

Contents Page: Salmon Smolt New Zealand Ltd – Saville-Smith

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

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333	Salmon Smolt New Zealand Ltd	
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Written Comments No: 0333

Subject	The Salmon Relocation Advisory Panel
From	<u>Salmon Smolt</u>
To	aquaculture submissions
Sent	Monday, 27 March 2017 1:57 PM

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

To: The Salmon Relocation Advisory Panel

My name is Karl French. I am General Manager for Salmon Smolt New Zealand. I have been working within the salmon industry for 17 years. For me, it's easy to understand the benefits of salmon farming and unique nature of farming this fish species in New Zealand waters. I believe the full economic benefits and farming best practices can only be realised when salmon is grown in the correct environment. These environmental parameters are very simple; cool, strong flowing water.

Any environmental impact would be limited to under or near the farm with no measurable impact the further you get away from the farming activity. Each farm environmental footprint would be small. Its impact on the wider environment would be much smaller than most other farming activities that occur in the sounds yet have a greater economic benefit.

I personally get tired of the comparisons people use from overseas farming operations. It's a different fish and different way of farming. I feel the oversight and stepped levels of production imposed on any farm relocation is enough to limit and respond to any "left field" environmental impacts.

In short, I support the potential salmon relocation process being proposed by MPI.

It will create a positive atmosphere in which to grow salmon and achieve a smaller environmental footprint. I don't feel this will have any direct effects on the company I run but at the industry level it will prevent the stagnation of development that has stifled the industry for the past 15 years.

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

Name: Karl French
Date: 27th March 2017

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Karl French

Email: [REDACTED]

Phone: [REDACTED]

Salmon Smolt NZ Ltd

[REDACTED]

Christchurch

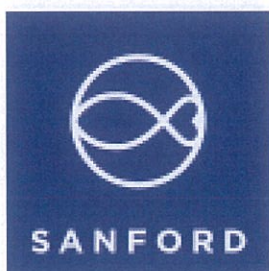
[REDACTED]

Subject	Marlborough salmon relocation
From	Alison Undorf-Lay
To	aquaculture submissions
Sent	Wednesday, 22 March 2017 4:33 PM
Attachments	<<Sanford submission site swap NZKS - submitted .pdf>>

Please find attached Sanford's submission.
With thanks.

Alison Undorf-Lay

Industry Liaison Manager



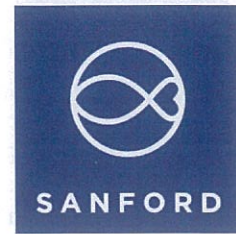
Auckland 1011, New Zealand

SANFORD.CO.NZ



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22 March 2017

POTENTIAL RELOCATION OF SALMON FARMS IN THE MARLBOROUGH SOUNDS A PROPOSAL TO AMEND THE MARLBOROUGH SOUNDS RESOURCE MANAGEMENT PLAN

A SUBMISSION BY SANFORD LIMITED

Thank you for the opportunity to submit on your proposal to amend the Marlborough Sounds Resource Management Plan, and by doing so provide for the relocation of six salmon farms owned by New Zealand King Salmon (NZKing).

Sanford's support for the relocation is provisional on two conditions:

1. The effect on existing nearby farms is recognised and provided for (mitigated), and
2. Best practice salmon farming is achieved.

Sanford would like to speak to this submission if a public hearing is convened.

Declaration

Sanford has an interest in the proposed relocation that is greater than that of the general public.

Sanford is the largest custodian of consented water space in the Marlborough Sound and holds marine farming licences on sites immediately adjacent to three of the proposed new NZKing farms¹, as such we are a near neighbour with the potential to be adversely effected.

The conditions we seek are intended to limit sequential downstream adverse effects on our business.

In addition, it should be noted that while Sanford has a direct interest in salmon farming, Sanford does not consider itself a commercial trade competitor to NZKing.

Sanford owns and manages a King (Chinook) salmon farm in Big Glory Bay, Stewart Island, that was established mid-1970s. Our farm is BAP² certified, and is part of Aquaculture New Zealand's A+ programme.

Precedent

If at some time in the future Sanford finds itself in a similar position to NZKing, and we are unable to farm in Big Glory Bay or we seek to move to more productive water space, we would look to government, Southland Region and Southland District Councils for a similar relocation package.

