

Kenepuru & Central Sounds



Kenepuru & Central Sounds Residents Association Inc.

The Hon Nathan Guy
Minister for Primary Industries and Aquaculture
Executive Wing
Parliament Buildings
Wellington

Ross Withell
President KCSRA
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8 December 2016

Dear Sir

Marlborough Salmon Working Group – Some balancing comments and recommendations

1. As you may be aware from your officials from the Ministry for Primary Industries (**MPI**), the Kenepuru and Central Sounds Residents' Association (**KCSRA**) agreed to have two representatives participate in the MPI convened Marlborough Salmon Working Group (**MSWG**). Our agreement was predicated on a set of agreed terms of reference. At the end of that process your officials produced a report with a set of recommendations that we understand you will shortly take to Cabinet.
2. After reflection and discussion the KCSRA marine subcommittee who assisted and supported our representatives thought it appropriate and necessary to write to you to record our concerns over aspects of the process to the effect that considerable caution needs to be exercised before assuming that the MSWG report recommendations follow from a fair, open and considered process.
3. Rather we set out below what we consider to be a number of failings from the process together with a more representative set of recommendations from community representatives such as those from KCSRA:

Kenepuru & Central Sounds Residents Association Inc.

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- It was unfortunate that the agreed terms of reference with its stated aim of improving management practices in **existing** New Zealand King Salmon (**NZKS**) farms was in fact pushed to one side by MPI in favor of what was its clearly predetermined intent of exclusively focusing on promoting alternative sites.
- MPI never addressed how a NZKS entitlement to alternative sites arose.
- The fundamental issue of the Sounds as a long (or even medium) term suitable location for salmon farming given the likes of rising water temperatures and several recent unusual mortality events in NZKS farms was an off limits discussion.
- It was most unfortunate that much of the MPI supplied expert reports and material was sourced from consultants with a history of assisting/advocating for NZKS at the likes of the 2012 Board of Inquiry. In the case of the disease expert, he was, it seemed, unaware of the recent unusual mortality events and the MPI Biosecurity notice in place as a result of the same. The credibility of these reports was farther undermined by the absence of independent expert review in a number of key areas (e.g. disease and economics) which seriously weakened the likelihood of MPI achieving its desire to have the community representatives agree to a set of farm relocation sites.
- The large volume of material, often supplied at the last minute but with the expectation that MSWG members would nevertheless be expected to provide meaningful comment made for an unhelpful and time pressured environment that was not conducive to supporting positive outcomes.
- That there is no substantive case for putting forward the three Tier 2 proposed sites *Waitata mid-channel (#125)*, *Blowhole point north (#34)*, *Blowhole point south (#122)*) was ignored by MPI. Accordingly KCSRA **recommends** that these be dropped out of any proposed public consultation process.
- That the MSWG process raised serious legal questions from community representatives as to the wisdom of including the two Tier 1 sites located in the Waitata reach area (*Richmond bay south (#106)* and *Horseshoe bay (#124)*) which MPI have failed to satisfactorily address. Accordingly, KCSRA **recommends** that these issues be comprehensively addressed and discussed before these sites are put up as potential relocation sites in any proposed public consultation.
- Further, the two Tier 1 Waitata Reach sites raise substantive issues for public and commercial stakeholders (proximity to scalloping and recreational fishing areas) which were not reasonably addressed in any substantive manner. Accordingly, KCSRA **recommends** that these be further investigated and discussed before being put up as potential relocation sites in any proposed public consultation.
- Despite protests from community representatives there was no substantive discussion as to how existing NZKS farm sites could be managed on a more sustainable basis in line with Best Management Practice salmon farm guidelines. Indeed this aspect was avoided or at best hastily skated over. KCSRA **recommends** that MPI, with assistance and input from independent experts and other stakeholders, be directed to work to achieve this outcome.

4. MPI also employed, in our view, a number of unfortunate tactics to “dress up” the proposed report that seriously dented their credibility and thus the process. Thus for example it was quite disturbing for community representatives to discover that in a “final” draft, MPI had unilaterally decided to exclude its very active participation in directing and drafting outcomes by removing their and other government agencies representatives from the list of participants. Whilst ultimately corrected, this tactic diverted community representatives’ time and effort away from tackling other important issues with the report. Community representatives also had to uncover and then deal with what appeared to be MPI attempts to camouflage the cumulative effects of existing salmon farms in the Waitata reach in the biophysical modelling presented to the group. After reflection and discussion the KCSRA marine subcommittee who assisted and supported our representatives thought it appropriate and necessary to write to you to record our concerns over aspects of the process to the effect that considerable caution needs to be exercised before assuming that the MSWG report recommendations follow from a fair, open and considered process.

5. Against this background KCSRA would like to urge the Minister and his colleagues to take stock and implement a process where the merits or otherwise of granting NZKS additional salmon farming capacity in the Sounds are placed before a Environment Court Judge (or a suitably qualified independent panel) tasked with hearing and assessing the conflicting evidence, under oath, so the public can have a high degree of confidence in the environmental integrity of the outcomes in this much treasured area.

Yours Sincerely

Andrew Caddie

Chair Marine Sub Committee

Kenepuru and Central Sounds Residents’ Association

cc Minister of Conservation.

cc Minister for the Environment

Executive Wing, Parliament Buildings Wellington