

Contents Page: N – Nelson Regional

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
65	Nang	Maung
212	Neilson	Hans
595	Nelson Regional Development Agency Ltd	

Relocating Salmon farms in the Marlborough Sounds.

Maung Nang



I think we need to move the farms to a faster current to keep the fish in a good environment to grow healthier. It will be good for the company with better quality fish to send around the world. It means more sales and more jobs for everyone. Workers will be happy because they will have job security. Better for environment and for our families to live with.


Maung Nang

21.02.2017

Written Comments: 0212

Subject	MPI Aquaculture Submission - Marlborough
From	[REDACTED]
To	aquaculture submissions
Sent	Wednesday, 15 March 2017 1:05 p.m.

Regarding the proposed Marlborough salmon farm relocation project. As an individual I would like to make a positive submission in regards to the important contribution that Aquaculture makes to the local economy, and the positive impact that this has on the economic wellbeing of this community.

Regards,

Hans Neilson

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



Written Comment No:0595

Subject	Accompanying note to Salmon Farm Submission from NRDA
From	Lesley McQue
To	aquaculture submissions
Sent	Thursday, 30 March 2017 10:32 a.m.
Attachments	<<Submission in Support of Salmon Farm Relocation 24th March 2017.pdf>>

Dear Laura

With regard to our telephone conversation a short while ago, I am emailing you to put in writing the explanation that I gave you as to our failed attempt to deliver the submission on Monday 27th March.

We thought that we had used this email address, dispatching the email at 8.15 am on Monday 27th March. Only today we discovered a bounce-back email indicating that the email was undeliverable, this being compounded by the fact that the bounce-back went into the spam folder. On examination it transpired that I had mis-spelled the email address as "aquculture" instead of "aquaculture".

I regret that we made the initial error, and also that it has taken us several days to discover it. As you are aware I have recently re-sent the submission to the correct email address, and have received a confirmation email back.

I had hoped to provide to you a copy of the bounce email but unfortunately I am rather thorough about clearing out my inbox and wastebasket on a daily basis, and I no longer have the email.

Thank you for your assistance in this matter.

Kind regards

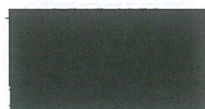
Lesley McQue

Economic Development Projects and Insights Programme Manager



[nelsonstasman tourism](#)

T:
DDI:
F:
E:
W:



www.nrda.co.nz

A: Millers Acre
Centre - Taha o te
Awa
37-39 Halifax
Street
PO Box 788
Nelson 7040

Join us here...



Written Comment No:0595



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Submission in Support of:

Potential Relocation of Salmon Farms in the Marlborough Sounds

Friday 24th March 2017

Submitted by:

**Mark Rawson, Chief Executive
Nelson Regional Development Agency
PO Box 788
Nelson 7040**



Submitted on behalf of the Nelson Regional Development Agency

Submitted to:

**Salmon Farm Relocation
Ministry for Primary Industries
Private Bag 14
Port Nelson 7042**

via

aquaculture.submissions@mpi.govt.nz

This submission pertains solely to the economic aspects of the proposal.

I do not wish to speak to my written comments at a public hearing.

Signed:

A blue ink signature of Mark Rawson, consisting of a stylized 'M' and 'R' followed by a horizontal line.

Mark Rawson, CE Nelson Regional Development Agency

24th March 2017

Written Comment No:0595

Introduction

The relocation or otherwise of up to six salmon farms within the Marlborough Sounds has potential economic effects for the Nelson Tasman Region, and this is the basis of NRDA's interest in the matter.

The Nelson Regional Development Agency is a Council Controlled Organisation, established 1 July 2016, and is 100% owned by the Nelson City Council (NCC). NRDA is funded by both Nelson City Council and Tasman District Council and has a combined Nelson and Tasman regional focus.

THE PURPOSE of the NRDA is to enhance the sustainable economic vitality of the Nelson Region by leading the development of a unique and compelling Regional Identity. This will be achieved in partnership with the public and private sectors, through the attraction and retention of investment, visitors and talent who want to add to the special character of the region.