Many people in Bluff and Stewart Island rely on the Sanford salmon farm for their livelihoods. We have a responsibility to these people and to the environment to farm sustainably and with care. Fish

¹ Farm 1, 4 and 5.

² Best Agriculture Practice is a 3rd party global certification programme for aquaculture

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farmed in higher water flows are less likely to have health problems, or be susceptible to disease. It is to everyone's benefit if the best sites are chosen on which to farm.

Changing environment

Sanford supports the principle, 'that government support is given to assist farms to be re-located if subsequent decision makers deem the original site no longer suitable, or if changes to the environmental standards mean a farm can no longer operate in its consented area'.

Affected Party

Sanford is the largest owner of consented water space (farming Greenshell mussel) in the Marlborough Sounds. Sanford owns, share farms or contract farms seven mussel farms which are in close proximity to three of the proposed re-location sites, refer to the map at the back of this submission.

Of the six proposed NZKing new farms, three of these farms are immediately adjacent to existing Sanford farms, making Sanford an existing user that will be directly affected by a positive relocation decision.

Sanford is not opposed to the farm relocations but we do have an expectation that any cumulative effect on our business, and our existing marine licences/consents is actively considered and mitigated, and that our earlier tenancy is given priority in future decisions. We would like this matter recognised and provided for in the relocation decision.

Expert conferencing

As part of the MPI review, if a decision is made to conduct expert conferencing, Sanford gives notice that our expertise covers:

- Fish husbandry
- Site selection
- Farm management, including fallowing
- Resource Management Act, planning.

Marlborough Salmon Working Group (MSWG)

Sanford acknowledges the substantial work of the MSWG that sits behind the relocation proposal; we support its membership having been 'local people making local decisions'.

It is a disappointing however that experts were not co-opted into the MSWG to provide advice on technical 'fish farming' discussions. For example, while the group brought a wide range of skills, interests and knowledge to the table it's not clear how many of the members have technical expertise in fish farming, fish husbandry including mortalities and ocean hydrological flow requirements, so as to assist the MSWG deliberations. The absence of technical people on the MSWG may have narrowed the scope of its discussion and solutions.

We raise this in case there is an opportunity to record learnings for future collaborative working groups in other areas around New Zealand.

Industry growth

The relocation proposal seems to be viewed by MPI as, providing for industry growth through more efficient use of space rather than creating new space and a bigger farm footprint. We understand why officials may be wanting to do this, however Sanford's preference would have been to farm sites within natural resource (site) limitations and simultaneously assist in finding space for new, additional farms.

The proposed relocation plan is a reasonable solution for NZKing's problem, but is not a panacea for responding to the way the Resource Management Act landscape and natural character zoning has locked aquaculture out of much of New Zealand's sheltered coastal waters. This more fundamental issue still needs to be resolved. Many New Zealanders like to eat salmon and we think they have a right to expect that salmon can be farmed in New Zealand waters.

Industry growth can also be created by ensuring that resources are effectively managed, for example understanding a site's natural processes and limitations and working within these e.g. the warming of the ocean waters and corresponding changes to the composition of feed, or lower stocking densities.

Sanford absolutely supports that appropriate sites be farmed, and that the farming practices on the site are to a high environmental standard.

Changing the Marlborough Sounds Resource Management Plan (the Plan)

We note Government's proposal includes side stepping the regional planning process so as to allow NZKing applications to be lodged in areas where aquaculture is currently prohibited (Coastal Marine Zone Once, CMZ 1).

Sanford is a submitter to the Marlborough Environment Plan. Sanford agrees that the circumstances warrant short cutting the statutory plan process.

Sanford also supports the proposed restricted discretionary consenting process.

The Government's proposal to ensure there is no overall increase in total surface structure

The trade-off for relocation is to effectively stop any other fin fish farm being applied for in the Marlborough coastal marine area. We disagree.

Sanford does not support a cap on all future fin fish farming in Marlborough. It is not unreasonable to expect that new areas can be considered on their merit.

Proposed sites

Of the six proposed 'relocated' sites, the MSWG recommended³ that three of these go to public consultation: Richmond Bay, Horseshoe Bay and Tio Point. Sanford has existing aquaculture farms next to the **Richmond Bay** and **Horseshoe Bay** sites, see attached map.

