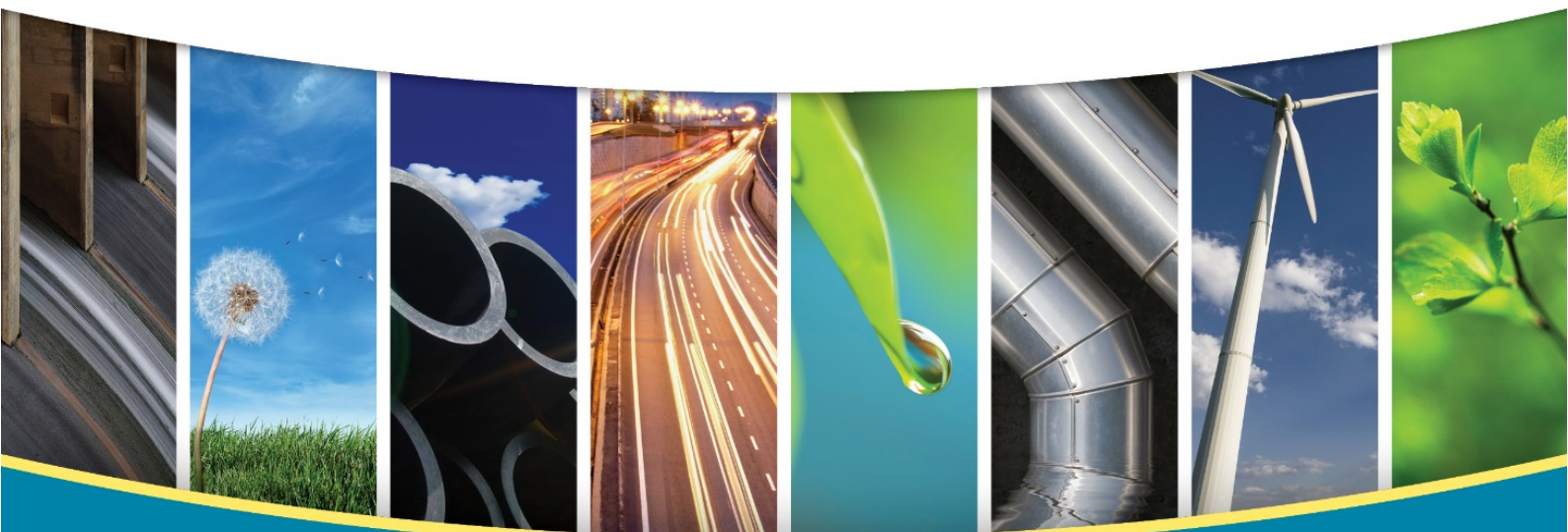


MARLBOROUGH SALMON RELOCATION REPORT ON WRITTEN COMMENTS

Prepared for the Ministry for Primary Industries

Updated 27 April 2017



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REVISION SCHEDULE

Rev No.	Date	Description	Signature or Typed Name (documentation on file)			
			Prepared by	Checked by	Reviewed by	Approved by
0.1	06/04/17	First draft	AJ/AS	AJ	FL	AC
1.0	07/04/17	Final	AJ/AS	AJ	FL	AC
1.1	10/04/17	Revised Final	AJ/AS	AJ	FL	AC
		Four written comments added				
1.2	12/04/17	Revised Final	AJ/AS	AJ	FL	AC
		Amendment made to the summary for written comment 0390				
1.3	13/04/17	Revised Final	AJ/AS	AJ	FL	AC
		One written comment added (0603)				
1.4	20/04/17	Revised Final	AJ/AS	AJ	FL	AC



Rev No.	Date	Description	Signature or Typed Name (documentation on file)			
			Prepared by	Checked by	Reviewed by	Approved by
		Amended wish to be heard status table				
1.5	27/04/17	Revised Final One written comment added (0604)	AJ/AS	AJ	FL	AC

Ministry for Primary Industries

Marlborough Salmon Relocation Report on Written Comments

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1 Introduction

The New Zealand King Salmon Company (NZ King Salmon) has resource consents for 11 salmon farm sites within the Marlborough Sounds. There are 6 consented salmon farm sites in lower-flow areas, and these will have difficulty complying with guidelines relating to seabed effects without significantly reducing production.