Additionally, NRDA notes that the proposed relocation would deliver outcomes in harmony with the Government's Business Growth Agenda and the future economic aspirations of the region.

Implications of Compliance with Benthic Management Standards

The MPI proposal states that compliance with Benthic Environmental Quality Standards at some of the sites under discussion is likely to lead to a loss of production and employment, according to Price Waterhouse Cooper (PwC).

The proposal also states that the higher the water flow at a salmon farm, the more salmon production (and associated feed levels) may be increased without exceeding the limits set by the Benthic Guidelines, and that moving to higher-flow areas would improve resilience to warming sea temperatures without increasing the area of surface structures.

Current Economic Contribution

NRDA asserts that salmon farming is a significant contributor to the economy of the combined Nelson Tasman region and that therefore the viability of this industry into the future must be safeguarded. The report by Taylor Baines and Quigley and Watts (August 2016) states that, for Nelson-Tasman excluding Golden Bay, salmon farming provides the following benefits:

- 272 direct jobs plus 37 supply-chain jobs
- Over 90 per cent of New Zealand King Salmon (NZKS) staff have an income that is above the median for Nelson-Tasman residents
- 47 per cent of staff earn over \$50,000 per annum compared to 21-22 per cent of Nelson Tasman residents as a whole
- Nearly one third of the NZKS jobs were filled by people entering the workforce for the first time, re-entering the workforce, or moving from less-secure employment. NRDA considers this to be a highly desirable outcome in terms of workforce development, especially when considered alongside the youth NEET rate for Nelson/Tasman/Marlborough/West Coast:
 - 6.4 percent of 15 to 19 year olds, and
 - 29.4 per cent of 20 to 24 year olds – the highest rate in the country.

Other considerations are:

Written Comment No:0595

- NZKS is one of only 60 businesses, or 0.5 per cent, in the region that employ more than 100 people, and we assert that it is these larger businesses that are able to invest in growth and innovation, and to make a considerable contribution to the development of the wider business environment.
- The MPI proposal quotes the PwC estimate of current production at the four active existing sites results in a GDP value of \$10 million

NRDA's position is that these benefits are significant and should not be lost or reduced. Therefore, the only other viable option recognised in the MPI proposal – to reduce stocking density – is not supported by NRDA.

Potential Loss of Economic Contribution if Farms are not Relocated

- The MPI proposal states that implementing the Benthic Guidelines would require destocking and fallowing the sites for two to five years to allow the seabed to recover before recommencing production at lower stocking levels. Over the fallowing period \$10 million GDP per annum and 105 FTEs will be lost.
- Thereafter, the best-case estimate for compliant stocking and feed levels only three of the four farms currently operating would remain financially viable, resulting in a loss of annual GDP of \$6.4 million and loss of 67 FTEs.
- The worst-case scenario would be that all four farms would be non-financially viable resulting in an ongoing loss per annum of \$10 million GDP and 105 FTEs.
- The question would then be whether it would be viable for NZKS to remain in the region at all, thus calling into question the Nelson-Tasman operational contribution to the economy.

Potential Increased Economic Contribution if Increased Productivity is Permitted

The MPI proposal quotes PwC estimates that relocation of all six salmon farms would result in the following gains over ten to fifteen years as the farms are transitioned:

- Additional GDP of \$49 million per annum
- 511 FTEs
- Additional \$125 million in export revenue

Summary

NRDA submits that from an economic development perspective, the potential losses to the region if the salmon farms are not relocated, would be substantial and would damage the region's growth.

This damage would occur in the areas of GDP, export values, employment, supply chain dependencies, workforce development, youth employment opportunities, and such damage is likely to impact innovation, education and value chain development.

Furthermore, the wider aspects of the contribution of the salmon industry to the region are considerable – quite apart from the social, community and charitable activities there would be a significant opportunity cost associated with the loss of not only a large company and major employer, but also an almost iconic industry which is a significant player in elevating Nelson-Tasman beyond commodity-based products and into high quality, value-added products and whole-value chain/waste stream integration.

Therefore, we submit that the proposed relocation of the salmon farms should be approved.