The MSWG had divergent views on the three other proposed sites; Blowhole Point north, Blowhole Point south and Waitata mid-channel. Sanford is a close neighbour to the **Blowhole Point north** site, see attached map.

³ MSWG Recommendation 2

Sanford is concerned that the MSWG has not recognised the potential for cumulative adverse effects on existing users as a result of landscape and natural character saturation. This is a concern.

There is a possibility that the salmon farms close proximity to our existing farms (potentially eight licences) may adversely affect our own, future re-consenting – if any of these areas are deemed to be ‘over farmed’ or at or above ‘capacity’. If this occurs we would expect first user rights to take priority.

We also note that in several of the proposed new salmon farm sites it is possible that the area is a habitat for King Shag feeding and foraging. While many coastal areas are feeding grounds for marine life, when taking into account the cumulative effect on these species it should not disadvantage existing growers.

Of the six sites being proposed for new NZKing farms, Sanford has re-consenting concerns in three areas due to their close proximity to our existing farms:

- Richmond Bay
- Horseshoe Bay
- Blowhole Point north.

Should we, or any other existing grower, be disadvantaged by the planned NZKing relocations we seek government assurance that our first user rights be recognised and we are compensated with alternate space.

Salmon and mussels co-habitat well and can have a symbiotic relationship; mussels will help mitigate some of the adverse effects of fed agriculture by filtering water and reducing nitrogen. In fact mussels may even grow better if located in close proximity to a salmon farm.

A way to avoid the risk of cumulative effects adversely affecting re-consenting is for the existing farms to be re-consented first, ahead of the NZKing relocations.

Had we known about the relocation proposal with enough time, we would have proactively put our farms through the consent renewal process.

Environmental management

Sanford has discussed with NZKing why their relocation proposal as it currently stands does not include regular and planned fallowing of sites. As we understand it, MSWG has taken the view that the benthic impact directly under the farms (due to stocking and feed levels) will never be at a level where the sites would require fallowing – as set out in the Marlborough best practice guidelines.

Sanford was not one of the parties around the table that worked on the Marlborough best practice guidelines; we don't know all the details behind what information was tabled and why. However, fallowing of sites is often standard industry practice in fin fish farming around the world for both benthic management and fish health. We are surprised that fallowing is not being proposed / provided for in the NZKing site relocation proposal. We accept the geography of tides, currents, wind, benthos and the nitrogen cap and stocking rates might suggest that fallowing on the new farms is unnecessary or inefficient.

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Notwithstanding local variances, Sanford's view is that finfish – fed aquaculture sites benefit from 'rest and recovery'.

Navigation

We have reviewed the navigation consequences, we don't see the proposed new sites creating any issues.

Conclusion

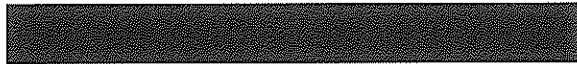
Sanford appreciates the opportunity to provide comment on your proposal.

