kids) is a massive bonus.

I support the potential salmon farm relocation for a number of reasons:

1. The growth in salmon globally as a quality source of protein is important to help fight the issues people face with commodities and health related issues (Obesity being one). Salmon is a rich source of protein with other amazing health benefits that many other protein sources do not have.
2. The benefit to the Upper South Island and NZ as a while for not only,local jobs but also the flow on affect to support organisations like road transport, electrical, engineering an other suppliers of product or labour will all benefit from this growth.
3. The environmental benefits with higher flow waters enabling a more sustainable practice.

Kind Regards Dan

--

Dan Mahony, *Senior Advisor, Health, Safety and Wellness*



M: +[REDACTED] | W: www.kingsalmon.co.nz | A: 93 Beatty Street, Tahunanui, 7011



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Relocation of Salmon Farms in
the Marlborough Sounds.

Submission For Kung Mang
Hot smoke evening Shift.

I have worked at King Salmon
for nearly 4 years From 2013
working Night Shift + Evening
Shift.

I am happy  for working
King Salmon & For the
Fish Farm.

Kung Mang

Written Comment No: 0192

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
Address

Valerie Margaret Mann

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 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:

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

Written Comment No: 0193

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
Address

Ronald Thomas Mann

Email

Telephone (day)

Mobile

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