On 26 January 2017, the Minister for Primary Industries sought public comment on proposed regulations to amend the Marlborough Sounds Resource Management Plan to provide for the potential relocation of these salmon farms. The consultation period closed on 27 March 2017.

This Report provides a high level analysis of some statistics and themes in the written comments. This Report is not a summary of the content of the written comments, this is provided in the summary spreadsheet.

2 Methodology

All written comments received by the close of the consultation period (and 3 written comments received after the close) have been codified into themes, as set out in Table 4-1. The themes provide a method of navigating the summary spreadsheet to identify written comments which raise a particular matter.

A brief summary of the matters raised in each written comment is provided in the summary spreadsheet.

3 Analysis of Written Comments

3.1 Comments by Location

Of the 596 written comments received, the largest proportion are from Blenheim and Picton (27.9% and 20.6% respectively). The location where those providing written comment are located is outlined in Table 3-1.

Note: The majority of written comments did not include address details, instead a contact email was provided. Therefore the percentages provided in Table 3-1 are not reflective of all written comments received. Table 3-1 does however provide an indication of the spread of people interested in the proposal.

Table 3-1: Location from which Comments Received

Region	Number of Written Comments	Percentage
Auckland	4	2.9%
Blenheim	38	27.9%
Christchurch	2	1.5%
French Pass	2	1.5%
Havelock	3	2.2%
Kaiapoi	2	1.5%
Lower Hutt	1	0.7%
Marlborough	5	3.7%
Marlborough Sounds	3	2.2%
Motueka	1	0.7%
Nelson	22	16.2%
Okiwi Bay	2	1.5%
Pelorus Sound	1	0.7%
Picton	28	20.6%
Rai Valley	1	0.7%

Region	Number of Written Comments	Percentage
Rangiora	1	0.7%
Renwick	2	1.5%
Spring Creek	2	1.5%
Southbridge	1	0.7%
Tasman	1	0.7%
Thames	1	0.7%
Tokoroa	1	0.7%
Upper Moutere	2	1.5%
Wellington	5	3.7%
International	5	3.7%
Total	136	100%

3.2 Comments by Wish to be Heard Status

Of the 596 written comments received, the largest proportion did not state whether they wish to be heard (48.3%). The wish to be heard status is outlined in Table 3-2.

Table 3-2: Wish to be Heard Status

Category	Number of Written Comments	Percentage
Wish to be heard	98	16.4%
Do not wish to be heard	210	35.2%
Not stated	288	48.3%
Total	596	100%

3.3 Comments by Sector

Of the 596 written comments received, the largest proportion are from individuals (84.5%). A breakdown of written comments by sector is set out in Table 3-3.

Table 3-3: Comments by Sector

Category	Number of Written Comments	Percentage
Individual	503	84.4%
Business	63	10.6%
Government	3	0.5%
Iwi	5	0.8%
NGO or community group	22	3.7%
Total	596	100%

3.4 Position on the Proposal Expressed in Comments

Of the 596 written comments received, the largest proportion are in support (68.5%) the proposal. The position outlined in written comments is outlined in Table 3-4.

Table 3-4: Position on the Proposal

Category	Number of Written Comments	Percentage
Support	408	68.5%
Support in part	15	2.5%
Oppose	158	26.5%
Oppose in part	7	1.2%
Neutral	1	0.2%

Category	Number of Written Comments	Percentage
Not stated	7	1.2%
Total	596	100%

4 Analysis of Themes Raised in Written Comments

4.1 Themes Raised in Written Comments

Of the 596 written comments received, the environmental benefits of the proposal was raised 353 times. A breakdown of themes raised in the written comments is set out in Table 4-1.

Note: the reference number provides the ability to 'filter' written comments in the summary spreadsheet. To filter, select the [down arrow] on the [Written comments reasons/themes] column and then enter the reference number and theme e.g. *1: Assessment of alternatives* into the [search] box and then press [ok].