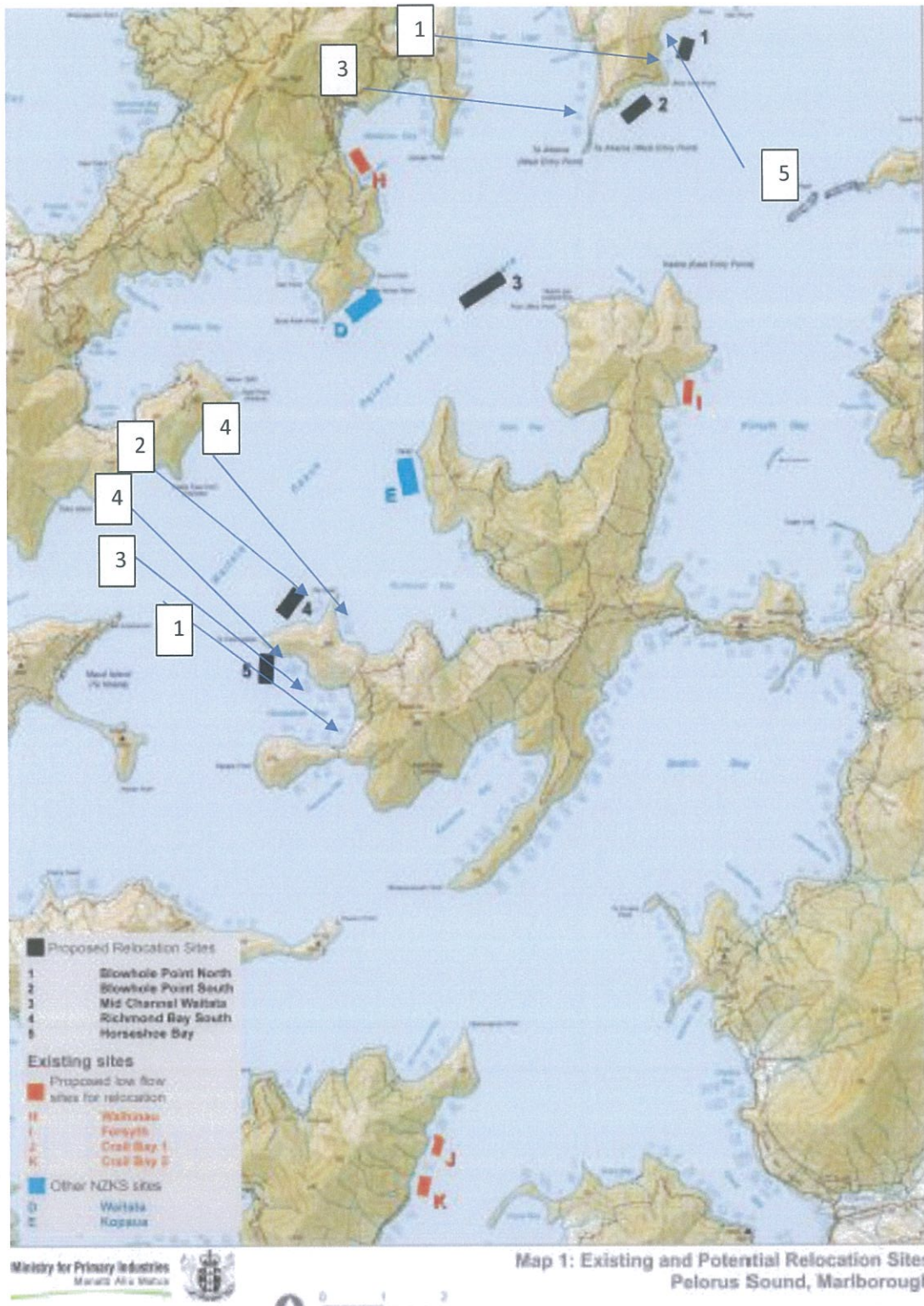
We have set out our concerns, and we proposed solutions for mitigation these.

We welcome your questions or feedback.

Sincerely

Alison Undorf-Lay
Sanford





1. Sanford owned 2. Sanford owned (2 blocks = 1 farm) 3. Sanford share farm
4. Sanford contract farm 5. Sanford farm, not recognised on MPI map

Subject	The Potential Relocation of Salmon Farms in the Marlborough Sounds:
From	[REDACTED]
To	aquaculture submissions
Sent	Wednesday, 22 February 2017 1:54 p.m.
Attachments	<<Potential-Relocation-of-Salmon-Farms-in-the-Marlborough-Sounds-Feedback-form-LDS 20170222.docx>>

Please find attached my submission on this matter

Your sincerely - Lance Searle

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Lance Searle

Managing Director
Sashimi Group Ltd (NZ)



Sashimi Group

www.sashimi.co.nz

[REDACTED]
[REDACTED]
[REDACTED]

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The Potential Relocation of Salmon Farms in the Marlborough Sounds: Feedback form

Personal Submission by:

Lance Searle

Managing Director, Sashimi Group Ltd (NZ)

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Public hearings

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

Question 2:

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

They are all very suitable.

Question 3:

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

ALL

Question 4:

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

Main concerns are navigational – this must be addressed to the satisfaction of the Harbourmaster.

Mid Channel Waitata and Tio Point – Oyster Bay

Question 5:

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

No – the benefits to the environment, the company, the community through employment and the NZ economy are significant. The costs of impaired navigation must be considered – but this is best determined by the Harbourmaster.

