

# Memorandum

**To:** Ministry for Primary Industries ( MPI)

**Cc:** The Marlborough Salmon Working Group

**From:** Marine subcommittee of Kenepuru and Central Sounds Residents' Association (KCSRA)

**Subject:** Objectives and requests for additional information

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## Introduction

1. The MSWG has now had two meetings, the terms of reference reviewed, field trips and a little technical information supplied. The group is now about to begin to get into the substance of the exercise. Accordingly KCSRA thought it timely to clarify its objectives and aspirations as a participant community group to avoid any surprise or confusion later in the exercise. We also seek certain additional information and offer to flesh out an area where we believe essential technical detail is currently lacking.

## Consultation

2. KCSRA as an engaged community group is often involved in formal consultation by central and local government. Accordingly, we are well versed in the duties and obligations of consultation. In essence a party may approach consultation with its own objectives and plan so long as it engages with an open mind. We regard the current process as essentially one of consultation. We appreciate MPI as prime mover in this process will have its own set of aspirations and plan. These may or may not align with the aims of the agreed terms of reference. As noted above we thought it timely to convey KCSRA's objectives.

## KCSRA Objectives

3. KCSRA's primary objectives are two fold:
  - A. Agreement as to a more prompt time frame by which NZKS brings its existing consented Sounds salmon farms into compliance with the Best Practice Management Guidelines (BMP Guidelines).
  - B. For those salmon farms that NZKS cannot/will not bring into line with BMP Guidelines for whatever reason a time line as to closedown be agreed.
4. As can be appreciated these objectives closely mirror the aims of the group as set out in the terms of reference.

5. We appreciate from the thrust of the subject matter MPI has presented to the group to date MPI may wish that an outcome of the groups deliberations and discussion is consensus as to agreement that areas in the Sounds identified by MPI as potentially suitable for replacement salmon farms be agreed. Whilst this outcome is not an aim of the group we intend to approach this aspiration with an open mind. Equally as we see it that may not be an outcome. We trust that MPI is also approaching such an outcome with an open mind.

### **Additional Information**

6. A basic requirement of consultation is that the consultor (MPI) is required to supply the consultee with sufficient prior information to adequately inform them in order that they can make a considered response. In this case the site status table of existing NZKS farms **is a good start** and will be a useful reference aide going forward. However we **request** that the table be fleshed out with additional information - a quantitative definition of low v's high flow, average flows at the sites, water depth, where sites are non compliant with BMP Guidelines those aspects of BMP that they do not currently meet, confirmation in the table as to if Farm ( ID A- Clay point) is compliant or not, re Waitata (ID D) please clarify in the table what "likely to comply" means in fact, same with farm ID E, finally each sites resource consent number to be added in as part of the ID column. In passing we understood from previous discussions with NZKS that Waitata was an active farm?
7. In the field trip we were taken to several MPI researched alternative sites and have been supplied assorted documentation on these sites. As we assimilate this information we may have additional information requests. In the interim we note an issue of much interest to the community and given the proposed locations this concern will be even sharper. In brief it is well recorded that salmon farms attract predators. Accordingly in the context of these possible new sites what research / work has been done on the possible impacts of migratory fish species (such as snapper and blue cod) as they seek to pass these predator enriched environments?

### **Water temperature**

8. KCSRA's research to date has identified water temperature as a key site suitability factor. To that end we prepared a plain English research paper (**see attached**). To date this seems to be an over looked factor. To rectify this the prime author (Hanneke Kroon) of the KCSRA would be pleased to talk to the paper at the next meeting of the group.
9. We look forward to receiving the updated existing site status table.

KCSRA Marine Subcommittee  
1 August 2016