Table 4-1: Themes Raised in Written Comments

Reference Number	Theme	Description of the Theme	Number of Times Raised in Written Comments
1	Assessment of alternatives	Raised alternatives, or concerns with the consideration of alternative sites	15
2	Benthic environment	Raised benthic standards, or discussed benthic health	96
3	Best practice/scientific evidence	Referenced evidence, need for further research, compliance with standards, development of best practice	195
4	Biosecurity concerns	Raised concerns such as disease or poisoning of salmon stock	57
5	Concerns regarding the process	Raised concerns regarding the use of s360A of the RMA by the Minister; reference to the second application/proposal; not adequate consultation or time to consider information	144
6	Cumulative effects	Raised cumulative effects of the relocated salmon farms	105
7	Economic benefits	Increased job opportunities; job security; economic benefits for the region; flow on effects to other companies	383
8	Economic concerns	Raised concerns regarding overseas ownership of NZ King Salmon; overstating economic benefits	16
9	Effects on marine mammals	Raised concerns with regard to whales, dolphins and other marine mammals	26
10	Environmental benefits	Relocation will assist with meeting benthic guidelines, greater dispersal of waste due to higher water flow and depth.	353
11	Environmental concerns	Raised concerns such as fewer fish, not as many species, serious loss of biogenic habitats, sedimentation in estuaries and biosecurity incursions	158
12	Existing sites are not suitable	Expressed concern that the existing sites are not in the right location, in an area of low water flow, capacity.	7
13	Farm breakaway	Risks/concerns of farm breakaway	3
14	Food source/climate change	Discussed benefits/sustainability of salmon farms, salmon being protein rich	20

Reference Number	Theme	Description of the Theme	Number of Times Raised in Written Comments
15	Heritage concerns	Raised concerns regarding the impact of the salmon farms on heritage values/features, taonga	7
16	Human health benefits	Identified health benefits, good quality products, range of products	11
17	Impacts on nearby scallop beds	Concerns regarding the impact on nearby scallop beds	60
18	Impacts on recreational users	Concerns regarding impacts on swimmers, recreational fishers and boaties.	71
19	Impacts on tourism	Concerns that the farms may impact tourism, not align with NZ's 'clean green' image	70
20	Increased amenity	Discussed the benefits of moving the salmon farms further from shore, reduced noise, lighting, and odour effects	129
21	Increased efficiency of farms	Stated that higher water flow sites will allow increased efficiency of salmon farming	3
22	Increased health of fish stocks	Discussed benefits to fish stocks of higher water flow sites, reduced disease and biosecurity concerns	132
23	King Shag	Discussed impacts on New Zealand King Shag	110
24	Lighting concerns	Raised concerns with lighting/underwater lighting	11
25	Loss of natural character/landscapes	Concerns regarding the loss of natural character, landscapes and specific features.	120
26	Maori values	Consultation with iwi, impacts on Maori cultural values, taonga, fisheries	10
27	Natural fish stocks	Impacts on other natural fish stocks in the Marlborough Sounds	10
28	Navigational benefits	Moving farms to more remote locations will aid navigation	35
29	Navigational risks	Raised concerns around increased risk to the operation of both commercial and recreational vessels; predominantly with regard to the Waitata Reach Mid Channel site	100
30	Noise and odour effects	Concerns regarding increased odour/noise effects from the relocated farms	10
31	Occupying public water	Raised occupation of public waterways, concerns regarding private profit from a public resource	11
32	Planning/legal framework	Discussed use of s360A, whether the proposal is/is not giving effect to the New Zealand Coastal Policy Statement or consistent with Part 2 of the RMA	21
33	Precautionary approach	Raised adoption of the precautionary approach	35
34	Recreational benefits	Raised that the relocation of the farms will have benefits for swimmers, recreational fishers and boaties	19
35	Social benefits	Raised NZ King Salmon support of the local community, employee benefits, education, donations	168
36	Social impacts	Social impacts/effects on the community through loss of natural character/reduction in tourism/job losses	11
37	Support regarding the process	Discussed consultation, working groups, and provision of technical reports	24



Reference Number	Theme	Description of the Theme	Number of Times Raised in Written Comments
38	Technological	Raised technology improvements, efficiencies or conversely awaiting for future/further development in technology prior to considering relocation	7
39	Tourism benefits	Attracting tourists to the region, boat tours, tourist visits to the farms	23
40	Water quality benefits	Greater dispersal of waste due to higher water flow and depth.	38
41	Water quality concerns	Concerns that the relocation will lead to increased waste discharge, therefore affecting water quality.	47

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