Question 6:

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

The rules, policies and conditions are adequate – but they must be adhered to strictly by the company. Most importantly – MDC must maintain vigilant management, ensure compliance and act effectively in any cases of breaches of conditions. Historically MDC has been lacking in this. Should the relocations go ahead – MDC should have some overview of performance by MPI (i.e. annual review).

Question 7:

Provided that detailed standards and requirements are met, do you agree that salmon farming on the potential relocation sites should be a restricted discretionary activity?

YES

Question 8:

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

NO

Should several years of farming prove sustainable operation well within limits – there should be an option for the company to make application to expand operations based on determinations of carrying capacity for the areas. Of course these determinations must be based on good monitoring and modelling data provided by recognised experts.

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?

They should be rested/recovered for several years and the recovery process monitored. They should be available for mussel or oyster farming (lower impact aquaculture) when recovery is complete. Of course any other aquaculture must comply with its specific conditions.

The sites should remain open.

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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?

The wording is satisfactory – the important aspect is the resolve of the company to comply with the regulations/conditions – and that MDC actually monitor performance and manage any issues effectively. I CANNOT STRESS STRONGLY ENOUGH THE IMPORTANCE OF MDC IMPROVING THEIR MANAGEMENT PERFORMANCE.

Question 13:

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

Many of the low flow sites have been severely impacted by farming. The benthic environment is degraded and should be rested for several years as a matter of urgency. Waihinau Bay (Bulwer) in my particular experience. MDC should have never let the situation get to the stage that we are currently in.

Other issues at the Bulwer site include poor fish health and significant mortality as noted by the local community. This is entirely caused by farming a site that is not suitable for intensive finfish aquaculture – shallow and low flow.

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?

Top priority is Waihinau Bay – but all low flow sites should be relocated as set out in this proposal.

Why? – The sites are clearly not suitable for intensive finfish farming. The flow and depth criteria are not met and they should never have been used for finfish farming.

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?

Again – I stress that MDC must effectively manage the aquaculture industry. It's my opinion that they have so far failed in delivering effective and responsible management of both the mussel and salmon industries.

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

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

Question 19:

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

Clearly – the only effects on water quality in the Sounds will be positive – compared to the current situation. Of course adequate nutrient monitoring must be undertaken on an ongoing basis to ensure that operations are sustainable and to understand better the ability of the ecosystem to absorb and flush nutrient inputs. Good numerical models must be developed, verified and continually improved. Only with monitoring and environmental modelling will proper long term management be achievable.

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?

Low flow sites should be relocated as a matter of urgency and the current feed/biomass levels farmed by NZKS should be maintained (not increased, not decreased).

After several years of demonstrated compliance and ecological compatibility – a staged increase could be considered based on the scientific evidence from monitoring and modelling any biomass increases.

Question 21:

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

The proposal serves to improve water quality (and benthic issues) overall.

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?

A proper monitoring program for water quality in relation to finfish farming is obviously required. This is not rocket science – there are internationally recognised guidelines and these should be followed. Additional monitoring may be required later should unforeseen issues arise or new questions become obvious.

Question 23:

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

With proper farming practice – the seabed effects at these new sites should be minimal and acceptable (low/med impact, highly localised and easily/quickly reversible).

If it's not – MDC need to require changes in practice.

The outcomes are likely to be manageable at these new sites – they are not at the current sites.

Question 24:

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

Salmon farms in NZ have been constrained by high density cage farming on small surface area mussel farms. Dispersion of cages across larger areas and a rotational fallowing plan are standard international practice – and these strategies must be employed.

The new sites are deeper with adequate to high flows – this will in itself remedy unacceptable seabed/benthic effects.

Question 25:

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

Of particular concern are rhodolith beds in the Marlborough Sounds. I am not aware of any beds on or close to any of the proposed new sites. Proper "baseline" surveys must be undertaken before any development begins.

MDC has been less than effective to date in ensuring adequate and timely baseline surveys relating to mussel farm expansions and rhodolith beds are threatened in Tawhitinui Reach.

Rhodoliths and coralline reefs are particularly vulnerable from organic Waste deposition.

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?

Yes – but this is not my area of expertise. Others will make these points clearly.

Question 28:

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

As above

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Question 29:

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

No more than currently. Management of marine mammals around salmon farms needs dramatic improvement.

Question 30:

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

The outer Sounds farms are likely to have more mammal issues in my opinion – but this is not my area of expertise.

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?

There will be a massive improvement in salmon health. This needs no explanation and is a certain outcome. Mortality rates will be significantly reduced and animal welfare enhanced. In addition to this feed conversion ratios and growth rates will improve – along with product quality improvements (notably flesh firmness and reduced gaping in fillets).

These improvements will improve NZKS profitability and increase their international competitiveness.

Question 33:

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

YES – these must be addressed to the satisfaction of the Harbourmaster.

Notably - Mid Channel Waitata and Tio Point – Oyster Bay

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?

Of course this siting is a major departure from historical aquaculture site locations. It is an increased navigational risk. Lighting, radar reflectors, audible and visual triggered alarms etc can all be employed to mitigate risk. Vessel “warning” barriers can also be used to mitigate risk. The Harbourmaster is best to consider these matters.

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?

YES – please make salmon farm tours a requirement for NZKS

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?

Recreational and tourism activity should be encouraged and promoted around the salmon farming sites.

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Question 37:

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

NO

Question 38:

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

Consideration of locals or recreational vessels at mooring sites in close vicinity to farms – reasonable hours of work when occurs i.e 8am-6pm. 5-6 days/week.

Question 39:

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

NO

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?

Employment of locals in the area would be a positive social and community effect. NZKS should engage more with local communities and support their initiatives.

Possibly the improvement of services to local communities. Improved cellular broadband coverage may occur.

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

My comments come from a unique perspective in that my family lives in the Pelorus Sound and I have been associated with the area all my life. I know the area very well.

Additionally I am a professional scientist and R&D manager of aquaculture projects relating to environmental assessment and management overseas. Until 2012 I was the Aquaculture Manager for Sealord Group, managing aquaculture and R&D projects across the globe.

My company Sashimi Group Ltd (NZ) works primarily with Tassal, Huon Aquaculture, Petuna Aquaculture, Tasmanian DPIWPE and EPA Tasmania. In addition to this I work with a range of internationally recognised environmental scientists across the globe.

I understand the issues from most angles better than most.

I support economic development which is environmentally and socially responsible.

I believe this proposal can meet these criteria.

I believe this development is important to support employment in Nelson, Marlborough and the Marlborough Sounds.

I trust in the Government process to ensure sustainable development in the regions.

Written Comment No:0492

Subject	Find attached Marlborough Sounds Salmon Farm Relocation Submission
From	<u>Kay Saville-Smith</u>
To	aquaculture submissions
Sent	Sunday, 26 March 2017 3:14 p.m.
Attachments	<<EMSavilleSmithMarlborough Sounds Salmon Farms.pdf>>

Potential Relocation of Salmon Farms in the Marlborough Sounds

Elizabeth Mary Saville-Smith

[REDACTED] Blenheim, Marlborough

26 March 2017

I do not want to speak to my comments at a public hearing, but I do want them to be taken seriously.

I OPPOSE the relocation of salmon farms in the Marlborough sounds because:

1. Any relocation would make a mockery of the very long statutory, consultative and technical process previously involving the community, science, and all the parties. It is consequently wrong in principle:
 - disregarding the 2013 Board of Inquiry [BOI] and 2014 Supreme Court decisions;
 - over-riding the legal powers of duly elected councils;
 - setting precedents for interference by central government into local affairs and in properly constituted court decisions; and
 - disregarding the Board of Inquiry threshold number of salmon farms for Waitata Reach as two with Richmond.
2. The proposal would shift aquaculture into space in which aquaculture is currently prohibited. Moreover,
 - The impacts of the proposal cannot be properly assessed at this point. Evidence regarding impacts will be available in the future and no proposal should be made or decided on until then.
 - The proposal involves a significant increase in fish densities and associated faecal material into the sea.
3. The proposal does not reflect the restrictions placed on other users of the Sounds with regard to pollutants and their discharge. The discharge of nitrogen from these farms will be at levels entirely unacceptable from Sounds residents or any other commercial venture.
4. The proposal constitutes an appropriation of public space and impacts on other Sounds users both through:
 - Restricting the ability of other users to discharge because the Sounds will have reached tipping point and the impact of cumulative effects.
 - Unfairly attempting to get permissions for aquaculture where other applicants have been refused because of the cumulative effects risks.
 - Degrading the landscape.
 - Degrading habitat and conditions in a critical King Shag foraging area.

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5. The applicants need to demonstrate that they:

- can operate their current high flow sites within the benthic guidelines to which they agreed over an extended period of time; and
- are actively seeking in good faith alternative sites and developing capacities to operate in less fragile sites.

I support Option C – that the Minister does not recommend the proposed regulations.



E. M Saville-Smith

Written Comment No:0497

Subject	Submission to Relocation of Salmon Farms in the Marlborough
From	<u>Kay Saville-Smith</u>
To	aquaculture submissions
Sent	Sunday, 26 March 2017 3:45 p.m.
Attachments	<<Salmon Farm Marlborough Submission KJSS.pdf>>

Written Comment No:0497

Potential Relocation of Salmon Farms in the Marlborough Sounds

Katherine Julie Saville-Smith

[REDACTED] Marlborough
[REDACTED]

26 March 2017

I support Option C – that the Minister does NOT recommend the proposed regulations.

I do want to speak to my comments at a public hearing.

I am a resident of Marlborough and actively work to ensure that commercial activities can be pursued in ways which are both commercially and environmentally sustainable as well as fair to all resource users.

I OPPOSE the relocation of salmon farms in the Marlborough sounds. My reasons are as follows:

1. Any change in regulations imposed by regulation in this way undermines the courts, current policy statements and previous processes involving scientific evidence and consultation with stakeholders and parties. Irrespective of the environmental effects, it is fundamentally wrong to:
 - use regulatory powers to support the commercial interests of a single user when other users (residential, public and commercial) have been ask to abide by restrictions – including previous applicants to undertake aquaculture;
 - over-ride duly elected councils;
 - over-ride properly constituted inquiries and court decisions – in this case the 2013 Board of Inquiry [BOI] and 2014 Supreme Court decisions;
 - disregard the Board of Inquiry threshold number of salmon farms for Waitata Reach as two with Richmond.
2. NZ King Salmon has not shown that they:
 - can operate over an extended period of time their current high flow sites within the benthic guidelines to which they agreed ; and
 - are actively seeking in good faith alternative sites and developing capacities to operate in less fragile sites.

Given those circumstances, it is inexplicable why these proposed regulations have been developed.

3. The proposal would shift aquaculture into prohibited areas and involves a significant increase in fish densities and associated faecal material into the sea. There are significant areas of uncertainty and risks of cumulative effects which mean that implementing the proposed regulations would be contrary to the

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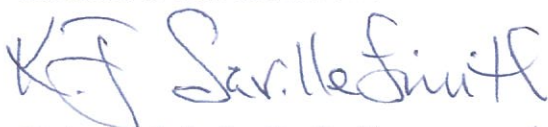
precautionary approach set out in the Coastal Policy Statement and supported by the Board of Inquiry.

4. This proposal effectively privatises a public resource for private gain and:
- Fails to recognise that other users of the Sounds must restrict their discharges of pollutants to levels far below that associated with the higher density of fish in the proposed relocated farms;
 - Will restrict the ability of other users to discharge because the Sounds will have reached tipping point and the impact of cumulative effects associated with the relocation.
 - Unfairly attempts to get permissions for aquaculture where other applicants have been refused because of the cumulative effects risks.
 - Will degrade the landscape.
 - Will degrade habitat and conditions in a critical King Shag foraging area.

In summary, the use of a regulatory mechanism to advantage a single commercial player raises significant doubts regarding both the good faith of NZ King Salmon and the position of the Government in maintaining a fair approach to resource use.

In addition, critical policies and principles in the exercise of resource management powers – fairness to existing and future resource users both commercial and others, and the precautionary policy should not be compromised in this backhanded manner.

The evidence against opening this prohibited area up still stands and has been tested through the BOI. These proposed regulations are inconsistent with hearings and decisions to date and have no sound evidential base to proceed.



Katherine Julie Saville-Smith